

Recipient ID 5566
OFFICE OF CIVIL RIGHTS, RACIAL EQUITY & INCLUSION
OCTOBER 2022

Title VI Program Update



Metro

Los Angeles County
Metropolitan Transportation Authority

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Executive Summary

The purpose of the Title VI Program Update is to document the steps the Los Angeles County Metropolitan Transportation Authority (Metro) has taken and will take to ensure that Metro provides services without excluding or discriminating against individuals on the basis of race, color and national origin. In addition to the Title VI protected categories, Metro will take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law. In 2018, the Metro Board of Directors approved the Equity Platform which has a core objective to increase access to opportunities. The Equity Platform has four pillars: Define and Measure, Listen and Learn, Focus and Deliver and Train and Grow. Metro's Equity Definition is both an outcome and a process to address disparities to ensure fair and just access to opportunities. 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 Service Standards were adopted by the Board as well as the Results of the Service Monitoring. These policies were followed when the Service Equity Analysis was conducted for the Next Gen Bus Plan in October 2020. 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 and coordinator, designer, builder and operator for one of the country's largest, most populous counties. More than 10.1 million people – nearly one-third of California's residents – live, work, and play within its 1,433-square-mile service area. We are pleased to submit the 2022 Title VI Program Update.

Metro's 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.

Contact Information:

Aida Berduo Berry

Senior Manager, Civil Rights Programs (Title VI)

Metro Office of Civil Rights

(213) 922-2748

BerryA@metro.net

INTRODUCTION

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

This Title VI Program Update is being submitted to FTA in accordance with FTA’s Concurrence letter sent to Metro on April 7, 2020. In the Concurrence letter, FTA informed Metro that our Title VI Program Update, submitted on October 30 2019, met the requirements set out in the FTA Title VI Circular, 4702.1B and that that our next Title VI Program Update would be due October 1, 2022. A copy of this letter is included in **Appendix A**. This Program Update will be for the period of **December 1, 2022 to November 30, 2025**.

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

Any questions regarding this Title VI Program Update can be directed to the Deputy Chief, Office of Civil Rights, Racial Equity & Inclusion or Aida Berduo Berry, Senior Manager of Civil Rights Programs (Title VI) at BerryA@Metro.net or at (213) 922-2748.

GENERAL REQUIREMENTS

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

1. Notification to Beneficiaries of Title VI Protections

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

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

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

Notice regarding Metro's Civil Rights Policy has been disseminated throughout Metro's rail and bus system. Metro's Notice of Civil Rights also contains a statement that Metro operates its programs without regard to race, color, or national origin and provides a phone number for customers to call to get information regarding Metro's Title VI obligations and the procedure for filing a Title VI discrimination complaint. Metro's Notice of Civil Rights has been placed in backlit cases in almost all rail stations. It has also been posted on all 25 floors of Gateway Plaza, Metro's headquarters, as well as in all of Metro's Divisions. A "take-one" brochure of the notice is placed on buses. The notice is also available at Metro's Customer Centers. The Civil Rights Notice in the backlit cases and the brochures have been translated into the seven 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 the seven languages and with the assistance of Google Translate, may be translated into seven additional languages. Metro's Civil Rights Notice (**Figure 1**), including photos of the backlit cases (**Figure 2**) along with a list of all of the locations the Civil Rights Notice is posted are included in this section.

Metro Notice of Civil Rights

The Los Angeles County Metropolitan Transportation Authority (Metro) operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. In addition to Title VI, Metro also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status, sexual orientation or any other protected classes as described in State or Federal laws. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice may file a complaint with Metro. For more information on Metro's civil rights program and the procedure to file a complaint, please contact Metro using the information listed below.

Aviso de Metro sobre derechos civiles

La Autoridad de Transporte Metropolitano del Condado de Los Angeles (Metro) opera sus programas y servicios sin distinción de raza, color u origen nacional, de acuerdo al Título VI del Acta de Derechos Civiles. Además del Título VI, Metro también prohíbe la discriminación por razón de sexo, edad, discapacidad, religión, condición médica, estado civil, orientación sexual, o cualquier otra categoría protegida, como se describe en las leyes federales o estatales. Cualquier persona que considere que ha sido víctima de alguna práctica discriminatoria puede presentar una queja con Metro.

Para más información acerca del programa de derechos civiles de Metro y del procedimiento para presentar una queja, por favor contacte a Metro usando la información que se presenta a continuación.

Metroからの公民権に関するお知らせ

ロサンゼルス郡首都運輸局 (Metro)は、公民権法タイトルVIIに従って人種、皮膚の色、出身国に拘わらずに事業を行っています。タイトルVIIに加え、Metroは性別、年齢、障害、宗教、医療的な状態、結婚状態、性的指向、あるいは州法または連邦法に記載のその他の「プロテクトド・クラス(protected classes)」に基づく差別を禁止しています。不法な差別待遇を受けたと思う人は、誰でもMetroに対して苦情を提出することができます。Metroの公民権プログラムと苦情提出手続きに関する詳細は、以下の方法でMetroまでお問い合わせください:

洛杉磯大都會交通局公民權利通告

洛杉磯大都會交通局 (Metro)之營運計劃和服務依照《民權法案》第六條款規定不因種族膚色及國籍而區別待遇除第六條款之外、Metro亦禁止基於性別、年齡、殘障、宗教信仰、疾病、婚姻狀況、性傾向、或州或聯邦法律描述的任何其它受保護類別的歧視。任何人如受到非法歧視的侵害請使用以下聯絡資料向Metro投訴

Thông báo của Metro về Dân Quyền

Cơ Quan Vận Chuyển Đô Thị Quận Hạt Los Angeles (Los Angeles County Metropolitan Transportation Authority – Metro) điều hành các chương trình và dịch vụ của cơ quan mà không phân biệt sắc tộc, màu da, và nguồn gốc quốc gia theo Tiêu đề VI của Đạo Luật Dân Quyền. Ngoài Tiêu Đề VI, Metro cũng nghiêm cấm phân biệt đối xử dựa trên giới tính, tuổi, tình trạng khuyết tật, tôn giáo, tình trạng bệnh tật, tình trạng hôn nhân, xu hướng tình dục hay những phân loại khác được bảo vệ theo như mô tả trong luật Tiểu Bang hay Liên Bang. Bất kỳ ai tin rằng mình bị phân biệt đối xử bất hợp pháp đều có thể khiếu nại với Metro. Để biết thêm thông tin về chương trình dân quyền của Metro và thủ tục khiếu nại, vui lòng liên lạc với Metro qua những cách dưới đây.

메트로 Metro의 공민권 통지서

로스앤젤레스 카운티 도시교통국 (Metro)은 공민권법 제6장에 준하여 인종, 피부색 및 출신국에 상관없이 프로그램 및 서비스를 운영합니다. 또한 메트로는 공민권법 제 6장에 추가해서 성별, 연령, 장애, 종교, 의로 상태, 결혼 여부, 성적 성향 또는 주나 연방법에서 규정하는 다른 보호 등급에 근거한 차별 대우를 금지합니다. 불법적인 차별 대우로 인해 권리를 침해당했다고 생각하는 사람은 누구나 Metro를 상대로 고소를 제기할 수 있습니다. Metro의 공민권 프로그램 및 불만 제기 절차에 대한 상세한 정보가 필요하시면, 정보를 이용하여 Metro에 연락하십시오.

Уведомление Metro о гражданских правах

Транспортное управление округа Лос-Анджелес (Metro) реализует свои программы и предоставляет услуги независимо от расы, цвета кожи и национального происхождения в соответствии с Разделом VI Закона о гражданских правах (Civil Rights Act). Наряду с выполнением требований Раздела VI, в Metro запрещена дискриминация по таким признакам, как пол, возраст, ограниченные возможности здоровья, религиозные убеждения, состояние здоровья, семейное положение и сексуальная ориентация, или другим признакам, как указано в федеральных законах или законах штата. Любое лицо, которое считает себя подвергшимся незаконной дискриминации, может подать жалобу в Metro. За дополнительными сведениями о политике Metro в отношении гражданских прав и о процедуре подачи жалоб обращайтесь в Metro, используя нижеперечисленную информацию.

ՄԵՏՐՈ-ի Ծանուցումը Զաղաքացիական Իրավունքների Վերաբերյալ

Լոս Անջելես քաունիթի մետրոպոլիտան տրանսպորտի վարչությունը (Metro) իրագործում է իր ծրագրերը և ծառայություններն առանց ռասայի, մաշկի գույնի ու ազգային ծագման խտրականության, ինչպես ենթադրում է Քաղաքացիական իրավունքների մասին օրենքի Գլուխ VI-ը: Ի լրացում Գլուխ VI-ի, Metro-ն նաև արգելում է խտրականությունը սեռի, տարիքի, հաշմանդամության, կրոնի, բժշկական վիճակի, ամուսնական կարգավիճակի, սեռական կողմորոշման կամ ցանկացած այլ պաշտպանված դասակարգման հիման վրա, ինչպես դա նշված է նահանգային կամ դաշնային օրենքներով: Ցանկացած անձ, ով կարծում է, որ ինքն ենթարկվել է ապօրինի խտրականության, կարող է բողոք ներկայացնել Metro-ին: Metro-ի քաղաքացիական իրավունքների ծրագրերի մասին և բողոք ներկայացնելու վերաբերյալ լրացուցիչ տեղեկություններ ստանալու համար խնդրում ենք դիմել Metro՝ ստորև նշված միջոցներով:



Metro

323.466.3876 x2
Español
323.466.3876

中文	x3	русский	x7
한국어	x4	Հայերեն	x8
Tiếng Việt	x5	தமிழ்	x9
日本語	x6	ไทย	x10

213.922.6235

California Relay 711

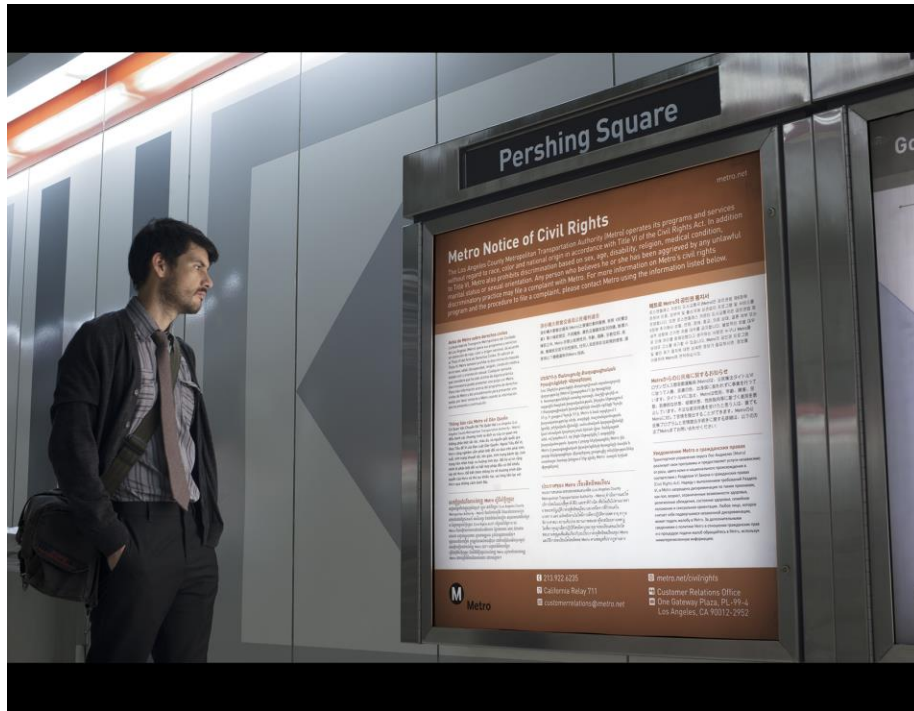
customerrelations@metro.net

metro.net/civilrights

Customer Relations Office

One Gateway Plaza, PL-909-4
Los Angeles, CA 90012-2952

Figure 2 (Metro Station Backlit Notice)



List of Locations:

RAIL LINE/ROUTE

STATION LOCATION

A Line (Blue)	Firestone Station
A Line (Blue)	Willow Street
B Line (Red)	7th Street / Metro Center
B Line (Red)	Hollywood / Highland
B Line (Red)	Hollywood / Vine
B Line (Red)	Hollywood / Western
B Line (Red)	Universal / Studio City
B Line (Red)	Vermont / Beverly
B Line (Red)	Vermont / Santa Monica
B Line (Red)	Vermont / Santa Monica
B Line (Red)	Vermont / Sunset
B Line (Red)	Vermont / Sunset
B Line (Red)	Civic Center / Grand Park
B Line (Red)	Pershing Square
B Line (Red)	Westlake / MacArthur Park
B Line (Red)	Wilshire / Vermont

RAIL LINE/ROUTE

STATION LOCATION

B Line (Red)	Wilshire / Vermont
B Line (Red)	Union - Red & Purple Lines
B Line (Red)	Union - Red & Purple Lines

B Line (Red)	Union - Red & Purple Lines
C Line (Green)	Willowbrook - Rosa Parks
C Line (Green)	Avalon
C Line (Green)	Aviation / LAX
C Line (Green)	Crenshaw
C Line (Green)	Douglas
C Line (Green)	El Segundo
C Line (Green)	Hawthorne / Lennox
C Line (Green)	Mariposa
C Line (Green)	Norwalk
C Line (Green)	Redondo Beach
C Line (Green)	Redondo Beach
C Line (Green)	Vermont / Athens
D Line (Purple)	Wilshire / Western
E Line (Expo)	26th Street / Bergamot
E Line (Expo)	26th Street / Bergamot
E Line (Expo)	Downtown Santa Monica
E Line (Expo)	Downtown Santa Monica
E Line (Expo)	Expo / Sepulveda
E Line (Expo)	Expo Park / USC
E Line (Expo)	Farmdale
E Line (Expo)	Farmdale
E Line (Expo)	Jefferson / USC
E Line (Expo)	La Cienega / Jefferson
E Line (Expo)	LATTC / Ortho Institute
E Line (Expo)	Palms
E Line (Expo)	Westwood / Rancho Park
E Line (Expo)	Expo / Crenshaw
E Line (Expo)	Expo / Crenshaw
E Line (Expo)	Expo / Vermont
E Line (Expo)	Expo / Western
G Line (Orange)	Balboa
G Line (Orange)	Canoga
G Line (Orange)	Canoga
G Line (Orange)	Tampa
G Line (Orange)	Woodley
G Line (Orange)	Chatsworth
RAIL LINE/ROUTE	STATION LOCATION

G Line (Orange)	De Soto
G Line (Orange)	Nordhoff
G Line (Orange)	Pierce College
G Line (Orange)	Roscoe
G Line (Orange)	Reseda

G Line (Orange)	Sherman Way
G Line (Orange)	Laurel Canyon
G Line (Orange)	Sepulveda
G Line (Orange)	Valley College
G Line (Orange)	Van Nuys
G Line (Orange)	Warner Center Transit Hub
G Line (Orange)	Woodman
J Line (Silver)	North Hollywood
J Line (Silver)	North Hollywood
J Line (Silver)	37th St / USC
J Line (Silver)	Harbor Fwy / Carson
J Line (Silver)	Cal State LA Busway
J Line (Silver)	USC Medical Ctr Busway
J Line (Silver)	El Monte Bus Station
J Line (Silver)	Harbor Gateway Transit Center
J Line (Silver)	Harbor Transitway / Manchester
J Line (Silver)	Harbor Fwy / Pacific Coast
L Line (Gold)	Harbor Transitway / Rosecrans
L Line (Gold)	Harbor Transitway / Slauson
L Line (Gold)	Allen
L Line (Gold)	APU / Citrus College
L Line (Gold)	Arcadia
L Line (Gold)	Atlantic
L Line (Gold)	Azusa Downtown
L Line (Gold)	Azusa Downtown
L Line (Gold)	Chinatown
L Line (Gold)	Duarte / City of Hope
L Line (Gold)	Del Mar
L Line (Gold)	Del Mar
L Line (Gold)	East LA Civic Center
L Line (Gold)	Fillmore
L Line (Gold)	Highland Park
L Line (Gold)	Heritage Square / Arroyo
L Line (Gold)	Indiana

RAIL LINE/ROUTE

STATION LOCATION

L Line (Gold)	Irwindale
L Line (Gold)	Irwindale
L Line (Gold)	Lincoln Heights / Cypress Park
L Line (Gold)	Memorial Park
L Line (Gold)	Memorial Park
L Line (Gold)	Monrovia
L Line (Gold)	Monrovia
L Line (Gold)	Mariachi Plaza / Boyle Heights

L Line (Gold)	Southwest Museum
L Line (Gold)	Maravilla
L Line (Gold)	Pico / Aliso
L Line (Gold)	Sierra Madre Villa
L Line (Gold)	Soto
A Line (Blue)	South Pasadena
A Line (Blue)	Union - Metro Gold Line
B Line (Red)	Firestone Station
B Line (Red)	Willow Street
B Line (Red)	7th Street / Metro Center
B Line (Red)	Hollywood / Highland
B Line (Red)	Hollywood / Vine
B Line (Red)	Hollywood / Western

2. Title VI Complaint Procedure and Complaint Form

As part of Metro’s commitment to ensuring that no person is discriminated against on the basis of race, color, national origin, or any other federal and/or state protected category, and to ensure compliance with 49 CFR Section 21.9 (b), Metro has developed The Civil Rights Policy which includes procedures for investigation and tracking Title VI complaints. Metro policy is to investigate complaints that are filed in writing within 180 days from the date of the alleged discrimination in which the complainant alleges discrimination on the basis of race, color, or national origin. Each complaint alleging discrimination based on race, color, or national origin is categorized as a Title VI complaint and investigated according to Metro’s Title VI Complaint Procedure. The policy can be found on Metro’s website at: <http://www.metro.net/about/civil-rights-policy/> Translated versions of the procedure and complaint form can be accessed by clicking the tab titled “Additional Languages”

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



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

In order to comply with 49 CRF Section 21.9(b), Metro's Office of Civil Rights, Racial Equity & Inclusion (OCREI) maintains a list of all active complaints, investigations, and lawsuits naming Metro, on the basis of race, color, and/or national origin. This list includes the date of the complaint, investigation or lawsuit; a summary of the allegations; and the status of the complaint, investigation, or lawsuit; and the actions taken in response to the complaints, investigations, and lawsuits. From July 1, 2019 to June 30, 2022, Metro had approximately **100** valid Title VI related complaints.

Investigations

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

Complaints

Metro personnel that customers most commonly interact with are Bus Operators. It is, therefore, not surprising that the majority of Title VI complaints involve customers alleging discrimination by a bus operator. In all cases, the complaint is sent to the operator's division manager and to the Office of Civil Rights, Racial Equity & Inclusion (OCREI) group by Customer Relations. The complaint is reviewed by the division manager, or the designee of the division manager, who takes a statement from the operator and sends a transcript of the statement to OCREI. 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 recording is reviewed by the division manager who then prepares a report and sends the report to OCREI. This report contains information regarding 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 disciplinary actions taken in response to any complaints.

All division reports are reviewed by investigators in the OCREI group. The investigators have discretion to ask the division manager for more information about the incident, including asking follow-up questions to the operator. The investigator may also review the digital recording themselves, reach out to any witnesses to the incident for follow-up, and ultimately make recommendations regarding disciplinary actions if it is determined that there is merit to the complaint. In some instances, depending on the circumstances presented in the complaint, investigators will request a Mystery Ride to gain insight generally into how the operator approaches customer service and specifically to observe for any other instances of discriminatory animus. After the investigator reviews all of the available information, a report is written that analyzes the information presented in the underlying complaint, the evidence received in the investigation undertaken, and concludes with a finding of substantiated or unsubstantiated depending on what the evidence reveals. When a determination is made that a Title VI complaint has merit, operators or other Metro personnel are disciplined appropriately and in accordance with Metro policy, the Metro Bus Operator Rulebook & Standard Operating Procedure, applicable Collective Bargaining Agreements, or other employment contracts. In instances where no merit is found, or disciplinary action is not warranted, operators may be provided with consultation and updated training.

The process for formally closing complaint investigations requires three levels of review. All complaint investigations are reviewed by the Director of EEO Programs & Investigation, Deputy Chief for the Office Civil Rights, Racial Equity & Inclusion, Senior Manager of Civil Rights Programs and County Counsel. Once all parties

have reviewed the complaint and findings, the complaint is formally closed and a letter is sent to the complainant and respondent stating that an investigation was conducted and that the matter is closed.

A list of Metro Title VI related complaints, investigations and lawsuits from **July 1, 2019 to June 30, 2022** is included in this section.

Lawsuits

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

Date Received	Source Of Complaint	Case Number	Allegation Outcome	Substantiated	Basis Of Discrimination	Review Status	Initial Closure Date
07/15/2019	Patron	00195-2019	Investigation	Unsubstantiated	Disability, Pregnancy Disability, National Origin	Closed	11/27/2020
07/29/2019	Patron	00214-2019	Referred		Race	Closed	08/05/2019
08/07/2019	Patron	00244-2019	Investigation	Unsubstantiated	Race	Closed	01/08/2021
08/28/2019	Patron	00276-2019	Investigation		Race	Closed	11/08/2021
09/17/2019	Patron	00297-2019	Investigation	Unsubstantiated	Race	Closed	09/10/2020
09/20/2019	Patron	00298-2019	Investigation	Unsubstantiated	National Origin	Closed	12/19/2019
09/23/2019	Patron	00307-2019	Inquiry		National Origin	Closed	06/11/2020
11/18/2019	Patron	00443-2019	Investigation		Race	Closed	02/24/2020
11/19/2019	Patron	00444-2019	Investigation	Unsubstantiated	National Origin	Closed	09/02/2020
12/06/2019	Patron	00482-2019	Investigation		Race	Closed	10/26/2020
12/13/2019	Patron	00483-2019	Investigation		National Origin	Closed	03/03/2020
12/26/2019	Patron	00524-2019	Investigation	Unsubstantiated	Race	Closed	11/16/2020
12/26/2019	Patron	00525-2019	Investigation		Race	Closed	01/20/2021
12/30/2019	Patron	00526-2019	Investigation		National Origin	Closed	09/02/2020
01/22/2020	Patron	00044-2020	Investigation	Unsubstantiated	Race	Closed	12/14/2020
01/22/2020	Patron	00045-2020	Investigation		Race	Closed	09/03/2020
02/06/2020	Patron	00110-2020	Investigation	Unsubstantiated	Race	Closed	10/27/2020
02/11/2020	Patron	00109-2020	Investigation	Unsubstantiated	Race	Closed	09/30/2020
02/12/2020	Patron	00119-2020	Investigation	Unsubstantiated	National Origin	Closed	11/17/2020
02/13/2020	Patron	00133-2020	Investigation		National Origin	Closed	12/30/2020
02/14/2020	Patron	00131-2020	Investigation		Race	Closed	12/09/2020
02/14/2020	Patron	00132-2020	Investigation		Race	Closed	12/30/2020
02/25/2020	Patron	00153-2020	Referred		National Origin	Closed	03/04/2020
03/03/2020	Patron	00168-2020	Investigation		National Origin	Closed	11/18/2020
03/09/2020	Patron	00169-2020	Investigation	Unsubstantiated	Race	Closed	02/04/2021
03/11/2020	Patron	00192-2020	Investigation		National Origin, Sexual Orientation	Closed	04/14/2021

Date Received	Source Of Complaint	Case Number	Allegation Outcome	Substantiated	Basis Of Discrimination	Review Status	Initial Closure Date
5/07/2020	Patron	00282-2020	Investigation	Unsubstantiated	National Origin	Closed	11/25/2020
05/15/2020	Patron	00292-2020	Investigation		Race	Closed	02/26/2021
06/02/2020	Patron	00313-2020	Investigation	Unsubstantiated	Race	Closed	08/12/2021
06/23/2020	Patron	00376-2020	Investigation	Unsubstantiated	Race	Closed	06/09/2021
06/26/2020	Patron	00373-2020	Inquiry		National Origin	Closed	04/22/2021
06/30/2020	Patron	00375-2020	Inquiry		Race	Closed	08/25/2020
07/06/2020	Patron	00386-2020	Investigation	Unsubstantiated	National Origin	Closed	02/25/2021
07/08/2020	Patron	00387-2020	Investigation	Unsubstantiated	Race	Closed	11/16/2020
07/26/2020	Patron	00421-2020	Referred	Unsubstantiated	Race	Closed	08/05/2020
07/27/2020	Patron	00419-2020	Informal Resolution		National Origin	Closed	11/02/2021
08/12/2020	Patron	00464-2020	Investigation		Color, Race	Closed	02/23/2021
08/12/2020	Patron	00477-2020	Inquiry		Race	Closed	08/20/2020
08/17/2020	Patron	00516-2020	Investigation		Race	Closed	04/14/2021
08/27/2020	Patron	00523-2020	Investigation		Race	Closed	02/19/2021
09/08/2020	Patron	00515-2020	Informal Resolution		National Origin, Other	Closed	03/31/2021
10/08/2020	Patron	00602-2020	Informal Resolution		Race, Retaliation, Other	Closed	11/10/2020
10/09/2020	Patron	00584-2020	Investigation		Race, Color	Closed	06/14/2021
12/22/2020	Patron	00001-2021	Investigation		Disability, National Origin	Closed	06/23/2022
01/15/2021	Patron	00035-2021	Investigation		Race, National Origin, Age (40 and over), Color	Closed	02/09/2022
01/28/2021	Patron	00055-2021	Investigation	Unsubstantiated	Race	Closed	08/16/2021
02/03/2021	Patron	00074-2021	Investigation	Substantiated	Race	Closed	07/02/2021
03/17/2021	Patron	00144-2021	Investigation		Race	Closed	10/29/2021
03/19/2021	Patron	00157-2021	Informal Resolution	Substantiated	National Origin	Closed	06/28/2021
04/12/2021	Patron	00196-2021	Investigation	Substantiated	Race	Closed	08/16/2021
04/13/2021	Patron	00198-2021	Investigation	Unsubstantiated	Race	Closed	08/16/2021

Date Received	Source Of Complaint	Case Number	Allegation Outcome	Substantiated	Basis Of Discrimination	Review Status	Initial Closure Date
04/21/2021	Patron	00222-2021	Investigation	Substantiated	National Origin, Disability	Closed	10/29/2021
05/04/2021	Patron	00366-2021	Investigation		National Origin	Closed	07/27/2021
06/29/2021	Patron	00393-2021	Investigation	Unsubstantiated	National Origin	Closed	10/07/2021
07/05/2021	Patron	00391-2021	Investigation		Race, Color	Closed	08/11/2021
07/08/2021	Patron	00405-2021	Investigation		National Origin, Religion	Closed	06/02/2022
07/12/2021	Patron	00404-2021	Investigation		Race	Closed	02/14/2022
07/26/2021	Patron	00423-2021	Investigation		Race	Closed	05/11/2022
08/02/2021	Patron	00441-2021	Investigation	Unsubstantiated	Color, Race	Closed	10/29/2021
09/02/2021	Patron	00510-2021	Investigation		Race	Closed	06/06/2022
09/03/2021	Patron	00509-2021	Investigation	Unsubstantiated	Race, Sexual Orientation	Closed	09/27/2021
09/03/2021	Patron	00509-2021	Investigation	Substantiated	Race, Sexual Orientation	Closed	09/27/2021
09/13/2021	Patron	00511-2021	Investigation		National Origin	Closed	05/12/2022
09/16/2021	Patron	00520-2021	Investigation		Race	Closed	05/12/2022
09/27/2021	Patron	00530-2021	Investigation		Race	Closed	05/04/2022
12/20/2021	Patron	00678-2021	Inquiry		Race	Closed	01/31/2021
12/21/2021	Patron	00669-2021	Inquiry		Race	Closed	05/20/2022
03/07/2022	Patron	00100-2022	Inquiry		National Origin	Closed	06/15/2022
04/06/2022	Patron	00225-2022	Investigation		Race	Closed	05/05/2022
06/08/2022	Patron	00273-2022	Inquiry		National Origin, Sex	Closed	06/08/2022

Public Participation Plan

Pursuant to FTA Title VI regulations and FTA guidance 4702.1B, Metro made minor updates to its Public Participation Plan. This Public Participation Plan has been updated and assembled to capture the methods, innovations and measurements of the agency's commitment to not just meet, but exceed the prescribed requirements of the FTA Circular 4702.1B, citing Metro's responsibilities to Limited English Proficient (LEP) Persons, minority communities, low-income communities, and communities with disabilities. Additionally, the Public Participation Plan integrates principles of FTA Circular 4703.1, guiding Metro on integrating principles of Environmental Justice (EJ) into the transportation decision-making process as well as Federal Highway Administration's (FHWA) Title VI requirements and The Age Discrimination Act of 1975. Furthermore, Metro has integrated its Equity Platform in the public participation 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. The Public Participation Plan is included in this section along with an Executive Summary of Metro's public participation and outreach efforts since October 2019.

This section summarizes the Los Angeles County Metropolitan Transportation Authority's public outreach on the 2022 Public Participation Plan and public engagement undertaken from July 2019 through June 2022. During this reporting period we developed, coordinated, and documented outreach and public involvement activities for multiple transit and highway studies, construction projects, joint development and transit-oriented communities, projects and programs in operations, transit safety programs, accessibility outreach, active transportation, and the Long-Range Transportation Plan.

Public Participation Plan – Executive Summary

Los Angeles County Metropolitan Transportation Authority Public Participation Plan and Projects, Programs, Initiatives Outreach Overview July 2019 to June 2022

2022 Public Participation Plan

Every three years Metro updates the Public Participation Plan per the requirements listed above. Since the last update in 2019, the Plan was re-released in April 2022 for the public to review and provide input. The Draft 2022 Plan and its draft revisions included:

- > Metro’s Equity Platform Framework
- > Community Based Organization (CBO) Partnering Strategy
- > Update to Minimum Baseline Threshold for Public Outreach
- > The implementation of virtual outreach due to the onset of the COVID-19 global pandemic, “Safer At Home”, and other public health orders
- > Metro’s Advisory Body Compensation Policy
- > Organizational changes to Metro’s Community Relations Department; and,
- > Updated case studies that reflect Metro’s commitment to reach the public in ways beyond traditional methods of outreach.

Metro sought input from the public for the Plan from April 27, 2022 to May 27, 2022, to ensure we are doing the best we can to inform the public about Metro projects, programs and initiatives. Metro staff received 43 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 updates incorporated in the Final Plan (in the Appendix section) include:

- > Added “Community Advisory Council” as title reference for the Citizens Advisory Council (see page 20)
- > Added “Virtual/Hybrid Meetings” and “Education/Training” to Community Engagement Methods Toolbox (see page 34)
- > Added Sustainability Council to Metro Advisory Groups (see page 21)
- > Added On the Move Riders to our Stakeholder Engagement efforts (see page 16)

Metro appreciates all the input received on the 2022 Public Participation Plan and looks forward to how it will continue to serve as a guide for implementing public engagement programs for the entire agency.

Projects, Programs, and Initiatives Outreach Overview

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

The following list identifies all projects for which public outreach activities were performed during the period of July 2019 through June 2022.

Planning-Transit, Regional Rail, Highways

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

- > Westside/Central Region
 - Sepulveda Pass Transit Corridor Study
 - Crenshaw Northern Extension Project
 - Link Union Station
 - Vermont Bus Rapid Transit Corridor
 - Los Angeles Aerial Rapid Transit
 - Arts District 6th Street Station

- > Gateway Cities Region
 - West Santa Ana Branch
 - I-710 Corridor Project EIR/EIS

- > South Bay Region
 - Airport Metro Connector/96th Street Transit Station
 - Green Line Extension to Torrance

- > San Gabriel Region
 - Eastside Transit Corridor Phase 2
 - Gold Line Foothill Extension, Phase 2

Highway Projects and Studies

- > I-5 Improvements in North County
- > I-105 Express Lanes Project
- > SR 710 North Study
- > I-110 Adams Terminus Improvements Project

Under Construction

- > Purple Line Extension, Ph. 1, 2, 3

- > Regional Connector
- > Crenshaw/LAX Transit Corridor Project
- > East San Fernando Valley Transit Corridor
- > Center Street Eastside Access Improvements

Joint Development and Transit Oriented Communities

- > Boyle Heights
- > Expo/Crenshaw Station
- > North Hollywood Station
- > Willowbrook/Rosa Parks Station
- > El Monte
- > Taylor Yard
- > Vermont/Santa Monica Station
- > Union Station Commercial Development

Active Transportation

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

Transit Safety Programs

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

Projects, Programs, Plans and Studies in Operations

- > Emergency Security Operations Center
- > Metro Diversity and Economic Opportunity Department (DEOD)
- > Metro Parking Management Program
- > Metro Rail Operations
- > Metro Bus Operations
- > Vision 2028
- > Accessibility Outreach
- > Abilities Expo

Committees and Councils

- > Accessibility Advisory Committee*
- > Local Service Councils*
- > Citizens Advisory Council*
- > Technical Advisory Committee*
- > Transportation Business Advisory Council*
- > I-710 Task Force
- > Metro Policy Advisory Council*
- > Public Safety Advisory Committee*
- > Metro Youth Council
- > Regional Connector Community Leadership Council
- > Crenshaw/LAX Transit Corridor Community Leadership Council
- > Regional Faith Leaders Roundtable

*Advisory Committees included in Minority Participation breakdown section.

Outreach Overview

Based on the projects, programs and initiatives listed above, Metro staff has conducted or participated in over 1000+ community meetings, briefings, or events throughout Los Angeles County between 2019 and 2022. Additionally, Metro enhances outreach efforts through digital communications, with over 400,000 email subscribers receiving Metro project updates, newsletters, or announcements; and over 1,000,000 people reached through Metro's social media platforms. Metro's reach in the County is further augmented through daily stakeholder interactions with daily system riders and Metro's robust Customer Care department.



1000+ Public Outreach Activities

- Community Meetings
(Public Hearings, Workshops, Roundtables)
- Briefings (Individual, Elected Officials)
Events (Pop Up, Tabling)



1 million + reached via

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



258,000 + stakeholders signed up to our projects email distribution lists

- Email blasts
- Newsletters
- Announcements

Stakeholders

Metro plans, funds, constructs, operates, and maintains public transportation for 4,751 square miles of land area for the benefit of nearly 10 million residents, making it the most populous of California's 58 counties. The remainder of Southern California's surrounding counties adds more than 11 million residents to comprise a greater regional population totaling over 21 million. Agency accountability for conveying information to the people of the 88 cities and the unincorporated areas that lie within LA County's borders requires a commitment to appreciate the diverse composition of stakeholders who have been identified in American Community Survey data as African American/ Black 7.8%, American Indian/ Alaskan Native 0.2%, Asian 14.6%, Native Hawaiian/ Other Pacific Islander 0.2%, Hispanic or Latino 48.3%, White 25.9%, and a broad spectrum of ethnicities that make up the remaining 3%. Additionally, 32 languages with multiple dialects have been identified with 1,000 or more language practitioners. LA County is a multi-cultural environment and a transportation hub for the region, the state, and the world.

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



Gateway Cities

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

San Fernando Valley

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

San Gabriel Valley

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

South Bay Cities

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

Westside/Central

The cities of Beverly Hills, Culver City, Los Angeles, Malibu, Santa Monica, and West Hollywood.

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

4. Meaningful Access to Limited English Persons

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

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

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

In 2022, Metro updated the Four Factor Analysis in order to determine the language assistance needs of our stakeholders. Metro then utilized the results of the updated Four Factor Analysis to create a language assistance plan detailing the level of appropriate language outreach. The Language Assistance Plan highlights the ways in which Metro is committed to providing language assistance to our customers.

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

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

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



Metro™

**Los Angeles County Metropolitan Transportation Authority
(Metro) –**

LEP Four-Factor Analysis

2022 Title VI Program Update



INTRODUCTION

BACKGROUND

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

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

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. 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.

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

Which purpose is to 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 USDOT Title VI regulations the Community Connections, LLC (contractor) team will conduct qualitative research with 8 community-based organizations representing 10 different language groups in the second-largest metropolitan area in the United States, Los Angeles. Various discussion questions from moderator’s discussion guide opened up each focus group with Metro information to spark conversation and closed with a survey completed by each attendee. Additionally, an online survey was executed with Metro employees who have regular contact with LEP persons during their daily work routine.

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

The 2022 Factor 1 Analysis found that there are 8 specific languages in Los Angeles County with more than 1,000 individuals who are limited English proficient. In addition, Metro wants to add the Ukrainian and the Afghani LEP community bringing the total to ten language groups for the 2022 update and to exclude the Filipino, Thai, Cambodian, Hindi, Portuguese, French and Sub-Saharan African LEP community from this report. The focus group meetings are to be conducted in English with language translation services available. At least two participants in each LEP focus group need to be Metro customers.

The following table lists all the LEP language populations in Los Angeles County.

Languages in Los Angeles County with more than 1,000 LEP Persons

Language Spoken at Home (Age 5 and older)	Total Pop	LEP Pop = Less than Well		
		Number	Pct of Total Pop	Pct of LEP Pop
Total Population	9,474,066			
Speak only English	4,093,221			
Speak language other than English	5,305,045	1,323,578	13.97%	135.80%
<i>Spanish</i>	3,731,336	974,660	23.81%	100.00%
<i>Chinese</i>	376,716	127,687	3.12%	13.10%
<i>Korean</i>	182,279	63,749	1.56%	6.54%
<i>Armenian</i>	169,250	42,783	1.05%	4.39%
<i>Vietnamese</i>	86,088	29,695	0.73%	3.05%
<i>Persian, Iranian, Farsi</i>	77,018	16,017	0.39%	1.64%
<i>Filipino, Tagalog</i>	237,075	15,698	0.38%	1.61%
<i>Russian</i>	48,752	11,170	0.27%	1.15%
<i>Japanese</i>	51,661	10,332	0.25%	1.06%
<i>Hindi and related</i>	91,626	8,143	0.20%	0.84%
<i>Thai, Siamese, Lao</i>	24,356	6,305	0.15%	0.65%
<i>Arabic</i>	45,915	6,079	0.15%	0.62%
<i>Indonesian</i>	13,033	2,284	0.06%	0.23%
Burmese, Lisu, Lolo	4,950	1,234	0.03%	0.13%
<i>French</i>	43,815	1,099	0.03%	0.11%
Micronesian, Polynesian	9,383	946	0.02%	0.10%
Portuguese	12,007	903	0.02%	0.09%
Amharic, Ethiopian, etc.	7,932	861	0.02%	0.09%
<i>Hebrew, Israeli</i>	24,277	858	0.02%	0.09%
<i>Italian</i>	15,209	776	0.02%	0.08%
Serbo-Croatian, Yugoslavian, Slavonian	5,695	679	0.02%	0.07%
<i>Sub-Saharan Africa</i>	13,075	618	0.02%	0.06%
<i>German</i>	22,177	494	0.01%	0.05%
Greek	6,066	405	0.01%	0.04%
Dutch	5,354	103	0.00%	0.01%

Factor 2: The frequency of contacts with limited English proficiency (LEP) individuals.

Factor 3: Assess the importance of Metro’s Programs, activities or services.

DATA ANALYSIS

For purposes of the 2022 LEP Study and Report for LACMTA, the Community Connections team is using American Community Survey (ACS) dataset and the data collected during the community-based organizations focus groups/interviews for the triennial report.

OBJECTIVE

The Los Angeles County Metropolitan Transportation Authority (Metro) contracted with Community Connections to conduct two of the four factor analyses for a Limited English Proficiency (LEP) study to satisfy the requirements of Metro’s Title VI Program Update. The Contractor performed the two following analyses as part of a four-factor analysis for Limited English Proficiency in Metro’s Service Area: 1) Factor 2, The Frequency of Contacts with LEP Individuals and 2) Factor 3, Assess the Importance of Metro’s Programs, Activities or Services. Metro will complete Factor 1 and Factor 4 in-house.

Metro prepares its Title VI plan triennially with the last update done in 2019. According to the US Department of Transportation's (USDOT) guidance concerning persons with LEP, the extent of the federally funded recipient’s obligation to accommodate LEP populations is determined by balancing the following four factors:

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

Contractor to work with Community Based Organizations (CBOs) to conduct enough LEP Focus Group meetings to study the frequency of contacts between Metro and LEP individuals. Metro staff estimated the number of focus groups to be 10, but it may take more or less. Contractor is responsible for ensuring that all applicable LEP language populations are included in focus groups. Contractor to partner with CBOs to recruit LEP persons to participate in focus groups via CBO communications, targeted emails and targeted phone calls. Metro also provided Contractor with the Factor 1 Analysis: Identification of LEP Persons in the Metro Service Area.

The Contractor will conduct a written survey to be distributed and collected in each focus group to determine Metro’s frequency of contacts with LEP Individuals.

The Contractor will conduct an online LEP Customer Experience survey of Metro Transportation Operations Supervisors and Freeway Patrol Supervisors to determine the frequency of contacts with LEP Individuals. As part of the survey, the Contractor will also collect data on the frequency of contact with LEP persons.

The Contractor will also conduct an online Customer Interaction survey to be distributed to a broad range of Metro Employees who interface with the public and who likely have interaction with the LEP population. The Contractor will produce promotional emails and other correspondence for Metro Employees to enhance survey participation. The survey will collect data on the following sources to determine the frequency of contact with LEP individuals, the language used and requests for language translation services:

- Do they speak a language other than English?
- List all languages, other than English, that they speak fluently.
- What non-English languages have they encountered in their role at Metro where they needed assistance?
- What non-English languages have they used to conduct Metro business?
- Are they willing to use the non-English language(s) that they speak to conduct Metro business?

APPLICABILITY TO CONTRACTORS

Contractors and subcontractors are responsible for complying with the Title VI Program of the recipient with whom they are contracting. In this case, Community Connections, as the contractor is responsible for the data collection and analysis for LEP Limited English Proficiency in compliance of the Title VI of the Civil Rights Act.

CONTENTS OF THE LEP STUDY

In compliance of the Title VI Program LA METRO has a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

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 the 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 to involve minority and LEP populations in public participation activities include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process.

FTA has developed a Circular, 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients," that includes many examples of effective strategies for engaging minority and low-income populations. FTA encourages recipients to review that Circular for ideas when developing their public engagement strategy. Some of those effective practices include:

- a. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- b. Employing different meeting sizes and formats.

- c. Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- d. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients 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 Circular contains only a summary of the LEP requirements as they apply to FTA recipients; recipients are encouraged to review DOT's LEP guidance for additional information (70 FR 74087, Dec. 14, 2005) <http://www.gpo.gov/fdsys/pkg/FR-2005-12-14/pdf/05-23972.pdf>. 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.

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 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 of such provision that LA METRO has contracted Community Connections to conduct the data collection and survey for LEP Limited English Proficiency beneficiaries, subject matter of the present report.

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

- **An online LEP Customer Experience survey of Metro Employees to determine the frequency of contacts with LEP individuals that speak a language other than English and the non-English languages they encountered in their role at Metro.**
- **Conduct Focus Group (FG) sessions with LEP individuals.**
- **Completion of a self-administered survey for all LEP individuals that participated in a FG session.**

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, a survey was administered to Metro employees to determine the fluency with non-English languages and other than English spoken languages commonly conducting Metro business with Limited English Proficiency (LEP) individuals as well as to a broad range of Metro Employees who interact with the public and who likely interact with this population as well. Metro distributed a link to the online survey, and it was in field from April 14, 2022 to April 27, 2022.

Survey Questions:

1. Do you speak a language other than English?
2. Please list all languages, other than English, that you speak fluently:
3. What non-English languages have you encountered in your role at Metro that you needed to get assistance in?
4. What non-English languages have you used to conduct Metro business?
5. Are you willing to use the non-English language(s) that you speak to conduct Metro business?

2.2 Employee Survey Findings

1. A majority of the 440 Metro employees questioned for this survey, responded that they do speak a language other than English.

Do you speak a Language other than English?

	Choice	Response Percent	Response Total=440
1	Yes	55.68 %	245
2	No	44.32 %	195

2. Spanish, Mandarin, Cantonese, French and Tagalog are the top 5 languages other than English spoken commonly of the 244 Metro employee respondents (262 responses), with Spanish language overwhelmingly the top language at 47.71% and the Mandarin language a distant second at 4.96%. (196 non-respondents).

Please list all languages, other than English, that you speak fluently.

	Choice	Response Percent	Response Total
1	Arabic	2.29 %	6
2	Armenian	3.05 %	8
3	ASL	0.38 %	1
4	Azeri (Turkic language)	0.38 %	1
5	Bengali (Eastern Indo-Aryan language)	0.38 %	1
6	Cambodian	1.15 %	3
7	Cantonese	4.58 %	12
8	Castilian (Indo-European language)	0.38 %	1
9	Farsi	3.83 %	10
10	French	4.20 %	11
11	German	1.53 %	4
12	Gujarati (Indo-Aryan language)	0.38 %	1
13	Hawaiian (Polynesian language)	0.38 %	1
14	Hebrew	0.77 %	2

15	Hindi	2.67 %	7
16	Indonesian	0.38 %	1
17	Japanese	0.38 %	1
18	Korean	1.91 %	5
19	Mandarin	4.96 %	13
20	Panglatok (Filipino language)	0.38 %	1
21	Persian	1.91 %	5
22	Portuguese	1.15 %	3
23	Punjabi	2.29 %	6
24	Russian	0.77 %	2
25	Spanish	47.71 %	125
26	Sinhala (Middle Indo-Aryan language)	0.77 %	2
27	Swahili	0.38 %	1
28	Tagalog	4.20 %	11
29	Telugu (Dravidian language)	0.38 %	1
30	Thais	0.38 %	1
31	Turkish	0.38 %	1
32	Ukrainian	0.38 %	1
33	Urdu (Indo-Aryan language)	1.53 %	4
34	Vietnamese	2.29 %	6
35	Visayan (Filipino language)	0.77 %	2
36	Welch	0.38 %	1

3. Spanish, Chinese*, Korean, Mandarin, and Tagalog are the top 5 non-English languages of the 192 Metro employee responses. In addition, 195 Metro employees left the response blank, 100 responded None, 20 responded N/A, and 9 non-responsive (No language listed). The Spanish language was the top language at 32.81%, followed by Chinese at 13.54% and Korean at 8.33%.

What Non-English Languages have you encountered in your role at Metro that you needed to get assistance in?

	Choice	Response Percent	Response Total
1	Arabic	1.56 %	3
2	Armenian	4.69 %	9
3	ASL	1.04 %	2
4	Cambodian	0.52 %	1
5	Cantonese	2.08 %	4
6	Chinese*	13.54 %	26
7	Farsi	2.60 %	5
8	French	1.56 %	3
9	Hindi	0.52 %	1
10	Indian	0.52 %	1
11	Italian	1.04 %	2
12	Japanese	3.65 %	7
13	Korean	8.33 %	16
14	Khmer	1.04 %	2
15	Mandarin	6.25 %	12
16	NIL (Dialect of the language LISP)	0.52 %	1
17	Portuguese	0.52 %	1
18	Russian	4.69 %	9
19	Spanish	32.81 %	63
20	Tagalog	6.77 %	13
21	Tugaloo (Filipino Language)	0.52 %	1
22	Urdu (Indo-Aryan language)	0.52 %	1
23	Vietnamese	4.69 %	9

*Chinese can be inferred as either a Mandarin or Cantonese language response.

4. Spanish, Tagalog, Armenian, Chinese*, Korean & French are the top 5 non-English languages of the 162 responses. In addition, 195 Metro employees left the response blank, 77 responded None, 17 responded N/A, and 4 non-responsive (No language listed). The Spanish language was the overwhelming top language at 64.20%, followed by Tagalog at 8.02% and Armenian at 4.32%.

What Non-English Languages have you used to conduct Metro business?

	Choice	Response Percent	Response Total
1	Armenian	4.32 %	7
2	ASL	0.61 %	1
3	Cambodian	0.61 %	1
4	Cantonese	0.61 %	1
5	Chinese*	4.32 %	7
6	Farsi	1.85 %	3
7	French	3.09 %	5
8	German	1.23 %	2
9	Hindi	0.61 %	1
10	Italian	0.61 %	1
11	Japanese	0.61 %	1
12	Korean	3.09 %	5
13	NIL (Dialect of the LISP)	0.61 %	1
14	Persian	1.23 %	2
15	Russian	1.23 %	2
16	Spanish	64.20 %	104
17	Tagalog	8.02 %	13
18	Urdu	1.23 %	2
19	Vietnamese	1.23 %	2
20	Visayan (Filipino Language)	0.61 %	1

*Chinese can be inferred as either a Mandarin or Cantonese language response

5. An overwhelming majority of the 440 Metro employees questioned for this survey, responded that they would use non-English language(s) to conduct Metro business? 195 Metro employees left the response blank.

Are you willing to use the non-English language(s) that you speak to conduct Metro business?

	Choice	Response Percent		Response Total=245
1	Yes	85.71 %		210
2	No	14.29 %		35

2.3 LEP Individuals Self-Administered Survey

Approach

8 focus group discussions with LEP individuals were scheduled with community-based organizations, the Russian focus group was conducted both in person and via Zoom. A self-administered survey was completed by all participants who attended in person. The facilitator gathered the surveys to collect the data for this report on their Metro Usage, Metro Services, and their Satisfaction with Metro. The survey was in English and translated either prior to or during each session and consisted of 18 open and closed-ended questions and administered after the group discussion. An employee of each CBO was asked to have an interpreter present to assist respondents in completing the survey for their language group.

The timeframe the focus groups were conducted were from June 7, 2022 through June 30, 2022.

A total of 110 people completed the survey with representation from 10 language groups in Los Angeles County.

Findings

LEP riders take an average of 10 one-way trips per month on the 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=	110	110	110
0	55%	35%	75%
1 – 3	24.5%	35%	14%
4 – 5	4.5%	9%	0%
6 – 10	12%	13%	9%
11 – 20	2.5%	3%	2%
21 – 50	4%	6%	2%
More than 50	0%	0%	0%
Mean	10.1	14.4	5.8
Approximately how many one-way trips do you take per month on Metro bus/rail? Base: Those who ride that form of transportation.			

Most LEP riders go shopping or run errands (56%) using the Metro. High usage riders are more likely to ride Metro to go Shopping/Errands followed by commuting to Sports/Social Outings/Recreation and Home. The majority of other responses, riders used Metro for Doctors' appointments.

	<i>Total</i>	<i>Total</i>
Where going		
	N=	110
Shopping/Errands		56%
Sports/Social		25%
Outings/Recreation		
Home		24%
Work		21%
Other		11%
School		7%
No answer		1%
Please tell us where you are going when you are using public transportation. (Multiple responses were accepted)		

LEP riders give high scores for their satisfaction with the Metro bus (67%) and rail (68%). Top-2-box ratings are slightly higher for rail than the bus.

	<i>Total</i>
Satisfaction	
	N= 85
Metro Bus – top-2-box	67%
Metro Bus – mean score	3.6
Metro Rail – top-2-box	68%
Metro Rail – mean score	4.1
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 give high top-2-box ratings for the ease of using Metro bus/rail, with Metro bus (67%) receiving slightly higher top-2-box ratings than rail (66%).

	<i>Total</i>
Easy/Difficult to Use	
	N= 97
Metro Bus – top-2-box	67%
Metro Bus – mean score	3.5

Metro Rail – top-2-box	66%
Metro Rail – mean score	4.0

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)

Slightly less than one-quarter of LEP riders (24%) feel that their limited English contribute to the difficulty or problems they have with using Metro.

		<i>Total</i>
Limited English Source of Difficulty		
	N=	110
Yes		24%
No		43%
No answer		34%
Do you find that you have difficulty or problems using Metro because you speak a limited amount of English?		

Ticket Machine Instructions (26%), Route Maps (20%) and Timetables (20%) are the most difficult of transit information to understand among LEP riders. Slightly less than one-fifth surveyed also indicated station announcements (19%), followed by station signs (15%) having difficulty understanding.

		<i>Total</i>
Transit Information Difficult to Understand		
	N=	129
Ticket Machine Instructions		26%
Route Maps		20%
Timetables		20%
Station Announcements		19%
Station Signs		15%
Other		0%
No answer		23%
Which, if any, of the following transit information do you have trouble understanding? (Multiple responses were accepted)		

Among the list of possible changes that could be made to improve LEP riders' transit experience easier: The majority of respondents indicated signs, brochures and announcements in their native language (36%), followed by translators (20%), multilingual phone lines (18%), and picture signs (17%) each having the next highest percentage for improvement.

		<i>Total</i>
Changes to Improve Transit Experience		
	<i>Total</i>	
	N=	152
Signs, brochures and announcement in native language		36%

Translators	20%
Multilingual phone lines	18%
Picture signs	17%
Website supported by multilingual texts	8%
Other	2%
No answer	22%
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: bus fares, bus routes, proposed service changes, Metro ticket office, signs on the bus, service changes and signs at the bus stop.

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

	<i>Total</i>
N=	110
Bus fares (how much it costs)	3.6
Bus routes (where buses go)	3.5
Proposed service changes	3.4
Metro ticket office	3.3
Signs on the bus	3.3
Service changes	3.2
Signs at the bus stop	3.2
Metro telephone center	3.2
On the radio	3.1
In the newspaper	3.0
Metro website	2.9
Brochures on the bus	2.9
Brochures in the Community	2.8
On the television	2.8

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)

A total of 10 languages were represented in this survey.

Native Language

	N=	110
Japanese		26%
Mandarin (Chinese)		22%
Cantonese (Chinese)		14%
Spanish		10%
Armenian		8%
Korean		6%
Russian		6%
Vietnamese		5%
Farsi		2%
Cambodian		1%
		Total
		100%

What is your native language?

Base: Total

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

	Total
English Skills	
	N= 110
Read – top-2-box	52%
Read – mean score	3.8
Speak/Understand – top-2-box	52%
Speak/Understand – mean score	2.8

How well do you read/speak/understand English? (5-point scale, 5=very well, 1=not at all well)

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

Demographics	Total	High Usage	Low Usage
	N=		110
Gender			
Male			24%
Female			72%
Left blank			4%
Age			
Under 25			5%
25 – 34			5%
35 – 44			3%
45 – 54			11%
55 – 64			11%
65 or older			52%
Left blank			13%
Have a Valid Driver's License?			
Total = 104			
Yes			61%
No			39%
# of Cars Available in Household			
None			25%
1			44%
2			19%
3 or more			7%
Left blank			5%
# of People Living in Household			
1			33 %
2			28%
3			16%
4			9%
5 or more			5%
Left Blank			9%
Annual Household Income			
Under \$15,000			40%
\$15,000 to \$24,999			19%

\$25,000 to \$49,999	15%
\$50,000 to \$74,999	6%
\$75,000 or more	11%
Left blank	9%

2.4 Calls Received through Metro Call Center and Language Assistance Line

English Spanish Calls at Metro Call Centers from July 1, 2019 – June 30, 2022

	Customer Information	TAP Information	Passenger Relations
FY2019	1,481,929	180,791	57,686
English	1,317,550	156,131	50,893
Spanish	164,379	24,660	6,793
FY2020	1,237,140	146,281	45,803
English	1,089,453	125,829	39,741
Spanish	147,687	20,452	6,062
FY2021	956,242	36,083	30,535
English	825,397	32,555	25,297
Spanish	130,845	3,528	5,238
FY2022	1,196,298	132,299	47,544
English	989,977	107,623	38,868
Spanish	206,321	24,676	8,676
	4,871,609	495,454	181,568

Language Assistance Line Calls from January 1, 2019 – March 30, 2022



Organization Report - Language, Duration and

For LACMTA between January 01, 2019 and December 31, 2019

Cost
All Sites

Language	Number of Bookings	% of Total Bookings	Billed Qty	Unit	Cost
Amharic	4	0.18%	30	Min	\$29.40
Arabic	6	0.28%	61	Min	\$59.78
Armenian	118	5.45%	1,307	Min	\$1,280.86
Bengali	1	0.05%	5	Min	\$4.90
Cambodian/Khmer	8	0.37%	60	Min	\$58.80
Cantonese	98	4.53%	1,369	Min	\$1,341.62
Creole	2	0.09%	11	Min	\$10.78
Farsi - Afghani - Dari	17	0.79%	202	Min	\$197.96
French	16	0.74%	184	Min	\$180.32
German	2	0.09%	41	Min	\$40.18
Greek	2	0.09%	24	Min	\$23.52
Hindi	1	0.05%	25	Min	\$24.50
Indonesian	1	0.05%	9	Min	\$8.82
Iranian Farsi / Persian	15	0.69%	162	Min	\$158.76
Italian	4	0.18%	37	Min	\$36.26
Jakartanese	1	0.05%	6	Min	\$5.88
Japanese	108	4.99%	1,286	Min	\$1,260.28
Khmer/Cambodian	1	0.05%	5	Min	\$4.90
Korean	663	30.62%	7,317	Min	\$7,170.66
Mandarin	810	37.41%	9,679	Min	\$9,485.42
Nepali	1	0.05%	13	Min	\$12.74
Portuguese	9	0.42%	104	Min	\$101.92
Punjabi	1	0.05%	5	Min	\$4.90
Romanian	1	0.05%	12	Min	\$11.76
Russian	125	5.77%	1,488	Min	\$1,458.24
Spanish	45	2.08%	503	Min	\$472.82
Tagalog	13	0.60%	120	Min	\$117.60
Taiwanese	1	0.05%	10	Min	\$9.80
Thai	18	0.83%	175	Min	\$171.50
Tigrinya	2	0.09%	34	Min	\$33.32
Urdu	1	0.05%	4	Min	\$3.92
Vietnamese	70	3.23%	901	Min	\$882.98

Grand Total

Total Number of Bookings	Total Qty	Total Cost
2,165	25,189	\$24,665.10

Language	Number of Bookings	% of Total Bookings	Billed Qty	Unit	Cost
Amharic	2	0.22%	12	Min	\$11.76
Arabic	5	0.54%	44	Min	\$43.12
Armenian	54	5.88%	604	Min	\$591.92
Burmese	1	0.11%	12	Min	\$11.76
Cambodian/Khmer	4	0.44%	32	Min	\$31.36
Cantonese	29	3.16%	253	Min	\$240.10
Farsi - Afghani - Dari	4	0.44%	35	Min	\$34.30
French	4	0.44%	39	Min	\$38.22
German	1	0.11%	11	Min	\$10.78
Hindi	1	0.11%	2	Min	\$1.96
Indonesian	1	0.11%	20	Min	\$19.60
Iranian Farsi / Persian	9	0.98%	145	Min	\$134.26
Italian	1	0.11%	17	Min	\$16.66
Japanese	36	3.92%	423	Min	\$400.82
Korean	232	25.24%	2,414	Min	\$2,299.08
Mandarin	333	36.24%	3,531	Min	\$3,393.74
Portuguese	1	0.11%	4	Min	\$3.92
Russian	88	9.58%	968	Min	\$948.64
Spanish	44	4.79%	506	Min	\$475.64
Tagalog	3	0.33%	31	Min	\$30.38
Taiwanese	3	0.33%	13	Min	\$12.74
Thai	8	0.87%	87	Min	\$85.26
Tigrinya	1	0.11%	14	Min	\$13.72
Urdu	1	0.11%	3	Min	\$2.94
Vietnamese	53	5.77%	418	Min	\$400.82

Grand Total

Total Number of Bookings	Total Qty	Total Cost
919	9,638	\$9,253.50

Language	Number of Bookings	% of Total Bookings	Billed Qty	Unit	Cost
Arabic	6	0.38%	46	Min	\$45.08
Armenian	105	6.66%	1,190	Min	\$1,166.20
Armenian, Western	1	0.06%	5	Min	\$4.90
Cambodian/Khmer	2	0.13%	20	Min	\$19.60
Cantonese	39	2.47%	364	Min	\$356.72
Farsi - Afghani - Dari	5	0.32%	45	Min	\$44.10
French	2	0.13%	22	Min	\$21.56
Iranian Farsi / Persian	7	0.44%	81	Min	\$79.38
Japanese	59	3.74%	609	Min	\$596.82
Korean	162	10.27%	1,904	Min	\$1,865.92
Mandarin	345	21.88%	3,438	Min	\$3,369.24
Portuguese	1	0.06%	14	Min	\$13.72
Russian	119	7.55%	1,315	Min	\$1,288.70
Spanish	655	41.53%	5,225	Min	\$4,911.50
Tagalog	14	0.89%	159	Min	\$155.82
Thai	5	0.32%	36	Min	\$35.28
Tigrinya	1	0.06%	8	Min	\$7.84
Uzbek	1	0.06%	33	Min	\$32.34
Vietnamese	48	3.04%	515	Min	\$504.70
Grand Total					
	Total Number of Bookings		Total Qty		Total Cost
	1,577		15,029		\$14,519.42

Language	Number of Bookings	% of Total Bookings	Billed Qty	Unit	Cost
Amharic	1	0.18%	16	Min	\$15.68
Arabic	3	0.53%	31	Min	\$30.38
Armenian	42	7.42%	465	Min	\$455.70
Cantonese	35	6.18%	388	Min	\$380.24
Farsi - Afghani - Dari	5	0.88%	87	Min	\$85.26
French	1	0.18%	15	Min	\$14.70
Iranian Farsi / Persian	3	0.53%	37	Min	\$36.26
Italian	1	0.18%	13	Min	\$12.74
Japanese	19	3.36%	176	Min	\$172.48
Javanese	1	0.18%	8	Min	\$7.84
Korean	166	29.33%	1,854	Min	\$1,816.92
Mandarin	185	32.69%	2,047	Min	\$2,006.06
Polish	2	0.35%	33	Min	\$32.34
Russian	63	11.13%	627	Min	\$614.46
Spanish	5	0.88%	22	Min	\$20.68
Tagalog	5	0.88%	78	Min	\$76.44
Thai	1	0.18%	2	Min	\$1.96
Vietnamese	28	4.95%	345	Min	\$338.10

Grand Total

Total Number of Bookings	Total Qty	Total Cost
566	6,244	\$6,118.24

2.7 Factor 2 Conclusions

These are several conclusions that can be made from the survey results: A total of 440 surveys for Metro employees were completed. 41% of the Metro employees used non-English languages with business operations. 110 LEP individuals participated in the survey answering questions regarding; Metro Usage, Metro Services, Satisfaction with Metro, and Critical Public Services. The results are presented below:

- A majority of Metro employees (56%) speak a language other than English.
- A majority of Metro employee respondents (60%) speak another language fluently other than English.
 - Spanish (48%) is the overwhelming language spoken by Metro employees surveyed, followed by Mandarin (5%) and Cantonese (5%).
- Less than half of the Metro employee respondents (44%) needed assistance with non-English languages in their position at Metro.
 - Spanish (33%) is the language most frequently spoken by Metro employees surveyed, followed by Chinese* (14%) and Korean (8%). *Chinese can be inferred as either Mandarin or Cantonese.
- Slightly over a third of the Metro employee respondents (37%) used a non-English language to conduct Metro business.
 - Spanish (33%) is the language most frequently spoken by Metro employees surveyed, followed by Chinese* (14%) and Korean (8%). *Chinese can be inferred as either Mandarin or Cantonese.
- An overwhelming majority of the Metro employees (86%) are willing to use non-English language(s) that they speak to conduct Metro business.
- LEP riders take the Metro bus or rail moderately (an average of 10 one-way trips per month), with the bus being taken more often than the rail.
 - 14.4% of LEP riders take the bus at least once per month compared to 5.8% who take the rail at least once per month.
- The most common destination respondents go using the Metro bus/rail is for shopping or run errands 56%.
 - Not surprisingly, high usage riders report using the Metro bus/rail to go shopping/run errands, to Sports/Social Outings/Recreation 25% and to travel home 24% than low usage riders more than likely because they are familiar with the system and routes, and it becomes second nature to not drive their cars for Shopping/Errand trips.
- Satisfaction with Metro 85 responded and ease of use 97 responded higher among high usage riders.
 - 67% of LEP riders are satisfied with Metro rail compared to 66% who are satisfied with Metro bus.
 - 67% of LEP riders that find it easy to use Metro bus, while 66% rate Metro rail as easy to use.
- The majority of LEP riders (43%) do not feel that their limited English skills make it difficult for them to use Metro. However, respondents feel their English skills are good, 24% state it is a problem. More than half of the respondents provided a top 2 box rating for reading 52% and speak/understand at 52%. (The percentage of 52% efficiency for reading and speak/understand may be due to comprehension and language articulation.)
- The top surveyed Metro changes that would improve the LEP rider's experience: Signs, brochures, and announcements at 36%, Translators 20%, Multilingual phone lines 18%, and Picture signs 17%.

- The most important information to receive and view in their native language; Bus fares, Bus routes, Proposed service changes, Metro ticket office, Signs on the bus, and Service changes.
- **Based on the languages that Metro frequently encounters, these continue to be Spanish, Armenian, Chinese, Japanese, Korean, Russian and Vietnamese.**

3.0 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 were conducted.

Qualitative Discussions

3.1 Approach to Qualitative Discussion

In an effort to hold discussions, focus groups were conducted with eight of the top LEP language groups represented in Los Angeles County. The project team reached out to community-based organizations within the top languages in Los Angeles County with more than 1,000 LEP persons of the language spoken at home and per Metro's direction. Outreach was conducted to reach Russian, Vietnamese, Armenian, Korean, Spanish, Cantonese, Mandarin, Japanese, Ukrainian and Afghani. 20+ organizations were contacted via email, phone calls and leaving voice messages and messages with assistants, inviting them to participate in this research effort. Focus groups were conducted by all LEP groups with the exception of the Ukrainian and Afghani population groups. Numerous calls, emails, messages were left with four community-based organizations that were interested to help, however, as time went by, they became extremely busy with events to help their members and with the earthquake in Afghanistan, our calls went unanswered, and we were eventually told they could not help at this critical time. Plus, COVID was also paying a part in the reopening of their offices not until early July. We went as far as reaching out to several of the non-profit employees on LinkedIn. However, the focus group with Jewish Services Los Angeles we in Russian, with one Ukrainian attending virtually, unfortunately we were unable to get a survey completed by the Ukrainian participant. We participated as part of another community meeting, and it was too difficult for the translator to help the Ukrainian attendee since she was already translating in the Russian language.

The organizations that we reached out to for the Ukrainian and Afghani communities included Tiyya Foundation, The International Rescue Committee, and the International Institute of Los Angeles.

A total of 8 focus groups were organized representing 9 of Los Angeles' most Limited English Proficiency (LEP) language groups. All 8 groups were held in person at the non-profit office, two were held at a park in close proximity to the non-profit (to be COVID safe), and one was conducted virtually. An interpreter/translator was present at each discussion group, and heavily relied on for each session so the message was clear, and responses were concise.

Focus groups ranged in size from 5 to 29 participants ranging in the timeframe from 45 to 60 minutes. The majority of participants received a Metro tap card good for one week of unlimited ridership, the Korean participants chose not to receive a tap card because all of those that were to participate have a monthly senior pass. Additionally, a donation of \$500 was given to each community-based organization that assisted in this effort with 10 or more participants and \$50 per person under 10. An additional \$100 was donated to the CBO for providing an in-house translator/interpreter. The Korean CBO requested an additional \$100 for the translator/interpreter services.

All of the participants that attended the focus groups felt valued and were excited knowing their input was important to Metro and the Department of Transportation and that their responses would be shared in the report.

A total of 110 people were interviewed or participated in a focus group discussion translated in the languages listed:

Native Language	N=
Armenian	9,2*
Farsi*	
Cantonese	15
Japanese	29
Korean	7
Mandarin Cambodian*	24,1*
Russian	7
Spanish	11
Vietnamese	5

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

3.2 Summary of Qualitative Discussions and Interviews

The majority of the LEP population that participated were seniors, due to the fact that they are more likely to be available to attend a focus group during the day as well as the majority being limited English speakers. Over 50% depend on the Metro bus transportation system to get them around town to run errands, go shopping, to get to work as well as for household members to get to school.

The majority of the LEP participants felt that Metro does not do enough in getting information in their language to their communities. Many participants that speak Mandarin, Cantonese, Vietnamese, Korean, Russian and Japanese felt that Metro should translate informational literature into their native language. Comments from most focus group participants with the exception of the Armenian struggled with not knowing where to access information in their native language. The majority would like to see Metro provide information in their language at community non-profit organization offices.

The majority of the seniors mentioned the difficulty in understanding announcements made by the bus driver, and it would be nice if the bus driver had Metro brochures to share in their language. LEP persons take the bus more than rail because their trips are not far from home, however translators and multilingual phone lines would be appreciated in their language.

Those with limited English skills, were primarily those who speak Japanese, Cantonese, Mandarin, Vietnamese, Korean, and Russian. Because of their limited English skills, LEP groups are reluctant to travel to new locations because of their concern asking for a transfer and the bus driver not understanding them. They choose to stay close to home because they usually wait longer for a bus than for a train. They also have found out by family and friends when Metro offers a free day to ride transit and they welcome them.

The senior population struggles to understand their point of destination because they do not know where to purchase tickets, also ticket machines are only in English which makes it very difficult to use. The majority of the attendees were not aware that Metro offers information on their website in their language.

It was determined from both surveys and during the focus groups that Metro employees and LEP riders agree that it is critical that Metro do more to outreach to them. It was also suggested that Metro hire more bilingual bus drivers or those that speak Vietnamese, Mandarin, Cantonese, Armenian, Korean, Russian and Japanese.

Visual materials in their native language are all strategy tools that would improve connectivity to Metro and increase ridership because the riders will no longer feel scared about getting lost on the Metro transit system, which could result in not knowing how to get home. Also, not knowing the frequency of buses due to working the graveyard shift and crowded buses were also top concerns.

They also feel discriminated against when bus drivers let those that do not have all of their fare on the bus, and if they are a few cents short the driver tells them that they cannot get on. They are aware of which groups are catered to and it makes them feel bad.

3.3 Language Group Detail

It is important to note that this engagement task was extremely important to reconnect with the LEP communities due to the limitations with ridership during the COVID-19 pandemic. Each of the LEP groups shared the challenges of acclimating during the pandemic and reacclimating post-pandemic with their transportation needs, level of comfort, safety and the convenience of riding. These community based

organizations understand the importance of information delivery to their community organizations to lessen the burdens on individuals that have difficulty communicating effectively in English.



Armenian/Persian Language Community

The Armenian Society of Los Angeles established in 1956 as a non-profit cultural organization with 1,000 active members and are involved in cultural, humanitarian and educational activities conducted at their center in the City of Glendale. The City of Glendale has the largest Armenian population in the Los Angeles area with a majority speaking Armenian and some that speak Persian/Farsi.

9 of the 11 participants spoke Armenian, with 2 participates primarily speaking Farsi.

Metro Usage

(12) of the participants own a car and use their car most of the time when traveling in the Glendale area. (5) participants use Metro and Glendale transit daily and weekly mainly for work and shopping. The group stated difficulty with transferring from Metro to Glendale transit and vice-versa as a reason for not utilizing public transportation more frequently.

Metro Services

All of the participants stated that they have had no interaction with Metro other on a bus or train. 3 participates were very thankful regarding utilizing Metro Service Patrol tow truck on the freeway. None of participants have attended an information meeting for a highway or transit construction project. One participant mentioned being contacted regarding Highway 101 closure due to improvement project. 3 participants have interacted with the Glendale Beeline and Transit Center.

Satisfaction with Metro

Most participants are dissatisfied with public transportation in the area and stressed concerns with access, fare pricing, scheduling, security and homeless at bus benches. Most participants find that the information produced by Metro to be useful and have no trouble understanding Metro information. Participants commented on their support for Metro leadership especially with Metro Board Chair Ara Najarian.

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

a. Gas – 5, b. Electricity – 5, c. Trash pick-up – 5, d. Mail service - 4



Cantonese Language Community

The Chinatown Service Center (CSC) is one of the largest community-based Chinese American health and human service organizations in Southern California. CSC provides a comprehensive range of services to over 100,000 visits annually, organized under four services areas including Social Services (Senior Services, Welfare, and Benefits Enrollments and Referral programs), Federally Qualified Community Health Center (Behavioral Health, Medical, Dental and Optometry), Youth Center and Community Economic Development (Individual Financial Education and Small Business Training and Consultation).

12 of the 15 participants spoke primarily Cantonese, with 3 participants speaking both Cantonese/Mandarin.

Metro Usage

(6) of the participants own a car and (13) use public transportation. The majority of the participants use the bus as the main means of Metro transportation. The participants use the Metro bus from 2-6 times per week. The ridership is mainly used for shopping.

Metro Services

None of the participants interacted with Metro other than on a bus or train. None of the participants were aware or have used Metro Freeway Service Patrol. None of the participants have attended an information meeting for a highway or transit construction project. 2 participants were contacted regarding the Gold Line Foothill Extension. No participants have interacted with any other transportation agency.

Satisfaction with Metro

Most participants are satisfied with Metro service, but a safer environment would entice riders to consider or use Metro more frequently. The participants also indicated that more accessible stations would be helpful. 1 participant mentioned that some stations located on hills are difficult for seniors to access.

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

a. Gas – 4, b. Electricity – 5, c. Trash pick-up – 3, d. Mail service - 5



Japanese Language Community

The Little Tokyo Service Center (LTSC) is an organization that serves the Japanese community through improving the lives of underserved individuals and families and promoting the equitable development of ethnic communities and their rich heritage. The LTSC is a multipurpose social center providing linguistically and culturally sensitive social services to the Little Tokyo community and broader Japanese American community in Southern California. The organization scheduled a total of 31 participants with extremely limited English proficiency seniors. Interpreters and translation were utilized for the Discussion Guide and Survey.

All 29 participants spoke Japanese.

Metro Usage

A total of (9) individuals own cars and the majority (27) use both bus and rail during the week and weekend for purposes of shopping/errands, doctors' appointments and dining in the Little Tokyo and Los Angeles area.

Metro Services

Majority of participants responded, "No" to the interaction with any of Metro's Services. One individual had attended a Metro Community Engagement event regarding using Tap cards and tour of the LA area. In addition, some individuals use Montebello transit, Gardena transit, Santa Monica transit and DASH for ridership within the greater Los Angeles area and transfer to Metro bus and rail for trips outside of the City.

Satisfaction with Metro

Primarily participants are somewhat satisfied except for problems with TAP card machines, understanding bus schedules, and materials online in Japanese. The suggested improvements for ridership include more security, homelessness, materials and bus schedules in Japanese, and bus frequency and punctuality with routes.

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

- a. Gas – 1, b. Electricity – 5, c. Trash pick-up – 3, d. Mail service - 4



Korean Language Community

The Faith and Community Empowerment (FACE) LA serves as a light and bridge between the Asian American community and the greater at large by connecting and creating private and public collaboration, maximizing the capacities of faith-based organizations and other community non-profits, increasing access to resources and funds, and assisting low-income individuals and revitalizing neighborhoods.

All 7 participants spoke Korean.

Metro Usage

(6) of the participants own a car and (3) use public transportation. The majority of the participants use the bus as the main means of Metro transportation. The participants use the Metro bus from 3-5 times per week. The ridership is mainly used for shopping.

Metro Services

None of the participants have interacted with Metro other on a bus or train. None of the participants were aware or have used Metro Freeway Service Patrol. None of participants have attended an information meeting for a highway or transit construction project. None of the participants have been contacted regarding a transit project. No participants have interacted with any other transportation agency.

Satisfaction with Metro

All participants are satisfied with Metro service, but a safety is the main concern with ridership.

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

a. Gas – 4, b. Electricity – 4, c. Trash pick-up – 4, d. Mail service - 3



Mandarin Language Community

The Little Tokyo Service Center (LTSC) is an organization that serves the Japanese community through improving the lives of underserved individuals and families and promoting the equitable development of ethnic communities and their rich heritage. The LTSC is a multipurpose social center providing linguistically and culturally sensitive social services to the Little Tokyo community and broader Japanese American community in Southern California. The organization scheduled a total of 31 participants with extremely limited English proficiency seniors. Interpreters and translation were utilized for the Discussion Guide and Survey.

All 22 participants spoke Japanese, with 1 participant speaking Cambodian and 1 speaking Vietnamese.

Metro Usage

A total of (14) individuals own cars and a total of (13) use public transportation. A total of (12) participants use the bus on a regular basis and (10) use the train. The majority of the participants (9) use public transportation on a monthly basis, (2) ride weekly and (1) daily. The majority use both bus and rail during the week and weekend for purposes of shopping/errands, doctors' appointments.

Metro Services

Majority of participants responded, "No" to the interaction with any of Metro's Services. The group responded that the focus group session was the first engagement with Metro. (2) participants have utilized Metro Freeway Service Patrol. None of the participants have attended an information meeting for a highway or transit construction project. None of the participants have been contacted regarding a transit project. The other agencies used for public transportation, (1) Foothill Transit, (3) City of San Gabriel Transit and (3) Alhambra Transit.

Satisfaction with Metro

Primarily participants are satisfied with transportation in the area. Riders are dissatisfied with bus schedules and frequency during the evening. The worst parts of Los Angeles public transportation is homelessness on the bus lines, access for handicap riders, and bus frequency. The majority of participants stressed signage in

Mandarin. The suggested improvements for ridership include more security, scheduling, timing/frequency of bus lines and less discrimination towards riders that don't understand English.

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

- a. Gas – 1, b. Electricity – 1, c. Trash pick-up – 1, d. Mail service - 5



Russian Language Community

The Jewish Family Service LA is located in the City of West Hollywood at Plummer Park. The organization serves the people of Los Angeles with a comprehensive network of services that welcomes individuals and families of all ages and identities to a full spectrum of care. The organization works closely with individuals and their loved ones to problem-solve and guide them on their paths to safety, security, wellness and fulfillment. The services include food and hunger, domestic violence, aging, mental health, children & families, and special needs & diverse abilities.

(8) of the (10) participants spoke Russian, (1) Ukrainian, and (1) Spanish. Also, (3) individuals participated via zoom.

Metro Usage

(4) of the participants own a car and (5) use public transportation. (6) participants use the bus and (2) use the train. The participants use Metro 1-2 times per week. The ridership is mainly used for Doctors' appointments, classes at Plummer Park, trips to the library, and leisure.

Metro Services

None of the participants had interaction with Metro other on a bus or train. (2) participants have used Metro Freeway Service Patrol. None of participants have attended an information meeting for a highway or transit construction project. No participants have been contacted regarding a transit project. (2) participants use the West Hollywood agency shuttle in the City.

Satisfaction with Metro

Most participants are satisfied with Metro service in the area, the riders appreciate the synchronicity with Metro and the local agency routes. Their concerns are with bus drivers and more awareness with senior ridership and homeless riding the bus. The participants suggested Russian translation information at bus

stops in the West Hollywood area. One participant was extremely appreciative with Metro lost and found. She lost her purse on the bus and Metro brought the purse to City Hall and it was returned.

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

- a. Gas – 4, b. Electricity – 5, c. Trash pick-up – 2, d. Mail service - 3



Spanish Language Community

The Latino Restaurant Association promotes, supports and educates restauranteurs and small business owners to ensure the equitable economic growth of the Latino restaurant sector across the country. Lily Rocha the Executive Director thought it would be a good idea to conduct a focus group at a member restaurant. 11 participants that were limited English proficient in Spanish participated. The Executive Director provided translation/interpretation for the discussion guide questions and survey.

Metro Usage

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

Metro Services

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

Satisfaction with Metro

Primarily participants were not satisfied with their safety in riding the bus and train, and at bus stops. Two of the senior's felt the cost was too high for seniors to ride both bus and train, and the majority felt the extreme difficulty and very confusing in scheduling their bus/rail route and the friendliness of drivers due to language barriers. One participant mentioned it is less expensive to drive his car and easier and faster to get

to his destinations and that public transportation takes twice as long from home to work and that there are not enough buses or metro trains to get to his final destination.

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

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

a. Gas – 4, b. Electricity – 5, c. Trash pick-up – 3, d. Mail service - 5



Vietnamese Language Community

The National Asian Pacific Center on Aging (NAPCA) is a non-profit organization located in DTLA, specifically Chinatown, and for the past 40 years have been working on behalf of Asian Americans and Pacific Islanders (AAPI) older adults, promoting their dignity to family members, well-being and quality of life. They service over 50 AAPI ethnicities that speak over 100 languages. They help to voice the AAPI older adults as leaders within their families in the prevention of elder abuse. Four Vietnamese LEP individuals attended the focus group and were very limited in the English language. We added the survey results from the Mandarin focus group who had one Vietnamese attendee to bring the total to five Vietnamese LEP individual participation. Mr. C, the program manager with NAPCA provided the translation/interpretation services to the attendees.

Metro Usage

Four participants of the five own a car and they all have used the bus and rail for recreation, to go shopping/errands, to work, to school, and out to eat. One of the participants uses the Foothill Bus system since she lives in Rosemead, and one has used LA Dot. Friends usually take them places in their care, or they use their car because they believe it is unsafe to ride Metro after hours. The participant that attended the Mandarin focus group was an avid Metro bus rider with approximately 26 one-way trips per month.

Metro Services

None of the participants has ever received an invitation to attend a Metro transit project meeting or informational meeting and has never had any interaction with Metro in any way other way than to ride the bus or train and purchase their senior pass. None have used the Freeway Patrol Service and did not know it existed.

Satisfaction with Metro

All attendees were more than satisfied with the Metro bus/rail system. It was mentioned that drivers that do not speak their language are unable to explain how to get a transfer. One of the participants mentioned

she loves the free days that Metro sometimes offers. Two of them mentioned that at the Santa Anita Metro Bus station they cannot buy a tap card and services are not in their language, making it difficult for them. They do not like the fact that they have to travel to Union Station every month to take a picture for their senior tap card. The male in the audience mentioned that the bus wait is longer than the train and, on the Westside, everything is only in English and Spanish, not in the Chinese languages of Mandarin/Cantonese or the Vietnamese language. The participant that attended the Mandarin focus group mentioned the need for translation in his language and that the bus drivers are not able to understand him in his language.

They have trouble understanding information put out by Metro because it is not in their language, and they are not aware of Metro's website providing information in their language. They believe that evening/night riding would be better for seniors if the bus would arrive more frequently, so their wait is short when it starts to get dark.

Critical Public Services

Based on a scale of 1 to 5, with 1-Very dissatisfied to 5-Satisfied rating the importance of other public services:

a. Gas – 5, b. Electricity – 5, c. Trash pick-up – 5, d. Mail service - 5

3.4 Factor 3 Conclusions

It is critical for Metro to have information easy to access on their website for the LEP community or a hotline with someone that speaks their language answering questions about transfers, where to purchase a tap card, route information, etc. Many attendees of the focus groups would ride bus or rail more frequently if information was in their language and there were picture signs at the bus stops in their native language.

The majority are satisfied with Metro even though they shared concerns about safety, homeless sleeping on the bus, bus drivers being rude or ignoring them, unable to find information in their native language, bus drivers letting some get on even if they are off by a few cents and others are told to get off the bus if they are short a few cents, and the biggest fear they might end up at a location that is unknown to them and they will not know how to get home.

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

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

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

4.1 Current Information and Costs

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

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

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

Description of Categories:

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

4.2 Resources for Providing LEP Access

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

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

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

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

4.3 Cost-Effective Measures

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

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

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

Conclusion

Based on the result of Factors 1, 2, and 3, Metro has determined that it will provide LEP assistance in the following seven languages:

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

6. Language Assistance Plan and Measures

Metro's practice has been to provide the following in-language resources:

- Nearly all printed materials in bilingual English/Spanish, except for maps and select promotional pieces
- Civil Rights notices in vehicles and stations in Spanish, Chinese, Korean, Armenian, Vietnamese, Japanese, Russian,
- 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 in-language preferred communities and by request – in print and online
- In-language telephone assistance in Spanish, with other languages available through a third party live telephone interpreter service
- Transit news and information via our transportation blog that is translated in Spanish called El Pasajero.

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

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

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

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

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

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

Language Translation Threshold

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

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

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

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

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

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

<u>LEP Group</u>	<u>Percentage of Metro’s Total Stakeholders</u>
Spanish	16.61%
Chinese¹	2.13%
Korean	1.13%
Armenian	.87%
Vietnamese	.5%
Japanese	.25%
Russian	.27%

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

LEP Access Needs

Needs Related to Information Types/Channels

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

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

Other Elements Needed for LEP Access

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

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

Vital Documents

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

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

Tier 1 – Safety, Security and Civil Rights

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

Tier 2 – Information Critical to Access Metro's Services

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

Tier 3 – Information to Empower Customers

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

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

Table 10. Types of Information by Vital Document Tier

<i>Tier</i>	<i>Information Type</i>
<p>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 to 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 higher level.</p>	<ul style="list-style-type: none"> -Project Updates -Planning Information -Destination Information

Table 11. Types of Information by Vital Document Tier

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

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

Verbal/Oral LEP Assistance

Metro is cognizant that providing quality and meaningful LEP assistance to our customers goes beyond providing only written translations of our programs, information and materials. However, unlike with written translations, Metro may not be able to assess the needs or severity of the needs of our LEP customers when they make a request for verbal assistance. Therefore, Metro has mechanisms in place to provide verbal assistance to all of our LEP customers. When Metro staff encounters LEP speaking customers, they will provide verbal assistance to LEP customers either by directly assisting the customer (if staff speaks the same language as the LEP customer) or connecting the customer to our third party language interpretation service which handles up to 250 languages. Figure 6.1 shows the Language Assistance Card provided to staff and customers.

Figure 6.1

<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>For Metro information in English, please call 323.466.3876 x1.</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>SPANISH <i>Para más información sobre Metro en español, por favor llame al 323.466.3876 x2.</i></p>
<p>RUSSIAN Для получения информации о Metro на русском языке, пожалуйста, позвоните по указанному ниже номеру телефон 323.466.3876 x7.</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>ARMENIAN Մետրոյի մասին հայերեն լեզվով տեղեկություններ ստանալու համար, խնդրում ենք զանգահարել այս հեռախոսահամարով՝ 323.466.3876 x8.</p>	<p>KOREAN 메트로 Metro 정보를한국어로 알아보시려면, 아래 번호로 전화하십시오 323.466.3876 x4.</p>
<p>For all other languages, please call 323.466.3876 x11.</p> <div style="display: flex; align-items: center; justify-content: center;">  Metro  </div>	

Language Assistance Measures

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

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

Language Assistance Materials

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

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

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

B) Spanish, Korean, Chinese and Japanese:

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

C) Spanish:

All of the above, plus:

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

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

Table 12. Materials available in specific languages.

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

<i>Type of Information</i>	<i>Languages</i>	<i>Status</i>
Displays with “How to Ride” and fare information installed in select Metro Rail stations	<input type="checkbox"/> Spanish <input type="checkbox"/> Korean <input type="checkbox"/> Chinese <input type="checkbox"/> Japanese	Currently installed
Tier 1 and Tier 2 printed information as space allows, with the exception of maps and select promotional information.	<input type="checkbox"/> Spanish	Currently available

Notification of Resource Availability

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

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

Monitoring and Evaluation

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

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

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

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

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

Metro also has a Volunteer Language Review Panel (VLRP) of Metro employees who assist in reviewing LEP translations to ensure accuracy of translations as well as to provide feedback on language materials and assist on customer comment translations.

Priority of Assistance Provision

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

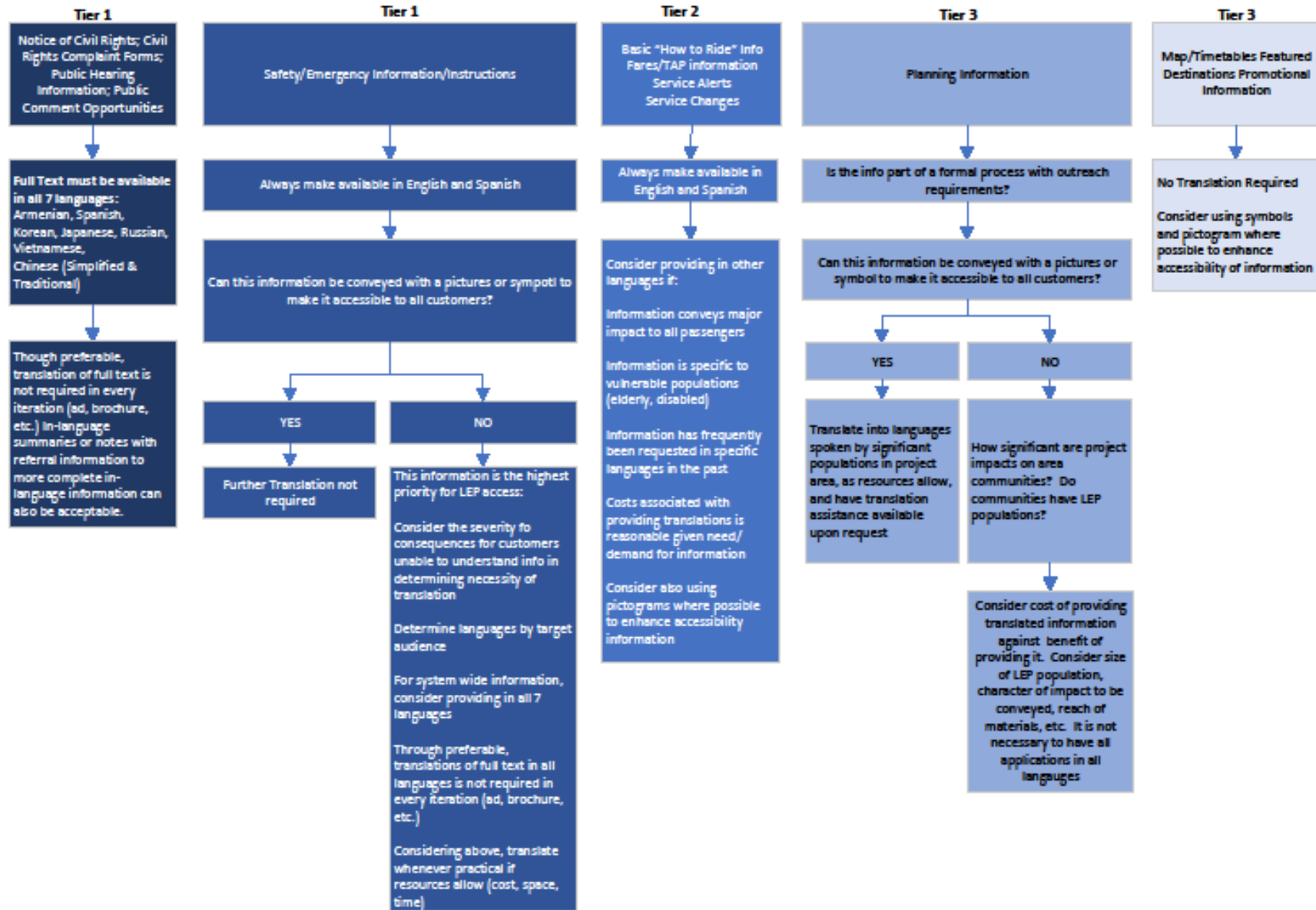
The table below outlines specific materials already in use. Updates and changes to the following list of language assistance measures will be based on available resources.

Table 13. Language Assistance Service

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

Metro's Language Assistance – Reference Guide

To determine translation requirements, first ask: "In which category does this item belong?"
Please contact Civil Rights Office for questions.



Employee Training

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

Training will include:

- Sensitivity training for new employees and those regularly interfacing with LEP customers
- Training for all employees on how to access Metro's third party telephonic language interpretation service
- Distribution of Metro's LEP Business Card and I Speak Language Assistance Poster to all staff that regularly interface with LEP customers (**Figure 6.1**)

7. Minority Representation on Planning and Advisory Bodies

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

Service Councils

- Gateway Cities
- San Fernando Valley
- San Gabriel Valley
- South Bay
- Westside/Central

Transportation Business Advisory Council (TBAC)

Community Advisory Council (CAC)

Accessibility Advisory Committee (AAC)

Metro Policy Advisory Council (PAC)

All Advisory Boards Survey Results

Latino/Hispanic	Black/African American	White/Caucasian	Asian/Pacific Islander	American Indian/Alaskan Native	No Data Available	Other	
52	20	66	24	0	1	4	N = 157
33.12%	12.74%	42.04%	15.29%	0.00%	0.64%	2.55%	Respondents
52	20	66	24	0	91	4	N = 247
21.05%	8.10%	26.72%	9.72%	0.00%	36.84%	1.62%	Advisory Members

Race and Ethnic Identification:

Description of Efforts Made to Encourage Minority Participation Service Councils

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

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



Metro Service Council Appointments Overview

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

The Service Councils are composed of transit users, local leaders, and/or elected officials that live, work or represent the region from which they are appointed; at least fifty percent of each Council members shall be regular users of public transit services. Each

Service Council is comprised of nine Members that serve a term of three years; terms are staggered so that the terms of three of each Council’s nine members expire annually on June 30. Incumbent Members can serve additional terms if re-nominated by the nominating authority and confirmed by the Metro Board; there are no term limits.

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

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

Latino/Hispanic	Black/African American	White/Caucasian	Asian/Pacific Islander	No Data Available	Other	
18	5	15	5			N = 43
41.86%	11.62%	34.88%	11.62%			Respondents
						N = 43
						Advisory Members

Race and Ethnic Identification:

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

Gateway Cities Service Council Nominating Authorities

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

the Gateway Cities region. In order to solicit applications for nominees to fill vacant Council seats for non-elected officials, the COG places advertisements in regional publications that serve the Gateway Cities region.

San Fernando Service Council Nominating Authorities

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

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

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

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

San Gabriel Valley Service Council Nominating Authorities

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

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

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

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

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

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

South Bay Service Council Nominating Authorities

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

To recruit nominees to serve on the South Bay Service Council, the SBCCOG circulates a Call for Nominations among their regions' elected officials, city managers, city clerks and working groups of the South Bay Cities COG. The SBCCOG's Steering Committee then

reviews nominations and forwards their recommendations to the SBCCOG Board, which approves the nominations and forward to Metro for approval by the Metro Board.

Westside/Central Service Council Nominating Authorities

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

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

Transportation Business Advisory Council (TBAC)

Latino/Hispanic	Black/African American	White/Caucasian	Asian/Pacific Islander	No Data Available	Other	
4	2	1	3			N = 9*
44.44%	22.22%	11.11%	33.33%			Respondents
4	2	1	3	6		N = 15
26.67%	13.33%	6.67%	20%	40%		Advisory Members

Race and Ethnic Identification:

** One individual identified and selected more than one Race/Ethnic Identification*

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

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

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

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

A typical list includes the following:

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

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

Community Advisory Council

Latino/Hispanic	Black/African American	White/Caucasian	Asian/Pacific Islander	American Indian/Alaskan Native	No Data Available	
5	4	3	2			N = 11*
45.45%	36.36%	27.27%	18.18%			Respondents
5	4	3	2		10	N = 21
24%	19%	14%	10%		48%	Advisory Members

Race and Ethnic Identification:

* Three individuals identified and selected more than one Race/Ethnic Identification

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

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

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

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

Accessibility Advisory Council

Latino/Hispanic	Black/African American	White/Caucasian	Asian/Pacific Islander	No Data Available	Other	
4		8				N = 12
33.3%		66.6%				Respondents
4		8				N = 12
33.3%		66.6%				Advisory Members

Race and Ethnic Identification:

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

Metro Policy Advisory Council (PAC)

Latino/Hispanic	Black/African American	White/Caucasian	Asian/Pacific Islander	American Indian/Alaskan Native	No Data Available	
5	2	11	2			N = 19* Respondents
26.3%	10.53%	57.89%	10.53%			
5	2	11	2		31	N = 50 Advisory Members
10%	4%	22%	4%		62%	

Race and Ethnic Identification:

* One individual identified and selected more than one Race/Ethnic Identification

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.

Assisting and Monitoring Subrecipients

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

Since January 2013, Metro has had procedures in place to train and monitor all subrecipients with regard to FTA Title VI compliance. The dates for Title VI submission are assigned on a rolling basis as Metro currently oversees approximately 70 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

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 the Grants staff to ensure that the process follows Title VI requirements and is done in a equitable way.

2022		2023	
July 26 Request for Section 5310 Working Group Members (LTSS, BOS, AAC, ADTN)	December 1 Board Actions: Approve the Solicitation for Proposals and Allocating Funds for Access Services	February 27 5310 Application Due	May 5 TAC Appeals Hearing
August 16 & 30 Section 5310 Working Group Meetings (Allocation, Evaluation and Solicitation/Application Review and Consensus)	December 5 Notice of Funding Availability: Release Solicitation and Application	February 28 - April 3 Application Review and Evaluation Period	June 22 Board Action: Approve the Funding Award Recommendations
October Subcommittee Informational Meetings (TAC/LTSS/BOS/AAC/ADTN)	December 15 Convene Potential Applicant Webinar	April 6 Application Preliminary Notification of Funding Recommendations and Debriefing	August Convene Subrecipient Orientation Webinar for Successful Applicants



FY23 Section 5310 Solicitation Schedule (Tentative)

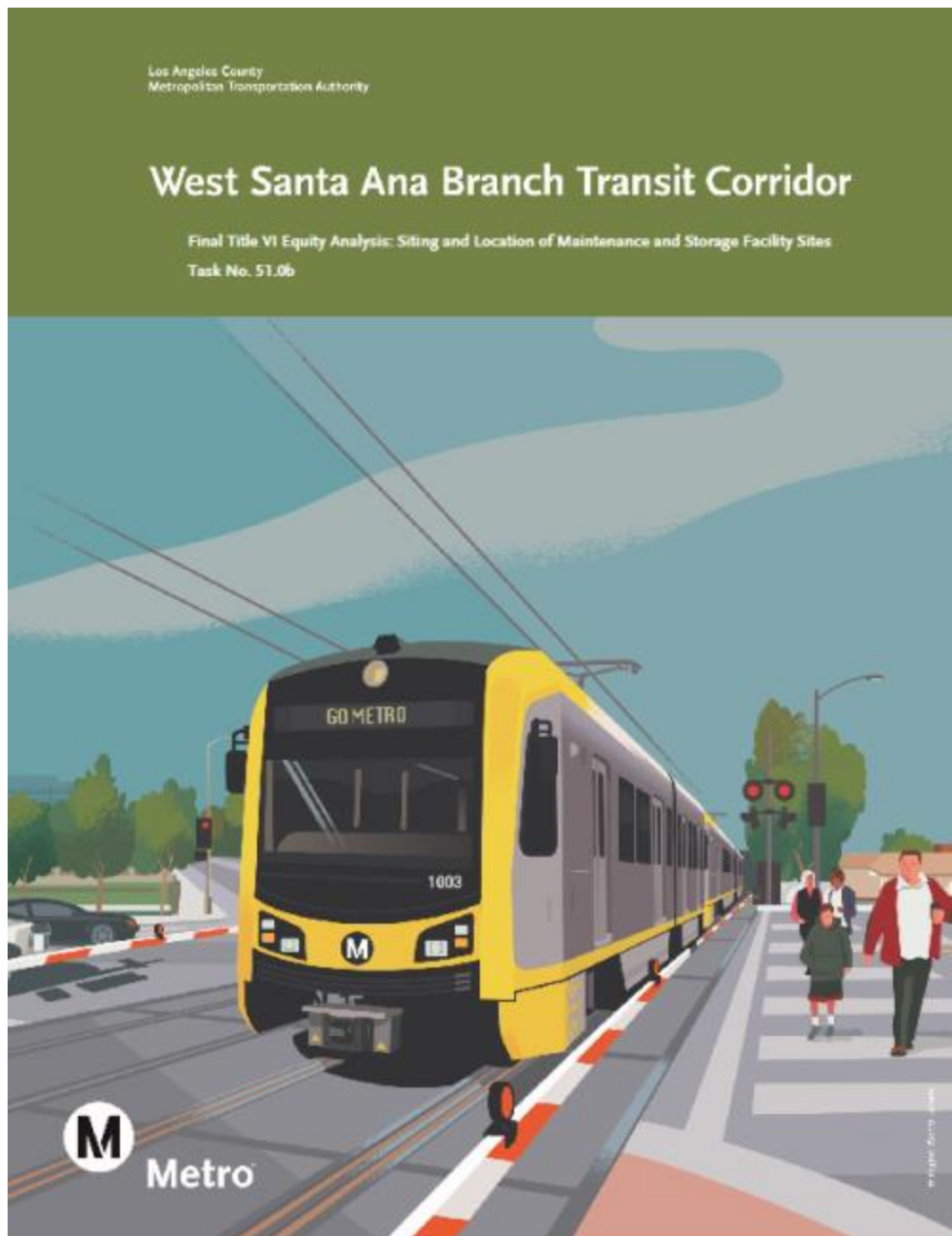
Agency	Descriptions	Status	Due Date	Submitted	Reviewed
Able ARTS Work/ Formerly Arts & Services for Disabled	Capital and Operating Assistance		11/30/2022	10/23/2019	4/15/2020
Access Services Inc.	Operating and Capital Assistance	Direct Recipient			
AltaMed Health Services Corporation	Vehicle Procurements		6/30/2022	7/21/2022	
Antelope Valley Transit Authority (AVTA)	Operating and Capital Assistance	Direct Recipient			
Bob Hope Airport Authority	Transit Center		5/16/2019	6/10/2020	10/21/2021
California State University Northridge	Capital Assistance		3/31/2020	3/9/2020	5/27/2021
Cedars-Sinai Medical Center	Passenger and Pedestrian Enhancement		3/31/2023	3/3/2021	4/28/2021
City El Segundo	Transit Center	See Notes	6/30/2024	6/10/2021	5/16/2022
City Los Angeles (City of, includes LADOT)	Passenger and Pedestrian Enhancements/Integrated Mobility Hubs	Direct Recipient			
City of Artesia	Vehicle Procurements		2/29/2022	2/23/2022	4/29/2019
City of Avalon	Capital Assistance		5/30/2023	1/12/2021	4/7/2022
City of Azusa	Parking Structure		8/30/2023	11/16/2020	1/10/2022
City of Baldwin Park	Passenger & Pedestrian Enhancements , Vehicles		8/31/2022	9/1/2019	11/14/2019
City of Bell Gardens	Vehicle Procurements		11/30/2024		
City of Bellflower	Buses and Passenger & Pedestrian Enhancements		7/31/2022	7/24/2019	11/4/2019
City of Burbank	Bus Procurement	See Notes	9/30/2022	1/29/2021	4/7/2022
City of Calabasas	Capital Assistance		9/30/2022	9/30/2019	4/28/2020
City of Cerritos	Bus Procurement		8/30/2022	5/26/2022	12/30/2019
City of Compton	Bus Procurement		9/30/2022	9/30/2019	11/18/2020
City of Downey	Vehicle and Equipment Procurements		5/31/2025	5/25/2022	
City of El Monte	Bus Procurement		12/31/2022	12/19/2019	10/30/2020
City of Glendale	Bus Procurement and CNG Facility		7/31/2021		
City of Hawaiian Gardens	Bus Shelters		3/31/2023	2/18/2021	4/28/2022
City of Inglewood	Operating and Capital Assistance		3/31/2023	2/9/2021	4/7/2022
City of La Habra Heights	Vehicle Procurements		1/31/2024	6/16/2021	6/14/2022
City of Lakewood	Bus Shelters	See Notes	EXEMPT	EXEMPT	

Agency	Descriptions	Status	Due Date	Submitted	Reviewed
City of Long Beach, Dept. of Public Works	Bus Shelters and Equipment		9/30/2022	9/26/2019	1/27/2021
City of Manhattan Beach			12/31/2022	1/24/2020	10/14/2021
City of Monrovia	Transit Center		12/31/2022	11/9/2020	4/29/2021
City of Monterey Park	Principal Management Analyst		10/31/2022	10/15/2019	10/14/2020
City of Palmdale	Transit Center		3/31/2023	3/4/2020	5/27/2021
City of Paramount*	Bus Procurement		10/31/2022	9/30/2020	10/28/2021
City of Pasadena	Bus Procurements, ITS Project		8/31/2022	8/28/2019	12/31/2019
City of San Fernando	Bus Procurement		7/31/2024	3/3/2021	4/29/2022
City of Santa Monica	Operating Assistance	Direct Recipient	11/30/2019	1/27/2020	
City of Sierra Madre	Buses and CNG Facility		10/31/2019	10/19/2021	
City of South El Monte	Bus Procurement		8/30/2022	7/18/2019	10/30/2020
City of South Gate	Bus Procurement		7/31/2022	11/4/2019	1/28/2021
City of West Hollywood	Operating and Capital Assistance		12/31/2022	2/5/2020	10/14/2021
City of Whittier	bus shelters and operating assistance		12/31/2022	11/22/2019	1/28/2021
Disabled Resource Center, Inc., (DRC)	Operating Assistance		3/31/2023	10/26/2020	10/28/2021
East Los Angeles Remarkable Citizens Association (EL ARCA)	Vehicle Procurements		5/31/2023	5/2/2021	5/11/2022
FAME	Operating Assistance		3/31/2023	9/9/2020	10/21/2021
Institute for the Redesign of Learning (IRL)	Bus Procurement	Cal Trans Recipient	5/31/2023	9/28/2020	10/28/2021
Jovenes	Operating Assistance				
LA County Dept., Workforce Developing, Aging and Community Services (WDACS)	Operating and Capital Assistance	Letter Sent	5/31/2023	3/12/2021	5/11/2022
Long Beach Transit	Capital and Operating Assistance	Direct Recipient			
Los Angeles Community College District (LACCD)	Passenger and Pedestrian Enhancements		3/31/2023	8/18/2021	
Los Angeles County Department of Public Works	Vehicle Procurements	Direct Recipient			
Los Angeles Jewish Home for the Aging	Vehicle Procurements	See Notes	8/30/2022	8/30/2019	8/18/2021

Agency	Descriptions	Status	Due Date	Submitted	Reviewed
New Horizons (SFV-Org)	Capital Assistance		7/31/2025	7/12/2022	12/31/2025
Palos Verdes Peninsula Transit Authority	Bus Procurement		8/30/2022	12/17/2019	8/18/2021
PathPoint			9/30/2022	9/10/2020	10/22/2021
PIH Health (fka Good Samaritan Hospital)	Operating and Capital Assistance		1/30/2022	2/15/2022	3/25/2019
Playa Capital Company, LLC	Bus Procurement		10/31/2022	12/5/2021	9/24/2021
Pomona Valley Community Senior Services (CSS)	Operating Assistance		5/31/2022	5/8/2019	12/31/2019
Pomona Valley Transportation Authority(PVTA)	Capital and Operating Assistance		6/30/2023	7/23/2020	10/19/2021
Rancho Research Institute (RRI) (formly Los Amigos)	Capital and Operating Assistance		5/31/2023	4/28/2020	10/19/2021
Santa Clarita Valley Committee of Aging (Senior Center)	Vehicle Procurements		11/30/2023	8/25/2020	10/21/2021
Tarzana Treatment Centers	Vehicle Procurements		5/31/2023	5/26/2020	10/19/2021
The Information and Referral Federation of Los Angeles County (211LA)	Capital Assistance		12/31/2022	2/27/2020	10/14/2021
TASC			9/30/2023	9/16/2020	4/6/2022
Therapeutic Living Centers for the Blind	Operating and Capital Assistance		12/31/2023	12/10/2020	4/6/2022
Valley Village and Affiliates	Vehicle Procurements		12/31/2022	12/17/2019	8/26/2021
Victor Treatment Centers - FKA Rosemary Children's Services	Vehicle Procurements		10/31/2022	10/29/2019	8/26/2021
Villa Esperanza Services	Vehicle Procurements		11/30/2024	12/5/2021	2/9/2019
Westside Pacific Villages	Vehicle Procurement and Operating Assistance		8/30/2022	8/18/2020	10/21/2021

9. Determination of Site or Location of Facilities

To ensure compliance with 49 CFR Section 21.9, Metro is required to conduct a Title VI equity analysis for new locations or facilities in order to ensure that locations are selected without regard to race, color, or national origin. Since the last program submission, Metro has approved construction of a transit facility. The Title VI Equity Analysis for the Siting and Location of Maintenance and Storage Facility for the West Santa Ana Branch Projects is included in **Appendix C**



CHAPTER IV

REQUIREMENTS FOR FIXED ROUTE PROVIDERS

10. 2022 Systemwide Service Standards

SYSTEMWIDE OPERATING STANDARDS

Passenger Loading

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

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

Table A-1
Passenger Loading Standards

Headways

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

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

Table A-2
Headway Standards

On-Time Performance

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

Stop Spacing

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

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

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

Accessibility

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

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

Figure A-1
Accessibility Standard

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

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

Figure A-2
Passenger Amenities Policy

Vehicle Assignment Policy

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

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

Figure A-3
Vehicle Assignment Policy

11. Monitoring of Transit Service Results

Review of Service Policies and Standards FY2020 – FY2022

This is a review of Metro's compliance with specified service standards and policies under the requirements of FTA Circular 4702.1B, Chapter IV-9, Section 6. The review covers the period of FY2020 through FY2022.

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 population (disparate impact) or low-income household in poverty (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 2,022 tracts within Metro's service area that meet the above thresholds of 3 HH/acre and/or 4 jobs/acre. Only 14 of these tracts are not within one-quarter mile of fixed route service. This is a service availability of 99.3% which meets the standard.

Service Area Demographics – Minority Population

	Service Area	Tracts Not Served
Population	8,185,999	56,157
Minority Population	6,086,572	32,674
Minority Share	74.4%	58.2%

Service Area Demographics – Low Income Households

	Service Area	Tracts Not Served
Households	2,737,823	18,643
Low Income Households	1,055,231	5,663
Low Income Share	38.5%	30.4%

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

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

There are 112 fixed route bus lines operated by Metro. It was determined that 96 of these are Minority lines (85.7%), and 97 of these are Low-income lines (86.7%). 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 FY19. The adopted headway standards follow:

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

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

Bus Headway Standards

Service Type	Peak Max. (in min)	Off-Peak Max (in min)
Local	60	60
Limited	30	60
Express	60	60
Shuttle	60	60
Rapid	20	30
BRT	12	30

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

Compliance determination used service in effect as of December 19, 2021, which represents full implementation of the NextGen Service Plan in terms of scheduled service. Service Plans implemented on February 20 and June 26, 2022, were not used since they utilized temporarily reduced schedules due to bus operator shortage. All bus and rail lines were in full compliance with the adopted standards for weekdays, Saturdays, Sundays, and Holidays.

Weekday Headway Compliance - 112 of Bus Lines

	All Lines	Minority Lines Only	Low Income Lines Only	All Compliance	Minority Compliance	Low Income Compliance
Meets Standard	112	96	97	100%	100%	100%
Exceeds Standard	0	0	0			

Saturday Headway Compliance - 107 of Bus Lines

	All Lines	Minority Lines Only	Low Income Lines Only	All Compliance	Minority Compliance	Low Income Compliance
Meets Standard	107	91	93	100%	100%	100%
Exceeds Standard	0	0	0			

Sunday & Holiday Compliance -107 of Bus Lines

	All Lines	Minority Lines Only	Poverty Low Income Only	All Compliance	Minority Compliance	Low Income Compliance
Meets Standard	107	91	93	100%	100%	100%

Exceeds Standard	0	0	0			
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4. Loading Standards

Current service standards were adopted in FY19. The adopted passenger loading standards follow:

Rail Passenger Loading Standards

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

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

Bus Passenger Loading Standards

Service Type	Peak Psgrs/Seat	Off-Peak Psgrs/Seat
BRT	1.30	1.30
Rapid	1.30	1.30
Express	1.30	1.30
Limited	1.30	1.30
Local	1.30	1.30

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

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

Heavy rail is based on trip samples collected by scheduled checkers. Checkers ride randomly selected cars on randomly selected trips recording data for Ons and Offs by station. Over a six-month sliding time frame this data is aggregated to build a profile of rail ridership and is the primary source for ridership estimation by day type and line. While only one car is monitored on any given sample trip, whether that car meets the loading standard is a surrogate for whether trains are meeting the standard. Light rail loading based on using Automated Passenger Counters (APC).

Loading on the bus system is monitored every six months using quarterly APC data for max loads at time points. Since the most recent bus load standard evaluation was performed using January through March 2022 data, the samples collected from rail ride checks were compiled for the same three months.

Each rail ride check record was processed using Line # (determines mode and applicable # of seats), day type, trip start time (used to categorize weekday trips as peak or off peak), and max accumulated load (calculated from the observations in each check).

Since the light rail system is now equipped with APCs on its rail cars, the loading standards is based on APC data.

A rail mode is assumed to comply with the loading standards if 95% of all monitored trips conform to the standards. Data is from the period January through March 2022 which is the same time frame used for bus monitoring.

Weekday Rail Load Standard Monitoring

	Weekdays		
	# Of Checks/Trips	Within Standard	% Compliance
Heavy Rail	1,071	1,071	100%
Light Rail	68,559	68,545	100%

Weekend Rail Load Standard Monitoring

	Saturday			Sundays & Holidays		
	# Of Checks/Trips	Within Standard	% Compliance	# Of Checks/Trips	Within Standard	% Compliance
Heavy Rail	931	931	100%	931	931	100%
Light Rail	10,329	10,328	100%	12,234	12,230	100%

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

Bus monitoring is more extensive as all buses are equipped with APC's, and data is available for all time points along each bus route for observed max loads by trip. Every six months the most recent quarterly data is evaluated to determine adherence with the adopted standards. The most recent evaluation used January through March 2022 data.

Bus Load Standard Monitoring

Day Type	# Trips	Within Standard	% Compliance
Weekdays	580,775	568,490	97.9%
Saturdays	81,650	80,934	99.1%
Sundays/Holidays	86,429	85,823	99.3%

In reviewing the data, Lines 45, 51, 108, and 603 failed to meet the standard on weekdays while Line 16 did not meet the standard throughout the week. Other than these exceptions, the rest of the bus system was in conformance with the adopted loading standards.

5. On-Time Performance Standards

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

Rail is currently monitored using Hastus. Since bus is evaluated every six months using quarterly data this evaluation was performed on the same basis. Data for the months of January through March 2022 was compiled.

Weekday Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	25,340	25,213	99.5%
Light Rail	69,308	68,564	98.3%

Saturday Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	4,188	4,171	99.6%
Light Rail	9,060	9,009	99.4%

Sundays & Holidays Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	4,592	4,559	99.3%
Light Rail	10,192	10,138	99.5%

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

However, the bus on-time performance is consistently short of the 80% objective. The following observations are based upon three months of data from January through March 2022.

Bus Weekday On-Time Performance

	All Lines	Minority Lines	Low Income Lines
Avg On-Time %	69.0%	69.7%	69.1%
Lines Meeting Std	8	7	6
Lines Failing Std	104	89	91
% Meeting Std	7.1%	7.3%	6.1%

Bus Saturday On-Time Performance

	All Lines	Minority Lines	Low Income Lines
Avg On-Time %	68.4%	68.4%	68.1%
Lines Meeting Std	11	10	10
Lines Failing Std	96	81	83
% Meeting Std	10.3%	11.0%	10.8%

Bus Sunday & Holiday On-Time Performance

	All Lines	Minority Lines	Low Income Lines
Avg On-Time %	74.5%	74.6%	74.4%
Lines Meeting Std	21	19	19
Lines Failing Std	86	72	74
% Meeting Std	19.6%	20.9%	20.4%

On any given day type non-Minority, non-Poverty, Minority, and Poverty bus lines exhibit similar on-time percentages. Unfortunately, only handful of bus lines achieve the 80% on-time standard with 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. But since most of the system are both minority and low-income lines, the percentages that achieve the standard are all within one percent of each other for weekdays, Saturdays, and Sunday/Holidays. Consequently, there are no observations of disparate impacts on minorities and disproportionate burdens on low-incomes lines since everything is less than the five percent threshold.

Please note, a significant reason for the low rates of on-time performance has to do with the route running time 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, the running time used for scheduling was no longer adequate and was addressed in the June 26, 2022, Service Change. With this change along with the implementing more projects to speed up bus service as part the NextGen Bus program, on-time performance for bus services should improve significantly systemwide.

6. Stop Spacing Standards

Stop spacing standards were incorporated with the FY19 Metro Service Policy update. It states the average stop/station spacing by service type in miles where the average spacing should fall within 0.1 miles of the specified average at least 90% of the time.

Average Stop/Station Spacing Standards

Service Type	Average Stop Spacing
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Heavy Rail	1.50
Light Rail	1.50
BRT	1.25
Rapid	0.75
Express	1.25
Local	0.30

Transit Line Average Stop/Station Spacing

Service Type	No. of Lines Meeting the Standard	No. of Lines Not Meeting the Standard	Service Type Average
Heavy Rail	2		0.8 miles
Light Rail	4		1.1 miles
BRT	2		1.1 miles
Rapid	3		0.6 miles
Express	4	1	1.5 miles
Local	102		0.2 miles

As shown above, only one transit line does not meet the standard – Express Line 577 which has an average stop spacing of 4.8 miles. Even though it exceeds the standard, the spacing is appropriate due to the travel market for the corridor. Since this is only one line out of 116 transit lines, Metro’s Transit System meets the standard overall.

7. Passenger Amenities Standards

With the FY19 update of Metro’s Service Policies a set of passenger amenities standards were incorporated. Those standards are presented here.

Heavy Rail Passenger Amenities Standards

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

Applies to each station

Light Rail Passenger Amenities Standards

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

Applies to each station

Bus Passenger Amenities Standards

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

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

There are no standards for bus stops because apart from painting the curb Red and erecting bus stop signage Metro has no jurisdiction over street 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 comply, and none have opened 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, no more than two vehicle types at each facility.

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

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

Heavy Rail – Vehicle Age by Facility

Facility	Model	# Active	Average Age (years)
Div. 20 – Los Angeles	Breda A650 Base	26	29.3
	Breda A650 Option	74	23.6
		100	25.1

Light Rail – Vehicle Age by Facility

Facility	Model	# Active	Average Age (years)
Div. 11 – Long Beach	Siemens 2000 GE/ATP	23	19.4
	Kinkisharyo P3010	57	4.4
		80	8.7

Div. 14 – Santa Monica	AnseldoBreda2550Base	2	13.3
	Kinkisharyo P3010	56	5.6
		58	5.9
Div. 21 – Los Angeles	AnseldoBreda2550Base	14	12.4
	Kinkisharyo P3010	10	4.6
		24	9.1
Div. 22 - Lawndale	Siemens 2000 Base	29	20.9
	Kinkisharyo P3010	25	3.3
		54	12.8
Div. 24 - Monrovia	AnseldoBreda2550Base	34	12.6
	Kinkisharyo P3010	39	4.1
		73	8.1

Note: As of June 26, 2022

A couple of constraints apply to the light rail assignments. The Siemens 2000 Base vehicles may only operate from Div. 22 (C Line) because their controller package is not compatible with other lines. This will no longer be an issue once they undergo their mid-life overhaul/modernization program which is expected to be completed toward the beginning of FY24. The Anseldo Breda 2550 Base vehicles may not be operated from Div. 22 as they are too heavy for the C Line. This sub-fleet is also beginning their mid-life overhaul/modernization program.

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 FY23. 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		164	8	24	196	4.5
2		181			181	6.9
3		139	30			5.0
5		120		45	165	9.5
7		112	77	25	214	8.3
8		127	33	40	200	4.9
9		172	52		224	6.1
13		53	60	69	182	7.9
15		144	42	43	229	5.6
18		121	102	24	247	6.5

Note: As of June 26, 2022

Bus – Vehicle Age by Facility – Purchased

Division	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
95	11	22	4		37	9.7

97		70			70	3.3
98	18	23	8		49	9.9

Note: As of June 26, 2022

Bus – Vehicle Age Summary

	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
	29	1448	416	269	2,162	6.5

Note: As of June 26, 2022

The average fleet age by Division ranges from 3.3 years for contract Division 97 to 9.5 years for directly operated Division 5. All these average ages are within 3 years for the system average. The useful life for a bus, ranges from 12 – 15 years. So, the average age of each division fleet is well within this range. In the last review, Division 97 had the oldest average fleet. Consequently, it now has the youngest feet 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 and then during the next decade, the entire bust fleet will be converted over to battery electric buses.

Conclusion

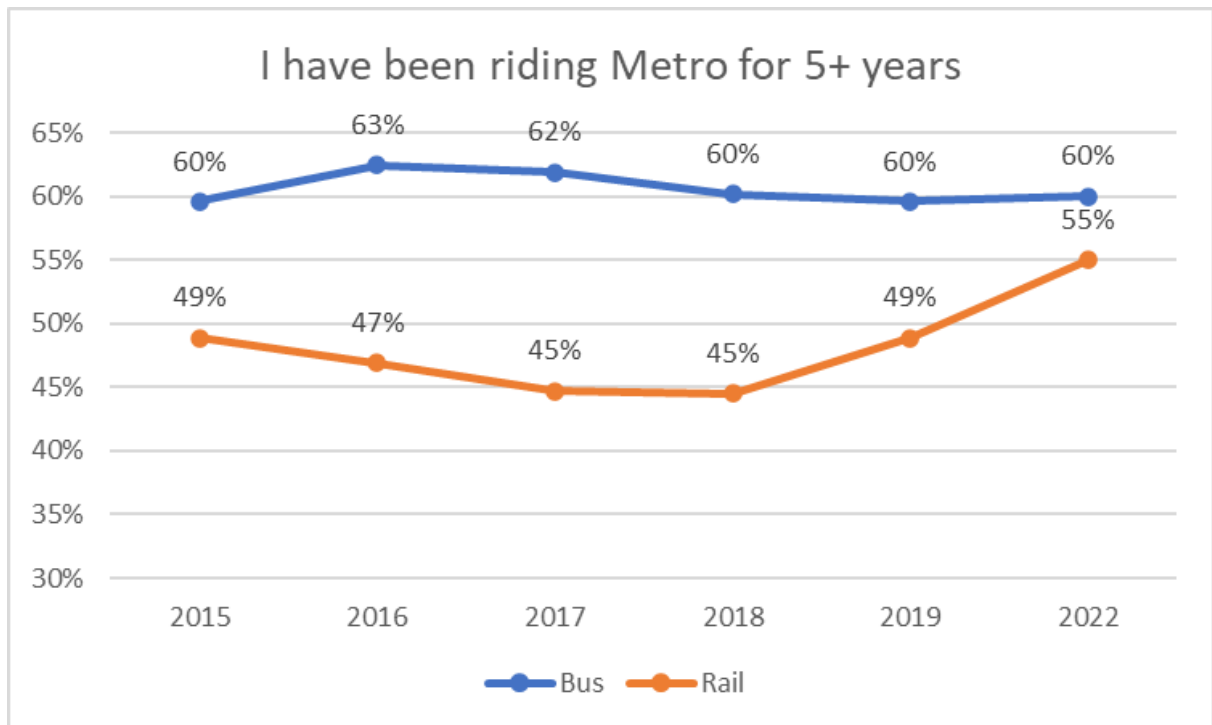
In conclusion, the results of the service monitoring indicate that the adopted systemwide standards are set properly. However, Metro needs to significantly improve the systemwide bus service on time performance. Much of this should be remedied with the running time adjustments made for the June 26, 2022 service change and future NextGen capital improvement projects designed to speed up service.

12. Collection and Reporting of Demographic Data

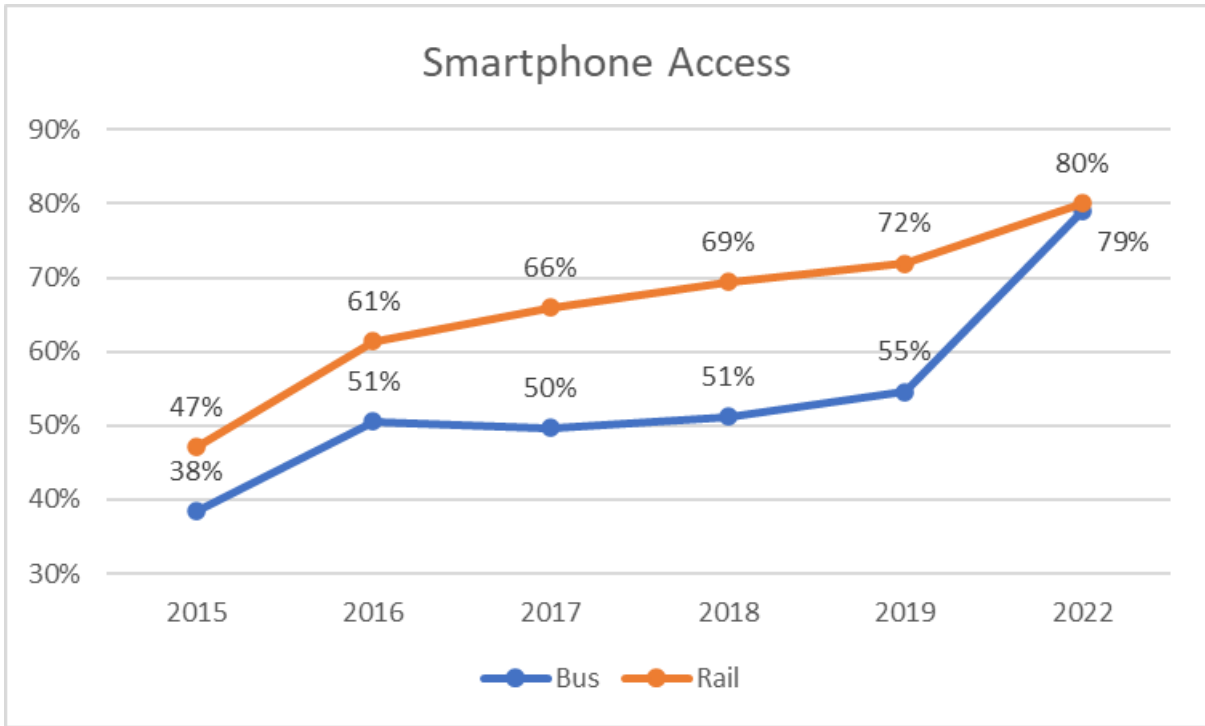
Countywide Planning Metro Research has been fielding an on-board customer satisfaction survey of Metro bus and rail lines at least once a year since 2003. This survey allows Metro to track changes in rider satisfaction levels, access to and knowledge of Metro resources, perceptions of safety and cleanliness,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

Since the COVID-19 Pandemic, Metro has not been able to field the survey. The CX Survey, which is similar in methodology was fielded in spring 2022. We hope to re-instate the Planning survey in Spring of 2023. The CX Survey is available in 9 languages, has a response rate over 60 percent, covers 97 percent of Metro’s ridership, and has an estimated error rate of under 2 percent. In addition, the CX Survey covers weekend service and late night service, which the Planning survey does not cover. Comparing our results year over year allows us to further check the accuracy of the numbers and see trends within survey results. Some of these trends are listed in the following section. However, due to the differences in fielding coverage, the 2022 results should be cautiously compared with the earlier surveys.

Over the years Metro has also asked riders how long they have been riding the system. This allows us to track how well we are retaining long term users, and how changes or new lines affect our riders. As you can see in the chart below, from 2016 to 2018, the percentage of rail riders who have been riding for 5 or more years dipped. This coincides with the extension of the Expo and Gold Lines, which brought in new riders to the system. In 2022, it has risen to its highest in the last 10 years at 55%. Meanwhile, bus tenure continues to be steady after dropping slightly in 2016.



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



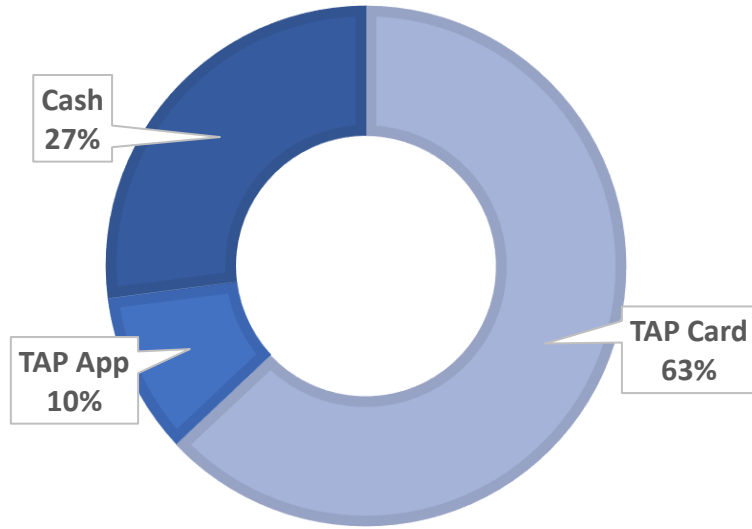
As we forecasted in 2019, our smartphone access on transit has continued to climb in since 2019. It is now at 80% for rail and 79% for bus..

Since 2019, Metro introduced a TAP app for fare management. In 2022, about 3 in 4 passengers use a TAP Card or the TAP App to pay for their fares.

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

2022 FARE PAYMENT

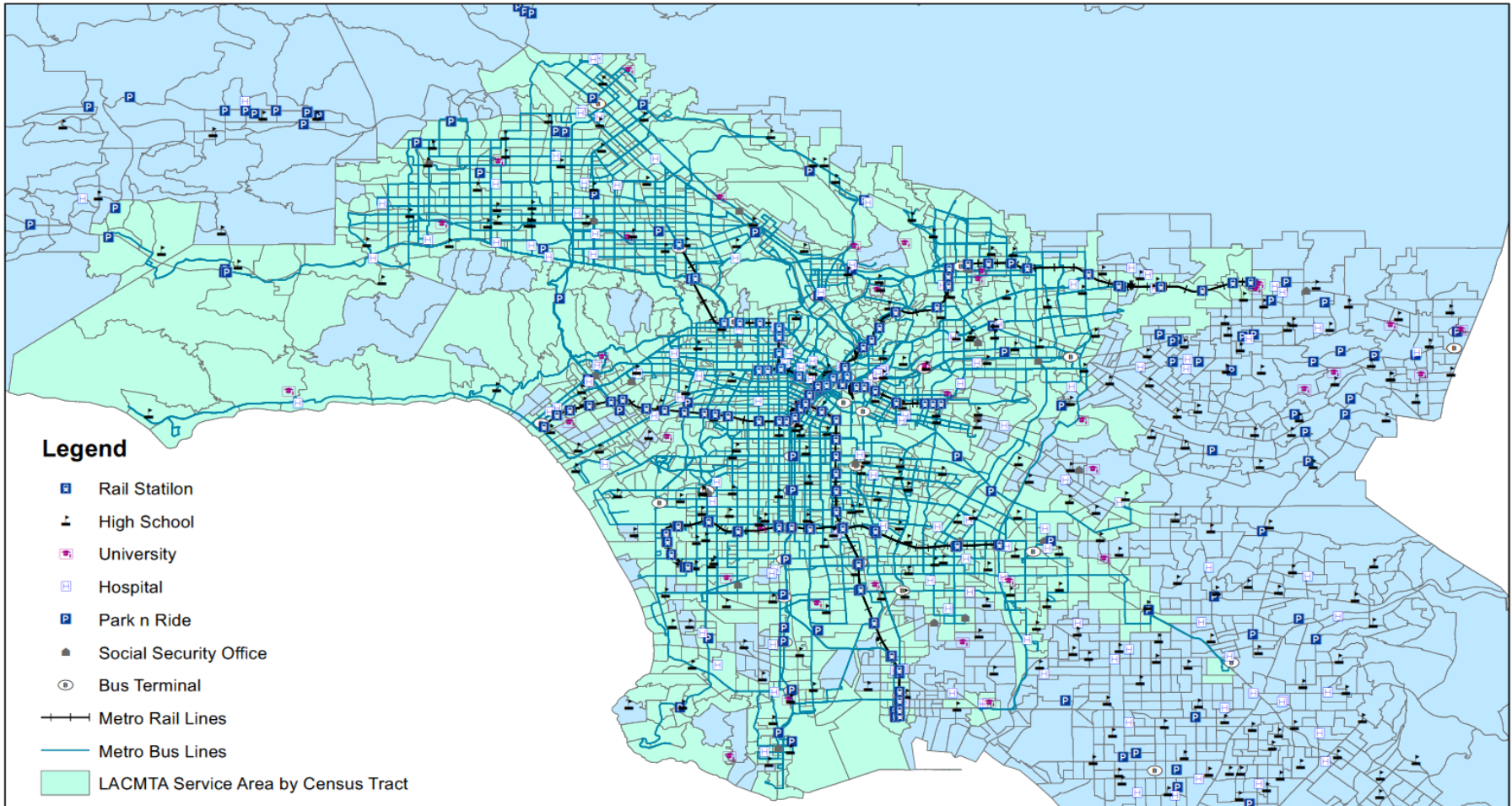
BY PERCENTAGE OF BUS/RAIL PASSENGERS



	Minority	Low-Income
Ridership	Bus 91% Rail 82%	Bus 85% Rail 67%
Population	74%	44%



Title VI Monitoring: LACMTA Transit Service Per June December 2021 Service Change

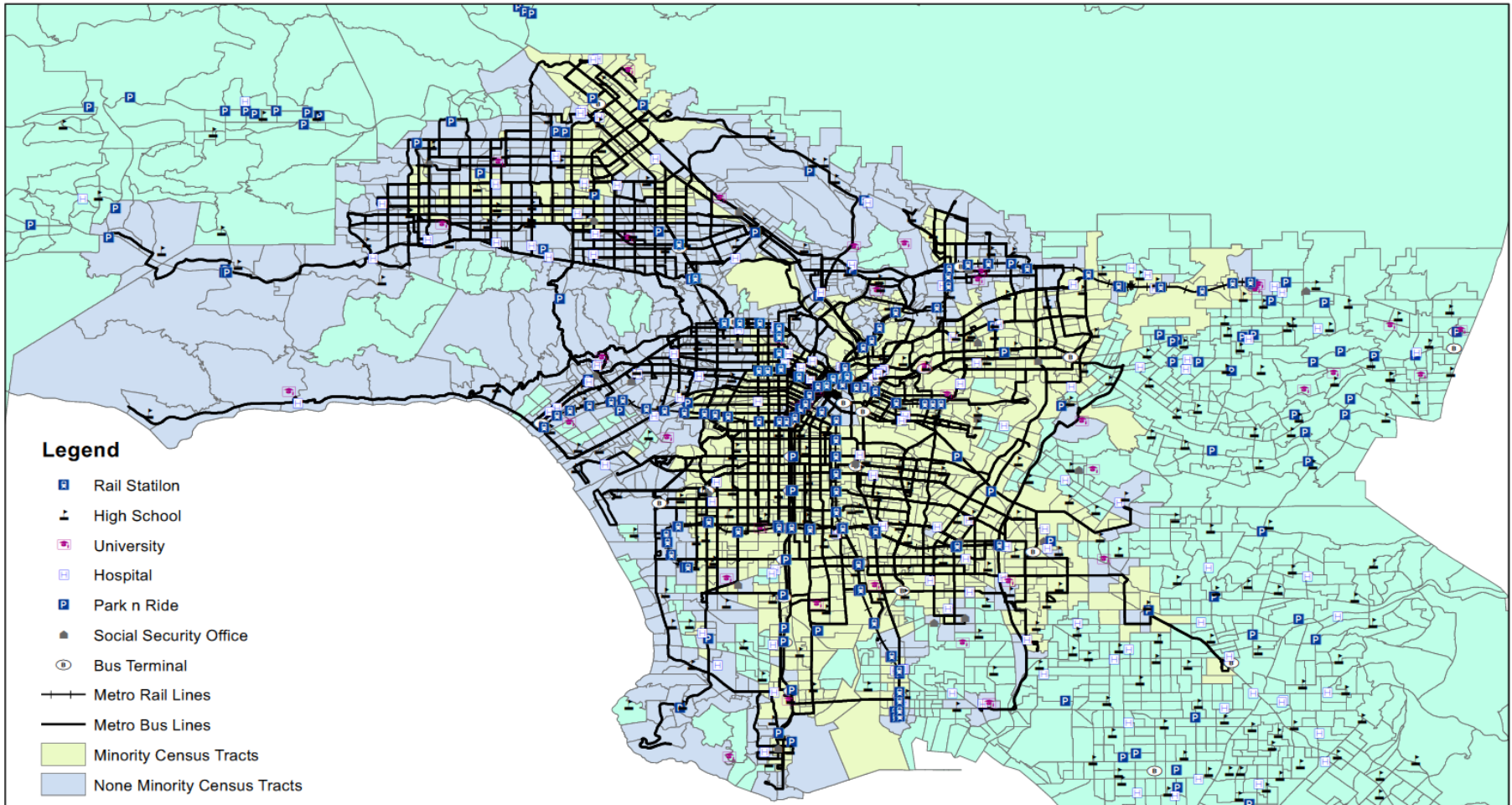


Prepared by Metro Service Planning and Scheduling

July, 2022



Title VI Monitoring: LACMTA Transit Service with Minority Census Tracts Per December 2021 Service Change

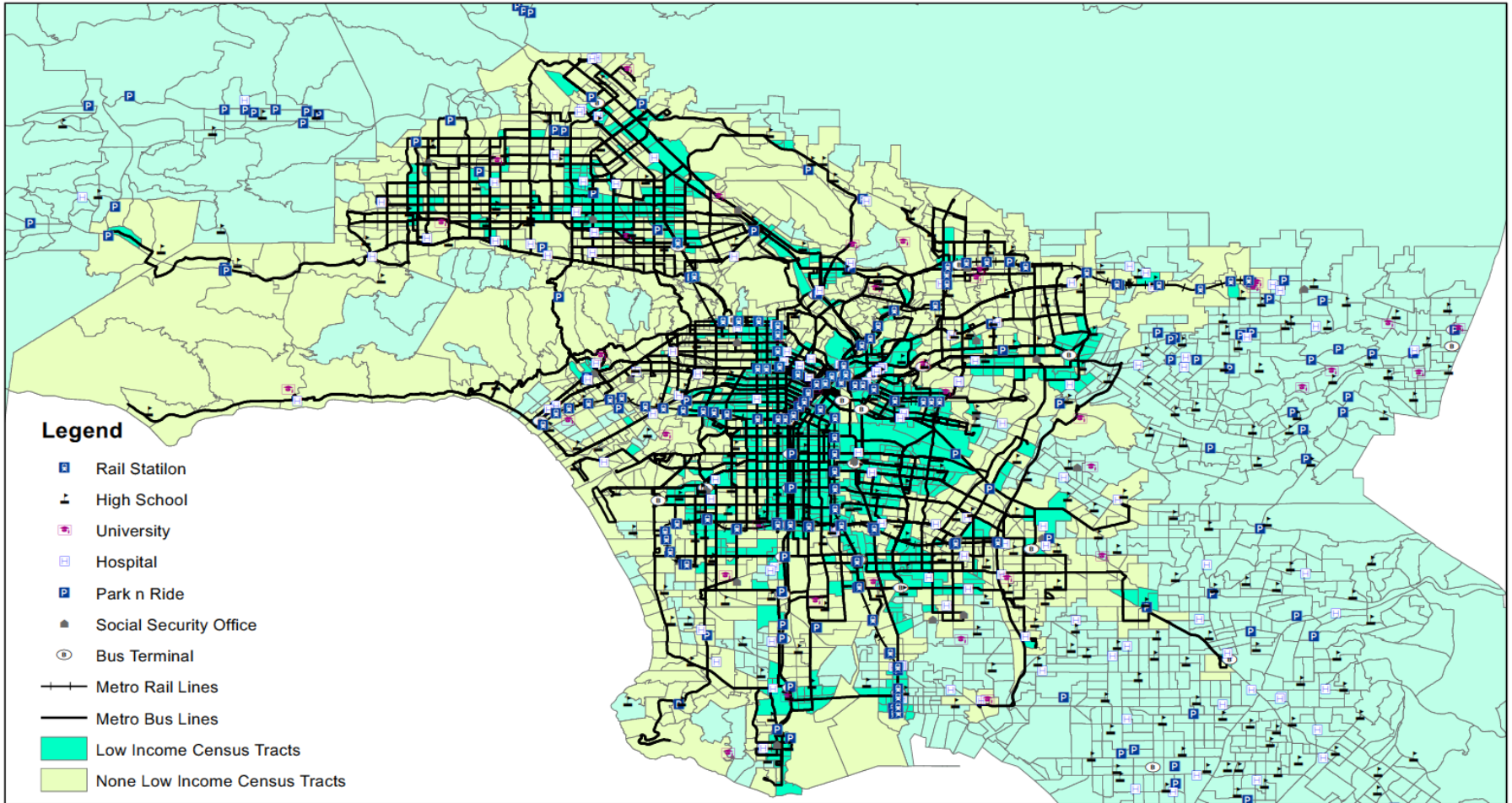


Prepared by Metro Service Planning and Scheduling

July, 2022



Title VI Monitoring: LACMTA Transit Service with Low Income Census Tracts Per December 221 Service Change

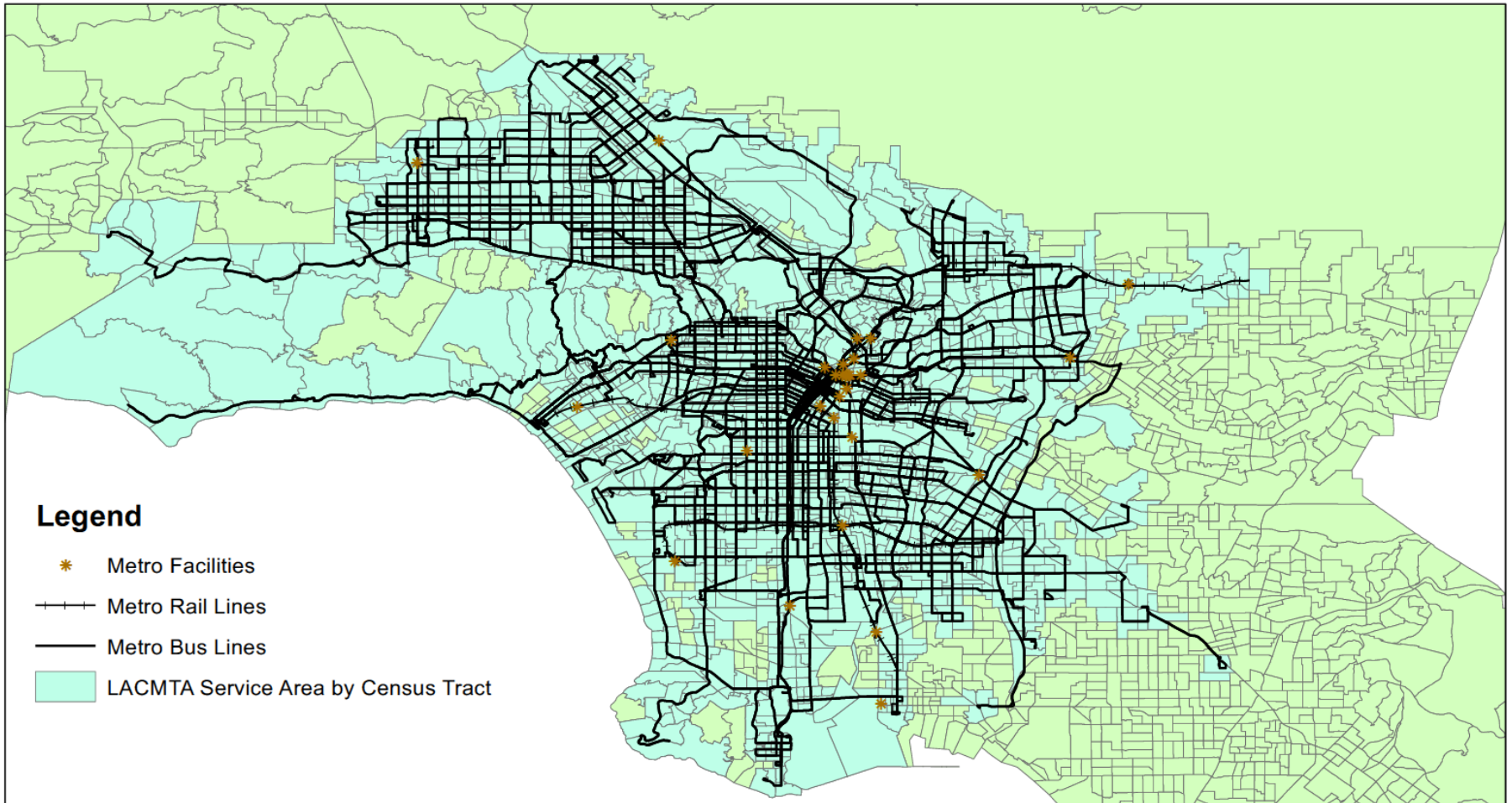


Prepared by Metro Service Planning and Scheduling

July, 2022



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

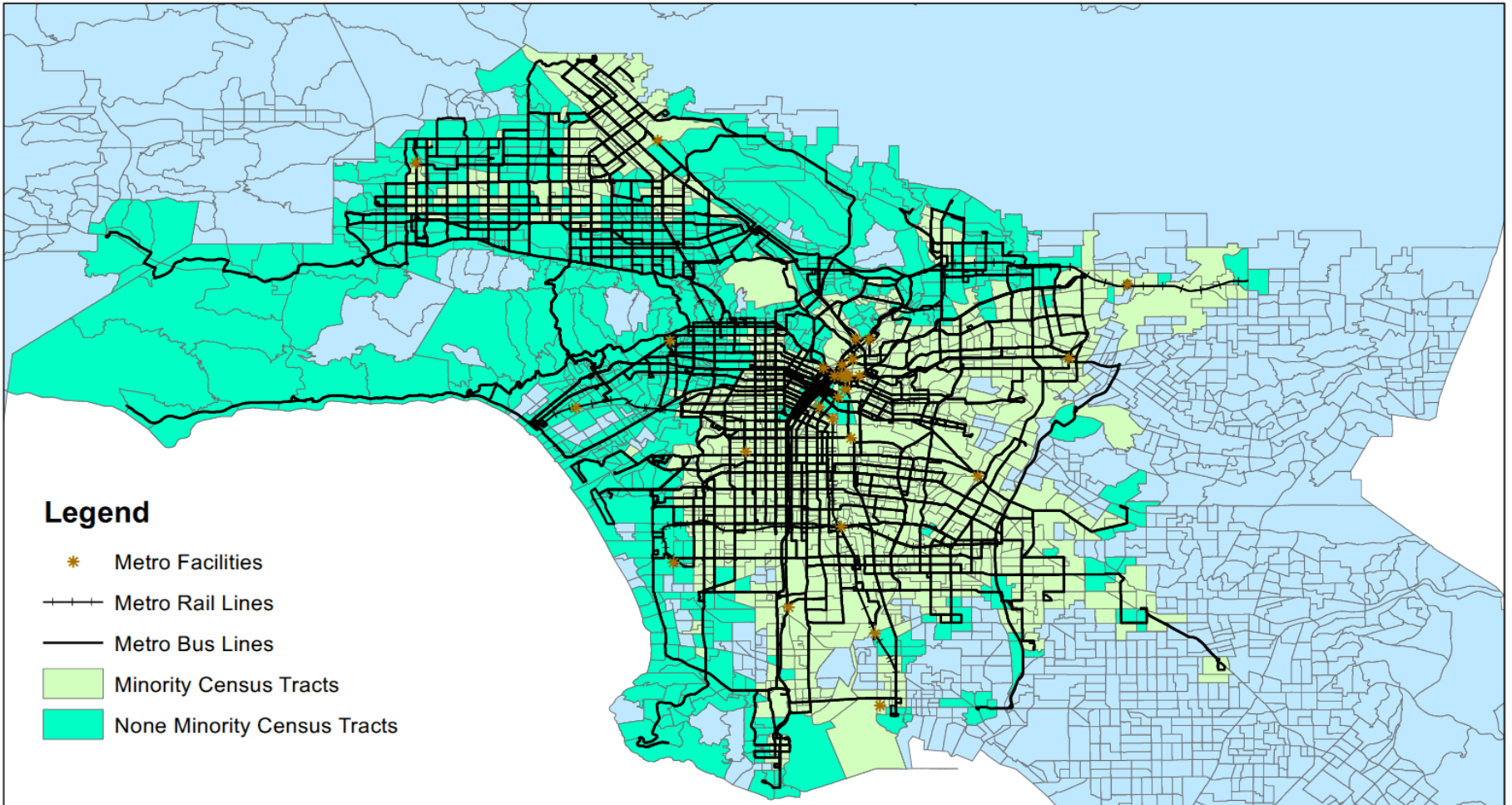


Prepared by Metro Service Planning and Scheduling

July, 2022



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

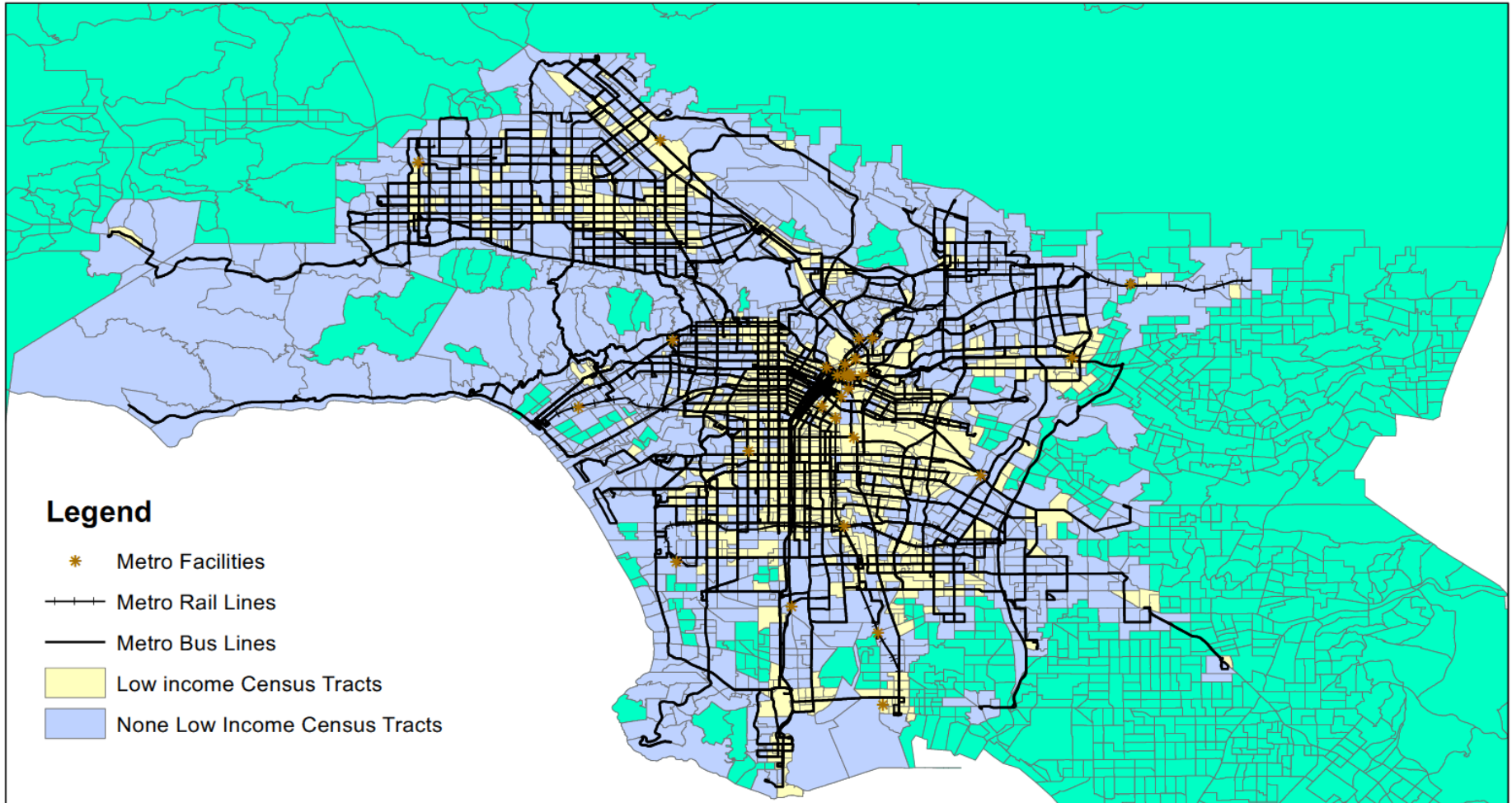


Prepared by Metro Service Planning and Scheduling

July, 2022



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



Prepared by Metro Service Planning and Scheduling

July, 2022

13. Equity Analyses of Service and Fare Changes

Since October 2019, Metro conducted the following Service and Fare Equity Analyses:

Service Equity Analyses

Metro went through a comprehensive review of all the routes in the system and the result was a complete overhaul of the system which became known as the “Next Gen Bus Plan”. Metro conducted a SAFE to analyze the Service Changes for Next Gen and submitted to FTA for technical assistance. FTA provided positive feedback and advisory comments which were included in the final SAFE presented to the Board and approved on October 22, 2020. The SAFE results are included in this section along with documentation of Board approval.

Fare Equity Analyses

Since October 2019, Metro has not adopted any permanent fare changes and has thus not completed any Fare Equity Analyses. However, there are multiple reduced fare pilot programs that are currently ongoing. The purpose of this section is to include relevant information on the timeline for promotional pricing and the agency’s plan for conducting and reporting on the future required Fare Equity Analyses.

Due to the pandemic, non-enforcement of fares and rear door boarding on buses began in March 2020, for the safety of both transit operators and transit riders. As required by an approved Metro Board motion, full-price day passes, 7-day passes, and 30-day passes were reduced to a promotional 50% off price when Metro resumed normal boarding and fare collection practices in January 2022. The intent of the motion, which was adopted by the Board in the early days of the pandemic in May 2020, was to provide economic relief for struggling families as LA County entered the recovery phase of the pandemic.

A separate Board Motion adopted in September 2021 mandates that Metro offer free 90-day transit passes for new applicants to Low Income Fare is Easy (LIFE), Metro’s regional low income fare discount program. Similar to the 50% off promotional fares, this policy was adopted in order to provide additional relief to low income transit riders during the pandemic recovery period.

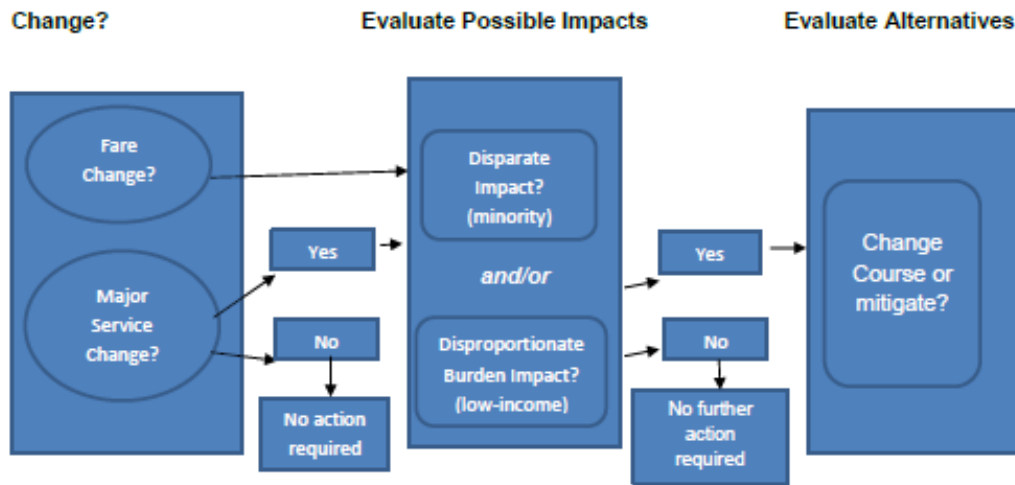
In June 2022, Metro received confirmation from FTA to extend the maximum pilot period for these promotional, pandemic-relief fare programs up to 18 months per the extension approval letter received in May 2020. Before the end of the extension, staff will bring recommendations for permanent fare pricing adjustments to the Board of Directors for approval, including results of the required Fare Equity Analyses. Those reports will be included in Metro’s 2025 Title VI Program Update.

Service and Fare Equity Analysis Policies

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 2022 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.

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 2022 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 policies to assist in the evaluation of impacts to minority and low-income riders when considering service and fare changes. Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, which Metro defines as \$59,550 for a four-member household in Los Angeles County. The line and system level evaluations are identical to those used to determine potential disparate impacts but compare low-income and non-low-income populations rather than minority and non-minority.

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 2022 FTA Title VI Program Update:

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable.

- a. For major service changes, a disproportionate burden will be deemed to exist if an absolute difference between percentage of low-income adversely affected by the service change and the overall percentage of low-income persons is at least five percent (5%).**
- b. For fare changes, a disproportionate burden will be deemed to exist if an absolute difference between the percentage of low-income adversely affected and the overall percentage of low-income is at least five percent (5%).**

Title VI Service Equity Analysis

NextGen Bus Plan (Bus Network Design)

Fall 2020

Los Angeles County Metropolitan Transportation Authority

Recipient ID: 5566

Contact name – email:

Operations Service Planning

Aida B. Berry – email: berrya@metro.net

Office of Civil Rights & Inclusion

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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.

1.1 Analysis Purpose

This report provides an equity evaluation of a proposed systemwide restructuring of Metro bus service termed NextGen. Conducted over the past two years with extensive public involvement the proposed program of changes is intended to increase the frequency of service to most riders and speed up the operation of the system. While reducing the number of bus stops will increase speeds on some services, the primary speed benefit will ultimately be achieved through a program of capital improvements designed to enhance the priority of bus service on major corridors. These will be introduced in later years of the phased implementation of the service changes.

The program is intended to begin implementation in December 2020, and will be phased in as a consequence of the impacts of the COVID-19 pandemic occurring in the spring of 2020. Ridership is expected to take some time to return to the levels of early 2020 so the restructuring program is expected to be implemented with reduced service frequencies which will be increased as ridership recovers.

2. Applicable Policy and Definitions

2.1 Metro's Title VI Major Service Change Policy

Metro's Board of Directors adopted a revised Title VI policy for major service changes in September 2019. The policy requires that "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.." ¹

For the 2019 FTA Title VI Program Update Major Service Change is defined as any service change meeting at least one of the following criteria:

¹ Los Angeles County Metropolitan Transportation Authority Mice Change Policy

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.

Policy definitions 1 through 4 were applicable to service changes in the NextGen program.

2.2 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 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%) 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 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. For major service 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 Title VI Program which was updated and approved by Metro's Board in October 2019.

3. METHODOLOGICAL 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.² 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.

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. County data was compiled using 2017 American Community Survey (ACS) ethnicity and income demographic data.

A Service Equity Evaluation is presented herein in accordance with the requirements of Federal Transit Administration Circular 4702.1B. The evaluation assesses whether there are adverse disparate impacts on minority passengers and/or disproportionate burdens on low income riders arising from the proposed service restructuring.

Only major service change proposals as defined in Metro's Transit Service Policy are required to be evaluated for adverse impacts. Three separate analyses have been conducted: (1) a line by line analysis to identify adverse impacts caused by changes to individual bus lines or groups of related lines serving a specific corridor; (2) a review by Day Type and Service Type to determine if adverse impacts result from changes to each type of service; and (3) a review by Service Council area to determine if there are geographical adverse impacts.

For the purpose of these analyses the following demographics were used as the service area minority and low income population shares (Table 3-1). The 2017 American Consumer Survey (ACS) provided the population, minority population, and low income household counts by tract. This was the most recent available

² Los Angeles County Metropolitan Transportation Authority, Title VI Program Update, October 2019

data at the time that the NetPlan tool demographic data was populated. Total households were also incorporated and the low income shares of total households were assumed to represent the low income population shares.

Table 3-1 Metro Service Area Demographic Breakdown

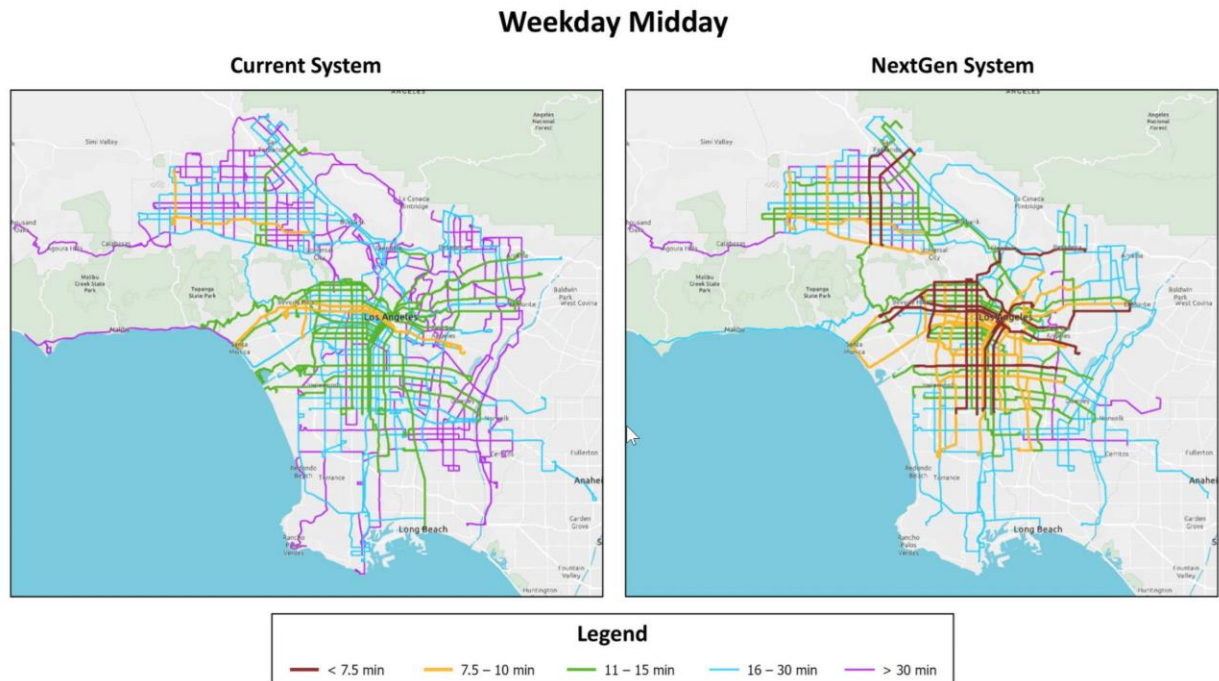
Total Population	Minority Population	Percent Minority	Low-Income Population	Percent Low-Income
10,105,722	7,428,740	73.5%	1,688,505	16.9%

Data is compiled from all tracts within one quarter mile of stops on each bus route. Service increases are considered beneficial and no adverse impact results. Service decreases, including route cancelations, are considered adverse, and if the minority share of impacted population is greater than 78.5% then a Disparate Impact is identified. For adversely impacted populations if the low income share exceeds 21.9% then a Disproportionate Burden is identified.

3.1 Existing and Proposed Service

Figure 3-1 depicts the existing fixed route bus system operated by Metro and the proposed NextGen fixed route system. Routes are color coded to indicate weekday midday service frequencies.

Figure 3-1 Before and After Fixed Route Services Maps



3.2 Methodological Tool

This analysis uses a tool (NetPlan) built into the HASTUS scheduling system. The Reference, or Baseline, descriptions of existing service by variant are

defined. A variant is a defined directional route or route segment operated by one or more trips on a bus line and includes bus stop locations served by the variant. By way of example a line might include end to end trips as well as some trips turned back at a short line terminal. Each of these would be a variant. The Planned service descriptions are also coded into NETPLAN by variant. Tract level Census data is also coded into NETPLAN consistent with the data identified in Table 3.1. Since income data is provided by Households we have used the low income share of Households in each tract as the low income population share.

A routine has been developed within NETPLAN to derive Title VI statistics from the Reference and Planned service descriptions. The statistics are computed by variant and aggregated to the line level. Each variant, both Reference and Planned, is defined by # of Trips Operated, In Service Hours Operated, In Service Miles Operated, and the Census variables Total Population, Minority Population, and Low Income Population. The demographic data associated with each variant is derived from aggregating the applicable data for all tracts touched by a one quarter mile buffer associated with each of the bus stops of the variant.

The impacted populations for each variant are represented by the difference between the Planned and Reference data. The NETPLAN routine weights these differences by the number of trips operated for the variant. Unlike traditional Title VI evaluations this approach gives greater weight to populations served by more frequent service. The results are then aggregated to the line level.

4. Line and Line Group Analysis

Tables 4-1, 4-2 and 4-3 provide the line and line group results for weekdays, Saturdays and Sunday/Holidays respectively. The columns are as follows:

Major Change – Only lines or line groups undergoing major changes have an entry in this column. The codes indicate major changes as follows:

Code	Description
Yes+	Major service increases and beneficial
New	New service and beneficial
Yes-	Major service decreases and adverse
Discontinue	Discontinued service and adverse

Line or Line Group - A line or group of related lines being evaluated.

Impacted Minority Trips % - The trip weighted minority share of the impacted population.

Impacted Low Income Trips % - The trip weighted low income share of the impacted population.

Comments - Indicates Disparate Impact if the minority share of an adverse service change exceeds 78.5%. Indicates Disproportionate Burden if the low income share of an adverse service change exceeds 21.9%.

Table 4-1

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
Yes-	2, 200	30.41%	71.81%	Disproportionate Burden
	4, 704	50.12%	45.12%	
Yes+	10	82.92%	54.80%	
	14	64.35%	48.04%	
	16, 617	64.26%	58.71%	
	18, 20, 720	72.65%	52.98%	
	28, 684, 728	69.32%	37.24%	
	33, 733	69.23%	39.27%	
Yes+	35	89.32%	61.47%	
Yes-	40, 740	88.34%	41.98%	Disparate Impact & Disproportionate Burden
	45, 745	99.29%	73.03%	
	51	93.06%	70.03%	
Yes+	53	92.32%	61.78%	
Yes+	55	95.78%	64.61%	
	60, 760	97.62%	55.53%	
Yes+	62, 262	55.54%	117.90%	
Yes+	66, 605, 665	91.65%	64.80%	
	68, 70, 770	112.89%	57.70%	
Yes+	71, 106	103.38%	56.39%	
Yes+	76	84.34%	57.37%	
	78, 179	61.73%	27.71%	
	81	83.69%	58.25%	
Discontinue	83	82.83%	49.52%	Disparate Impact & Disproportionate Burden
Yes+	90, 290, 690	89.65%	38.65%	
	92	65.84%	43.89%	
Yes+	94, 294, 794	51.86%	40.86%	
Yes-	96, 296	64.38%	49.84%	Disproportionate Burden
	102	102.65%	63.31%	
	105, 705	67.28%	48.66%	
Yes+	108	110.89%	65.25%	
Yes+	110	89.42%	54.94%	
Yes+	111	94.60%	52.94%	

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
	115	114.58%	55.64%	
	117	94.84%	49.52%	
Yes+	120, 621	97.19%	55.70%	
Yes+	125	88.54%	42.37%	
Discontinue	126	76.97%	39.87%	Disproportionate Burden
Yes+	127	95.99%	47.13%	
	128	82.57%	17.69%	
Yes+	130, 130A	95.07%	50.80%	
	134, 534	18.53%	25.97%	
	150, 240, 245, 750	52.30%	45.70%	
	152	0.67%	-6.80%	
Yes+	153, 154	48.81%	45.79%	
Yes-	155, 183	40.61%	49.20%	Disproportionate Burden
Yes+	158, 167	-164.71%	94.48%	
	161	10.03%	22.80%	
Yes+	162, 163	64.69%	45.09%	
Yes+	164	49.38%	41.66%	
	165	64.95%	45.80%	
	166	110.97%	53.08%	
Yes+	169, 645	73.99%	47.67%	
Discontinue	175	55.25%	49.22%	Disproportionate Burden
Yes+	176, 287	78.64%	37.70%	
Yes-	177	26.61%	12.59%	
Yes+	180, 780	40.39%	42.96%	
New	182	77.93%	45.59%	
Discontinue	201	63.08%	48.02%	Disproportionate Burden
Yes-	202	94.58%	51.74%	Disparate Impact & Disproportionate Burden
es+	204, 754	92.18%	65.84%	
	205	74.08%	52.68%	
Yes+	206	88.10%	60.83%	
	207, 757	98.31%	47.48%	
Yes-	209	92.66%	60.08%	Disparate Impact & Disproportionate Burden
Yes+	210, 610, 710	84.72%	41.88%	
Yes+	211	89.31%	48.64%	
Yes+	212	80.43%	44.38%	
Discontinue	217	40.42%	40.83%	Disproportionate Burden

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
Yes-	218	19.26%	27.44%	Disproportionate Burden
Yes-	222, 237, 656	53.02%	46.37%	Disproportionate Burden
	224	76.53%	57.03%	
Yes+	230	68.17%	49.34%	
Yes+	232	58.13%	38.20%	
Yes+	233	80.42%	52.50%	
Yes+	234, 734	86.43%	50.37%	
Yes+	236	66.56%	70.84%	
Yes-	239	83.42%	35.36%	Disparate Impact & Disproportionate Burden
Yes+	243	58.06%	34.19%	
New	244	61.85%	36.06%	
	246	74.48%	38.29%	
Yes+	251, 751	97.26%	55.11%	
Discontinue	252	96.05%	59.17%	Disparate Impact & Disproportionate Burden
Discontinue	254	98.52%	60.22%	Disparate Impact & Disproportionate Burden
Yes+	256, 256A, 256C	72.05%	35.65%	
	258	292.66%	142.13%	
Yes+	260, 261, 660, 762	90.62%	50.91%	
Yes+	265	84.71%	36.81%	
Yes+	266	82.50%	36.52%	
Yes+	267, 662	64.30%	44.77%	
Yes-	268	49.35%	29.14%	Disproportionate Burden
	344	59.19%	28.25%	
Discontinue	442	86.06%	56.63%	Disparate Impact & Disproportionate Burden
New	450	81.45%	55.44%	
	460	80.09%	49.18%	
Yes+	487	79.47%	65.87%	
Yes-	501	116.38%	-42.78%	Disparate Impact
Yes-	550	74.87%	49.49%	Disproportionate Burden
Yes+	577	72.35%	-7.80%	
Yes-	601	48.68%	37.07%	Disproportionate Burden
	602	33.42%	35.99%	
Yes+	603	82.70%	59.54%	
Discontinue	607	92.25%	46.89%	Disparate Impact & Disproportionate Burden

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
Yes-	611	97.99%	57.28%	Disparate Impact & Disproportionate Burden
Discontinue	612	97.52%	54.10%	Disparate Impact & Disproportionate Burden
Discontinue	625	34.01%	21.38%	
Discontinue	685	57.48%	43.35%	Disproportionate Burden
New	686	47.72%	28.97%	
Discontinue	687	57.45%	34.52%	Disproportionate Burden
Discontinue	744	71.61%	47.91%	Disproportionate Burden
Yes+	761, 788	63.99%	45.11%	
	901	59.32%	45.70%	
	910	64.15%	21.80%	

Table 4-2

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes-	2, 200	445.96%	51.05%	Disparate Impact & Disproportionate Burden
	4, 704	51.71%	45.50%	
	10	78.67%	53.11%	
	14	10.70%	27.33%	
	16, 617	69.92%	49.56%	
	18, 20, 720	79.09%	55.05%	
Yes+	28, 684, 728	105.41%	54.84%	
Yes-	30	80.70%	55.96%	Disparate Impact & Disproportionate Burden
	33, 733	69.85%	41.15%	
Yes+	35	89.41%	61.51%	
Yes-	40, 740	88.90%	44.83%	Disparate Impact & Disproportionate Burden
	45, 745	99.39%	75.54%	
	51	93.36%	68.65%	
	53	92.07%	41.70%	
	55	100.14%	70.92%	
	60, 760	4367.49%	-875.12%	
Yes+	62, 262	74.92%	65.49%	

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
	66, 605, 665	91.93%	68.97%	
Yes+	68, 70, 770	99.19%	54.36%	
Yes+	71, 106	100.35%	56.13%	
	76	145.10%	-48.83%	
Yes-	78, 179	79.06%	42.81%	Disparate Impact & Disproportionate Burden
	81	75.71%	53.72%	
Discontinue	83	82.77%	49.42%	Disparate Impact & Disproportionate Burden
Yes+	90, 290, 690	86.68%	39.99%	
	92	78.61%	42.05%	
Yes+	94, 294, 794	32.77%	31.02%	
Yes-	96, 296	72.30%	56.19%	Disproportionate Burden
	102	104.99%	61.94%	
	105, 705	63.82%	47.48%	
	108	129.70%	76.39%	
	110	83.33%	56.45%	
Yes+	111	89.14%	41.55%	
	115	119.55%	60.90%	
	117	97.42%	55.84%	
Yes+	120, 621	90.82%	44.43%	
Yes+	125	89.01%	42.60%	
	126			
New	127	94.09%	46.39%	
New	128	89.80%	42.05%	
Yes+	130, 130A	75.65%	38.89%	
	134, 534	19.38%	26.52%	
	150, 240, 245, 750	60.97%	50.16%	
Yes+	152	130.50%	86.52%	
New	153, 154	48.59%	42.98%	
Yes-	155, 183	36.58%	38.74%	Disproportionate Burden
	158, 167	91.22%	44.06%	
	161	102.15%	36.49%	
Yes+	162, 163	62.17%	43.91%	
	164	67.19%	48.30%	
Yes+	165	66.25%	46.54%	
Yes+	166	89.89%	45.42%	
New	169, 645	75.25%	44.59%	

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
	175			
New	176, 287	84.43%	42.95%	
	177			
Yes+	180, 780	33.01%	40.09%	
New	182	77.93%	45.59%	
Discontinue	201	63.21%	48.16%	Disproportionate Burden
	202			
	204, 754	93.00%	66.07%	
Yes+	205	79.84%	44.12%	
Yes+	206	88.22%	60.79%	
Yes+	207, 757	94.86%	57.02%	
	209			
Yes+	210, 610, 710	85.11%	45.42%	
New	211	88.40%	47.64%	
Yes+	212	80.26%	42.99%	
Discontinue	217	38.93%	41.80%	Disproportionate Burden
Yes-	218	19.34%	27.23%	Disproportionate Burden
Yes-	222, 237, 656	41.01%	45.86%	Disproportionate Burden
	224	44.09%	25.11%	
	230	74.72%	42.54%	
	232	60.36%	39.03%	
Yes+	233	81.28%	52.61%	
Yes+	234, 734	82.04%	49.48%	
Yes+	236	66.35%	64.29%	
New	239	49.63%	38.07%	
	243	62.33%	41.31%	
New	244	61.85%	36.06%	
	246	89.34%	47.11%	
	251, 751	97.14%	51.37%	
Discontinue	252	96.80%	60.47%	Disparate Impact & Disproportionate Burden
Discontinue	254	98.52%	60.22%	Disparate Impact & Disproportionate Burden
Yes+	256, 256A, 256C	59.38%	35.53%	
New	258	89.80%	46.83%	
Yes+	260, 261, 660, 762	90.37%	50.80%	
Yes+	265	84.71%	36.81%	
Yes+	266	82.49%	36.50%	

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes+	267, 662	67.88%	42.21%	
Yes-	268	56.15%	30.90%	Disproportionate Burden
	344	58.77%	27.96%	
	442			
New	450	79.76%	51.51%	
	460	79.82%	48.76%	
Yes-	487	77.32%	52.37%	Disproportionate Burden
	501	41.71%	48.79%	
Discontinue	550	72.43%	42.84%	Disproportionate Burden
	577			
Yes-	601	48.62%	37.04%	Disproportionate Burden
	602	1.15%	10.41%	
	603	80.90%	56.81%	
	607			
Yes-	611	97.99%	57.31%	Disparate Impact & Disproportionate Burden
Discontinue	612	97.52%	54.10%	Disparate Impact & Disproportionate Burden
	625			
	685			
New	686	47.72%	28.97%	
Discontinue	687	57.32%	34.43%	Disproportionate Burden
Discontinue	744	79.03%	50.86%	Disparate Impact & Disproportionate Burden
New	761, 788	66.53%	46.90%	
	901	66.30%	46.55%	
	910	77.94%	48.57%	

Table 4-3

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes-	2, 200	44.14%	54.83%	Disproportionate Burden
Yes+	4, 704	52.12%	45.11%	

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes+	10	86.19%	57.20%	
	14	185.14%	97.02%	
Yes+	16, 617	74.10%	52.64%	
Yes+	18, 20, 720	76.39%	54.94%	
Yes-	28, 684, 728	495.96%	106.91%	Disparate Impact & Disproportionate Burden
Yes-	30	80.13%	55.55%	Disparate Impact & Disproportionate Burden
	33, 733	70.72%	43.09%	
Yes+	35	90.24%	60.79%	
Yes+	40, 740	87.66%	40.17%	
Yes+	45, 745	93.30%	66.60%	
	51	92.85%	72.58%	
Yes+	53	92.97%	58.67%	
Yes+	55	94.34%	64.55%	
Yes+	60, 760	92.27%	57.80%	
Yes-	62, 262	64.03%	86.01%	Disproportionate Burden
Yes+	66, 605, 665	91.12%	65.89%	
	68, 70, 770	101.26%	55.43%	
Yes+	71, 106	100.35%	56.13%	
	76	80.14%	64.75%	
	78, 179	75.80%	40.48%	
Yes+	81	81.64%	56.68%	
Discontinue	83	82.77%	49.43%	Disparate Impact & Disproportionate Burden
Yes+	90, 290, 690	80.86%	41.71%	
Yes+	92	63.40%	44.71%	
Yes+	94, 294, 794	52.15%	38.62%	
Yes+	96, 296	100.49%	78.79%	
	102	104.99%	61.94%	
Yes+	105, 705	72.99%	51.85%	
Yes+	108	110.03%	64.89%	
Yes+	110	85.90%	52.62%	
Yes+	111	90.31%	43.95%	
Yes+	115	107.72%	56.32%	
	117	93.70%	46.43%	
Yes+	120, 621	90.82%	44.43%	
Yes+	125	89.41%	42.80%	

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
	126			
New	127	94.09%	46.39%	
New	128	89.80%	42.05%	
Yes+	130, 130A	75.65%	38.89%	
Yes+	134, 534	18.59%	25.95%	
Yes+	150, 240, 245, 750	53.88%	40.53%	
Yes+	152	92.43%	58.36%	
New	153, 154	48.59%	42.98%	
Yes-	155, 183	41.33%	43.07%	Disproportionate Burden
	158, 167	100.53%	47.70%	
Yes+	161	41.41%	26.83%	
Yes+	162, 163	65.50%	45.25%	
Yes+	164	63.37%	45.41%	
Yes+	165	65.59%	46.16%	
Yes+	166	85.40%	43.62%	
New	169, 645	75.25%	44.59%	
	175			
New	176, 287	84.43%	42.95%	
	177			
Yes+	180, 780	34.43%	40.75%	
New	182	77.93%	45.59%	
Discontinue	201	63.21%	48.16%	Disproportionate Burden
	202			
Yes+	204, 754	92.11%	65.88%	
	205	79.55%	44.78%	
Yes+	206	88.29%	60.83%	
Yes+	207, 757	91.81%	56.83%	
	209			
Yes+	210, 610, 710	85.79%	46.16%	
New	211	88.40%	47.64%	
Yes+	212	77.58%	44.30%	
Discontinue	217	39.03%	42.04%	Disproportionate Burden
Yes-	218	19.44%	26.84%	Disproportionate Burden
Yes-	222, 237, 656	41.01%	45.86%	Disproportionate Burden
	224	56.36%	64.18%	
Yes+	230	74.62%	42.66%	
	232	59.94%	38.89%	

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes+	233	81.50%	52.52%	
Yes+	234, 734	81.34%	48.85%	
Yes+	236	66.35%	64.29%	
New	239	49.63%	38.07%	
New	243	56.94%	32.03%	
New	244	61.85%	36.06%	
	246	78.12%	42.67%	
Yes+	251, 751	97.14%	56.05%	
Discontinue	252	96.80%	60.47%	Disparate Impact & Disproportionate Burden
	254			
Yes+	256, 256A, 256C	68.42%	38.40%	
New	258	89.80%	46.83%	
Yes+	260, 261, 660, 762	89.98%	49.67%	
Yes+	265	84.71%	36.81%	
Yes+	266	82.54%	36.53%	
Yes+	267, 662	67.88%	42.21%	
Yes-	268	56.15%	30.90%	Disproportionate Burden
	344	58.72%	27.92%	
	442			
New	450	79.76%	51.51%	
	460	79.72%	48.73%	
Yes-	487	77.39%	52.13%	Disproportionate Burden
	501	41.71%	48.79%	
Discontinue	550	72.43%	42.84%	Disproportionate Burden
	577			
Yes-	601	48.62%	37.04%	Disproportionate Burden
Yes+	602	27.19%	30.06%	
	603	82.29%	58.74%	
	607			
Yes-	611	97.99%	57.31%	Disparate Impact & Disproportionate Burden
Discontinue	612	97.52%	54.10%	Disparate Impact & Disproportionate Burden
	625			
	685			
New	686	47.72%	28.97%	
Discontinue	687	57.32%	34.43%	Disproportionate Burden

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Discontinue	744	79.03%	50.86%	Disparate Impact & Disproportionate Burden
New	761, 788	66.53%	46.90%	
	901	66.30%	46.55%	
	910	77.94%	48.57%	

4.1 Disparate Impacts for Line or Line Groups

The NextGen proposals impact 112 bus lines or line groups of which 17 would experience a Disparate Impact to minority riders on one or more day types (Weekdays, Saturdays, and Sunday/Holidays). Each of these changes has been proposed consistent with the objectives of the system restructuring which include more frequent local service, improved connectivity, improved cost effectiveness, and inclusion of alternative services in areas of low demand. The services experiencing Disparate Impacts are identified in Table 4-4. The table shows the day types impacted and alternative services that would be available to impacted riders.

Table 4-4

Services Experiencing Disparate Impacts		
Line/Line Group	Day Type	Alternatives
2/200	Saturday	Lines 2 and 4
28/684/728	Sunday	New Line 684, frequent L Line Gold, Bus Line 81
30	Saturday, Sunday	Frequent network (westside)/L line Gold/Bus Line 106
40/740	Weekday, Saturday	Lines 40, 212
78/179	Saturday	Lines 78, 179 commensurate with demand
83	All	L Line Gold, Bus Lines 81 and new Line 182
202	Weekday	Line 202 (Artesia-Willowbrook + Lines 205, 232, 246 + Long Beach Transit Lines 1, 52, 191, 192
209	Weekday	Line 209 (144 th /Crenshaw-Crenshaw Expo Line + Line 210
239	Weekday	Line 239 (Ventura-Rinaldi) + Line 236 San Fernando Mission
252	All	Lines 182, 251, MicroTransit (Lincoln Heights)
254	Weekday, Saturday	Frequent network proximity (Lines 55, 60, 110, 111, 115, 117, 251, 605, 665), new MicroTransit
442	Weekday	Frequent Lines 115, C Line Green connecting to J Line (Silver)
501	Weekday	Frequency adjusted consistent with demand
607	Weekday	New MicroTransit

Services Experiencing Disparate Impacts		
Line/ Line Group	Day Type	Alternatives
611	All	New Line 611, extended Line 102, overlap or proximity of Lines 55, 60, 105, 111, 260
612	All	Frequent network proximity (Lines 55, 60, 111, 115, 117, 251, 260, 261), new MicroTransit
744	Saturday, Sunday	Lines 233, 240, 761

4.2 Disproportionate Burdens for Lines or Line Groups

The NextGen proposals impact 112 bus lines or line groups of which 31 would experience a Disproportionate Burden to low income riders on one or more day types (Weekdays, Saturdays, and Sunday/Holidays). Each of these changes has been proposed consistent with the objectives of the system restructuring which include more frequent local service, improved connectivity, improved cost effectiveness, and inclusion of alternative services in areas of low demand.

With the exception of Lines 177 and 625 on weekdays, every line or line group proposed for significant service reductions would experience a Disproportionate Burden on low income riders. This is largely a consequence of the fact that much of Metro's fixed route service operates in corridors that have a larger share of low income residents than the service area as a whole. Lines experiencing both a Disparate Impact and a Disproportionate Burden are presented in Table 4-4 along with lines experiencing only Disparate Impacts. The lines and line groups experiencing only a Disproportionate Burden along with their alternative services are identified in Table 4-5.

Table 4.5

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
96, 296	Weekday, Saturday	Line 96 alignment would be retained between Burbank and Riverside/Figueroa, then via Figueroa St to the Lincoln/Cypress L Line (Gold) station. Connections would also be available with Line 81 to downtown LA. Hourly service would be retained. The line would be renumbered 296 consistent with Metro line numbering convention.
126	Weekday	Line 126 would be discontinued. This service operates weekday peak periods only with very low utilization. Frequent all-day all -week Lines 125, 210, 212, 215, and 232 as well as Torrance Transit Line 8, G-Trans Line 5, Beach Cities Transit Line 109 and LADOT Commuter Express Line 438 would serve the areas served by Line 126.
155, 183	All	Lines 155 and 183 would be combined as new Line 155 between Universal City and North Hollywood Stations maintaining existing coverage on Tujunga, Riverside, and Magnolia. Line 155 service on Olive would be replaced by frequent Burbank Bus Pink Line service which is much more frequent than Line 155. Line 183 east of North Hollywood Station would be replaced by more frequent Line 94

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
		service. Lower usage segment of Line 183 between Burbank and Glendale would have alternative service such as Metro Lines 94 and 92 in Burbank and Lines 92, 94, 180, and 290 in Glendale on the same street or within less than 0.25 mile, excepting eastern parts of Glendale where Metro MicroTransit service would be available.
201	All	Line 201 would be discontinued. This line operates hourly and has very low ridership and productivity. Ridership is especially low in the Silver Lake area and no replacement service is proposed on Silver Lake Bl. Nearest alternative services would be new Line 2 (Sunset Bl/Alvarado St), and new Line 182 (Rowena Av). In the central Glendale area alternative services Line 92 (Brand Bl/Glendale Av), Line 94 (Broadway, Brand Bl, San Fernando Rd), Line 180 (Broadway, Central Av), and Line 603 (San Fernando Rd) either duplicate this service or are with a 0.25 mile walk. In Glendale northeast of San Fernando Rd, Metro new MicroTransit on demand service will have a zone that includes Chevy Chase and Glendale Adventist Medical Center.
217	All	Lines 180, 181, 217, and 780 would be consolidated as one high frequency Line 180 service linking West LA/Expo Line, Hollywood, Glendale, Eagle Rock, and Pasadena via the existing Line 217 and 780 alignment on Fairfax Av, Hollywood Bl, and Colorado Bl via the current Line 180/780 alignment to Glendale, Eagle Rock, and Pasadena. All bus stops on the corridor would receive high frequency service, with bus speed improvement tools such as stop rationalization, bus lanes, and transit signal priority being deployed to maintain competitive on-board travel times. The combination of the frequency, access and speed improvements would provide competitive average travel times for existing and potential future riders. In Glendale, service on Central Av would be relocated to Brand Bl and would continue to serve Broadway, while in Eagle Rock and Pasadena Line 180 would operate via the existing alignment on Colorado Bl, terminating at Pasadena City College. Line 181 service on Yosemite Dr in Eagle Rock would be replaced by Line 81 and service on Colorado Bl east of Pasadena City College would continue to be served by Foothill Transit Line 187. Line 180 service on Lake Av in Pasadena would be replaced by new Metro Line 662. Line 217 service south of the Expo Line where utilization is low would be replaced by Culver CityBus Lines 4 and 6 and Metro Line 108.
218	All	Line 218 would continue to operate its existing alignment from Ventura Bl through Laurel Canyon and Crescent Heights to Fairfax & Santa Monica. Lines 4 and 180 would be available for connections to destinations west and south of this location, as well as West Hollywood CityRide for connecting service to Beverly Center/Cedars Sinai Medical Center, replacing Line 218 on Fairfax Av and 3rd St. Service frequency would be commensurate with existing utilization, with Line 240 connecting to B Line (Red) rail service to Hollywood with connections to Line 180 also being a faster alternative service for some riders.

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
222, 237, 656	All	Line 222 would still serve Hollywood Wy south of Vanowen St then be realigned to serve Riverside Dr and Vineland Av to Universal City Station (a more direct connection to this important hub) and Cahuenga Bl to Universal Studios Dr (replacing Line 237). The Line would have improved weekday and evening service frequency. Service between Universal City Station and Hollywood would be available on the B Line (Red) rail service while Line 222 service on Sunland Bl would be replaced by new Line 290, and Line 294 would serve Hollywood Wy area beside Burbank Airport. Service would not be retained on the low utilization segment of Line 222 on Cahuenga Bl, Barham Bl, Olive Av segment south of Riverside Dr.
		Line 237 would continue to operate on Woodley Av between the Metro G Line Orange BRT and Rinaldi St. Line 237 on Burbank Bl between Van Nuys Bl and Whitsett would be served by Line 154 which would continue via Burbank Bl rather than Chandler Bl that Line 237 operates on today. Line 224 would replace Line 237 on Lankershim Bl, while Line 222 would replace Line 237 on Vineland Av south of Riverside Dr and a segment of Cahuenga Bl south to Universal Studios Dr. Line 237 south of there to Hollywood would not be replaced with bus service through Cahuenga Pass though B Line (Red) rail service would be available between Universal Station and Hollywood.
		Line 656 overnight Owl service would be modified to operate a modified route from Normandie Av/Santa Monica Bl through Hollywood and Cahuenga Bl and Lankershim Bl to North Hollywood Station. Line 656 service north of North Hollywood Station would be replaced by new Line 162 and 234 overnight Owl services on Sherman Wy and Sepulveda Bl respectively as well as continued Line 901 G Line (Orange) and Line 233 Van Nuys Bl Owl service.
268	All	Line 268 would discontinue service north of Foothill Bl on Baldwin, Sierra Madre, & Michillinda maintaining service on Foothill Bl between El Monte Station and the L Line (Gold) Sierra Madre Villa Station. Line 268 segment from Sierra Madre Villa Station and Pasadena/Altadena/Jet Propulsion Lab would be replaced by Line 256 on Altadena Bl & Washington Bl. Service north of Washington Bl and on Lincoln Bl. would be replaced by Line 662. New Metro MicroTransit would be available to Jet Propulsion Lab from the Cities of Pasadena, Altadena, and Sierra Madre.
487	Saturday, Sunday	Lines 487 (during peak period) and 489 would be modified to terminate at 7th/Metro area in downtown LA, discontinuing their low utilization extension to Westlake/MacArthur Park which can be reached with connecting B/D Line (Red/Purple) rail service and Line 20 or 720 (weekday peak only). Off-peak period Line 487 would terminate service at the Union Station. Line 487 would be altered to terminate at its eastern end at Sierra Madre Villa Station. Line 487 segment between Sierra Madre Villa Station and Arcadia Station, which has low utilization, would be replaced by new Metro MicroTransit on demand

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
		service. Line 487 segment between Arcadia Station and El Monte Station via Santa Anita Av would be replaced by new Line 287. Line 487 would have improved weekday frequency.
550	All	The Line 550 segment between Harbor Gateway Transit Center and USC via the Harbor Transitway would be retained peak periods weekdays, while the segment between San Pedro and Harbor Gateway Transit Center would be replaced in San Pedro by DASH on Gaffey St and 13th St, Line 205 on 7th St, and Line 246 (rerouted to serve Gaffey St between Channel St and Anaheim St). North of Pacific Coast Highway, Line 205 and Torrance Transit would serve Vermont Av in place of Line 550.
601	All	Line 601 would not change alignment but would continue to operate weekdays and weekends with still frequent 15 min. service rather than the 10 min. service daytime today, due to underutilization. The overnight Owl service on this line would also be discontinued due to very low ridership.
685	Weekday	Line 685 weekday only service would be discontinued due to low productivity as a result of low utilization. New MicroTransit serves as a replacement service and operates 7 days a week, with Line 290 also maintaining service to Glendale Community College.
687	All	Line 687 would be discontinued with replacement service available on new Line 662 on Los Robles Av south of Washington Bl to Del Mar L Line (Gold) Station. Due to low utilization, the service on Los Robles Av north of Washington Bl would be replaced new Metro MicroTransit service with connections to Pasadena, with alternative service also available on Line 260 (Fair Oaks Av) and Line 662 (Lake Av).

5. Service Type Analysis

In addition to the line and line groups analysis an analysis was performed by service type. The collective changes for all lines of each service type were evaluated to determine whether in combination they resulted in a significant service change, and if such changes were adverse.

The results of this analysis are shown in Tables 5-1, 5-2 and 5-3 for the respective day types of Weekdays, Saturdays, and Sunday/Holidays. The thresholds shown in the tables are the values that must be exceeded for adverse impacts to be classified as Disparate Impacts or Disproportionate Burdens.

Table 5-1 Weekday Impacts by Service Type

Service Type	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Local	Sig+	Increase	80.29%	53.26%
Express			76.10%	53.10%

Shuttle	Sig+	Increase	54.78%	35.68%
Rapid	Sig-	Decrease	74.18%	51.56%
BRT			56.26%	60.90%
All Bus			83.93%	53.84%
Thresholds			78.5%	21.9%

Table 5-2 Saturday Impacts by Service Type

Service Type	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Local			79.65%	51.81%
Express			85.87%	45.06%
Shuttle	Sig+	Increase	43.56%	20.38%
Rapid	Sig-	Decrease	73.76%	53.16%
BRT			54.90%	44.57%
All Bus	Yes	Increase	81.74%	49.52%
Thresholds			78.5%	21.9%

Table 5-3 Sunday/Holiday Impacts by Service Type

Service Type	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Local	Sig+	Increase	79.38%	52.45%
Express	Sig+	Increase	88.72%	43.06%
Shuttle	Sig+	Increase	51.20%	28.56%
Rapid	Sig-	Decrease	70.93%	52.81%
BRT			54.90%	44.57%
All Bus	Sig+	Increase	80.25%	51.79%
Thresholds			78.5%	21.9%

5.1 Disparate Impacts by Service Type

Only the Rapid Bus service type experienced significant service reductions, and none of those resulted in a Disparate Impact to minorities.

5.2 Disproportionate Burdens by Service Type

Only the Rapid Bus service type experienced significant service reductions for each day type, and all of these resulted in Disproportionate Burdens on low income populations. In every case reductions in Rapid Bus service were combined with increases in Local services so that all riders in each corridor will see increased service frequencies not just those served by Rapid bus stops.

6. Service Council Area Analysis

An additional analysis was performed by Service Council area to determine if there were adverse geographic consequences from the NextGen proposals. The collective changes for all lines within each Service Council area were evaluated to determine whether in combination they resulted in a significant service change, and if such changes were adverse.

The results of this analysis are shown in Tables 6-1, 6-2 and 6-3 for the respective day types of Weekdays, Saturdays, and Sunday/Holidays. The thresholds shown in the tables are the values that must be exceeded for adverse impacts to be classified as Disparate Impacts or Disproportionate Burdens.

Table 6-1 Weekday Impacts by Service Council Area

Service Council	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Gateway			94.88%	49.52%
South Bay			89.28%	54.48%
SFV			77.77%	49.48%
SGV			61.61%	48.35%
Westside			101.66%	66.51%
All Bus			83.93%	53.84%
Thresholds			78.5%	21.9%

Table 6-2 Saturday Impacts by Service Council Area

Service Council	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Gateway			86.18%	20.51%
South Bay			89.39%	44.57%
SFV			77.68%	47.83%
SGV			78.65%	49.90%
Westside			84.76%	58.72%
All Bus		Increase	81.74%	49.52%
Thresholds			78.5%	21.9%

Table 6-3 Sunday/Holiday Impacts by Service Council Area

Service Council	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Gateway	Sig+	Increase	89.72%	46.94%
South Bay	Sig+	Increase	88.09%	53.27%
SFV	Sig+	Increase	72.67%	46.14%
SGV			78.90%	49.04%
Westside			79.45%	56.36%
All Bus	Sig+	Increase	80.25%	51.79%
Thresholds			78.5%	21.9%

6.1 Disparate Impacts by Service Council Area

As no Service Council area experienced a significant decline in service there are no Disparate Impacts by Service Council area.

6.2 Disproportionate Burdens by Service Council Area

As no Service Council area experienced a significant decline in service there are no Disproportionate Burdens by Service Council area.

7. Public Outreach

The NextGen Bus Study has been conducted around a firm foundation of rider, community, and stakeholder engagement since the study began in mid-2017, during initial input and data gathering, analysis, and findings phases through to the draft Bus Plan. This has included:

- 330+ partnerships with community and stakeholder groups
- 400+ stakeholder meetings, community events, and public workshops
- 64,000 webpage visits
- 25,000+ virtual workshop views
- 16,000+ constructive and positive comments received
- 8.9 million digital and print as impressions
- 12,000+ on-line survey responses

595,000+ Metro take-one brochures delivered to on transit lines, schools, libraries, community centers and city halls

Of particular significance is the 9 meetings held with the NextGen External Working Group of stakeholders formed to advise the project. This working group consists of 61 members representing a variety of stakeholder groups and community organizations throughout LA County, including groups such as Service Councils, Advisory Councils, Business and Community Organizations, Chambers of Commerce, Educational Institutions, Government Agencies, Non-Profit, Faith-Based Institutions, Transportation Agencies, Transportation Services and Groups and Union Groups providing a diverse representation of the community.

In January 2020, the Metro Board of Directors authorized staff to release the draft NextGen Bus Plan for public review. A series of 15 public workshops were conducted in February/March prior to COVID-19 ending that in person effort (23 workshops were originally scheduled), with an ongoing active on-line presence continuing for the project since then. The workshops were held as follows:

- Feb. 1 @ 10am: Los Angeles Trade Technical College

- Feb. 4 @ 4pm: Grand Annex Wilmington
- Feb. 5 @ 4pm: Marvin Braude Constituent Center Van Nuys
- Feb. 10 @ 4pm: El Monte Station
- Feb. 12 @ 4pm: Plummer Park West Hollywood
- Feb. 13 @ 4pm: Clearwater Building Paramount
- Feb. 19 @ 4pm: East Los Angeles College
- Feb. 20 @ 4pm: Pasadena Senior Center
- Feb. 22 @ 10am: Los Angeles Metro Headquarters
- Feb. 25 @ 4pm: Bell Community Center
- Feb. 26 @ 4pm: The Foundation Center, Western Ave near Imperial Ave
- Feb. 27 @ 4pm: Rose Goldwater Community Center Canoga Park
- Mar. 5 @ 4pm: Norwalk Arts & Sports Complex
- Mar. 7 @ 10am: Providence Wellness Center
- Mar. 11 @ 4pm: Asian Youth Center San Gabriel

Total attendance at these workshops was 1,025. Staff received over 1,500 constructive comments that helped staff update the plan with 18 significant changes addressing concerns primarily with segments or lines that had been proposed for elimination.

A revised draft Bus Plan was issued to July 2020. Details were provided in an on-line booklet as well as a summary booklet distributed on board buses and trains and by staff at key transit hubs in the lead up to six public hearings. The same details contained in the summary booklet were provided for the public hearings.

Notice of intent to hold this public hearing with the required 30-days of notice was published in the following publications:

- Armenian Media Network
- Asian Journal (L.A.)
- Korea Times
- La Opinión
- Los Angeles Times
- Los Angeles Sentinel
- Panorama (Russian)
- Pasadena Star News
- Rafu Shimpo (Japanese)
- South Bay Daily Breeze
- Watts Times
- World Journal (Chinese Daily News)

Information regarding the public hearings was also shared via Facebook, Nextdoor, Twitter, and Metro's blog, The Source.

There were also a number of groups subscribing to the NextGen project that received alerts for the public hearings as follows:

- NextGen Public Workshops list of 4,978 subscribers (6 separate email alerts sent)
- NextGen City Officials list of 162 subscribers (2 separate email alerts)
- NextGen External Working Group list of 140 subscribers (5 separate emails sent)
- Service Councils public mailing list of 423 subscribers (two emails sent)

Approximately 23,000 take one leaflets were distributed aboard Metro buses and over 4,000 take ones were distributed at major transit hubs.

Information regarding the hearings was also shared by la.streetsblog.org, on the Cal State LA, City of Malibu, City of Lynwood, and City of Vernon websites, in online community papers such as Larchmont Buzz and Malibu Times, and by local neighborhood Councils including North Hills West and Los Feliz Neighborhood Councils.

Table 7-1 provides a summary attendance at the public hearings and Table 7-2 provides a summary of unduplicated comments received during the public comment period from July 1, 2020 to August 27, 2020

Table 7-1 Summary of Public Hearing Participation

Next Gen Public Hearing Participation	Listened by Phone	Viewed Livestream	Viewed Archive
San Fernando Valley 8/19	8	91	5
South Bay Cities 8/20	8	27	21
All Regions 8/22	19	64	21
San Gabriel Valley 8/24	8	107	16
Westside Central 8/26	20	102	0
Gateway Cities 8/27	13	70	5
Totals	60	461	68
Total Participation			589

Table 7-2 Summary of Feedback Received During Public Comment Period of July 1, 2020 to August 27, 2020

Method	Number Received
Phone	27
eComments during hearings	118
Email	128
Virtual Workshop	14
USPS	5
Total Comments Received	292

These comments resulted in staff making a further seven substantive changes to the plan prior to seeking Service Council and Board approval for implementation.

8. CONCLUSIONS

The NextGen service restructuring proposals have been evaluated by line or line group, by service type, and by Service Council area. Based on the Service Equity Analysis conducted, Metro found that some lines will experience Disparate Impact and Disproportionate Burden when applying Metro's policies. However, Metro has evaluated alternatives and the current proposed changes have the least impact to the protected Title VI populations. Therefore, Metro meets the legal test outlined in FTA's Title VI Circular 4702.1B which states:

“There is a substantial legitimate justification for these changes. Metro can show that there are no alternatives to these proposals that would have a less disparate impact on minority riders, but would still accomplish Metro's legitimate program goals”.

The following findings were observed:

- Finding #1 – Of 112 lines or line groups evaluated there were 17 lines or line groups that would experience a Disparate Impact on minorities on one or more day types. Each of these proposals is consistent with the objectives of the service restructuring program, and alternative services have been identified in each instance that would provide service to most of the impacted riders.
- Finding #2 – There are no Disparate Impacts by service type.
- Finding #3 – There are no Disparate Impacts by Service Council area.
- Finding #4 – Of 112 lines or line groups evaluated there were 31 lines or line groups that would experience a Disproportionate Burden on low income populations on one or more day types. Every line or line group that was proposed for a significant service reduction, with the exception of Lines 177 and 625 on weekdays, would cause a Disproportionate Burden. This is largely a consequence of the fact that the areas within one quarter mile of all bus stops have a higher share of low income persons than the Metro service area as a whole. Every effort was made in the determination of these proposals to minimize the number of adversely impacted persons, and alternative services would be available in most identified instances.

Finding #5 – Only the Rapid Bus service type would experience a major reduction in services that would result in a Disproportionate Burden on low income populations. In all instances this adverse impact would be mitigated by an increase in service on Local services within each Rapid corridor.

Finding #6 – There are no Disproportionate Burdens by Service Council area.

Board Approval – Service Equity Analysis

22. SUBJECT: NEXTGEN BUS PLAN

[2020-0617](#)

RECOMMENDATION

APPROVE

- A. the NextGen Bus Plan, as adjusted through the public outreach and public hearing process, for implementation starting December 2020, and
- B. Approve the results of the Title VI Service Equity Analysis for the NextGen Bus Plan

- Attachments:**
- [Attachment A - NextGen Public Engagement Summary](#)
 - [Attachment B - Public Hearing Notice](#)
 - [Attachment C - Public Hearing Comment Summary](#)
 - [Attachment D - Line Level Proposals](#)
 - [Attachment E - Stop Optimization Proposals](#)
 - [Attachment F - Title VI Analysis](#)
 - [Attachment G - Regional Service Council Vote Summary](#)

22. SUBJECT: NEXTGEN BUS PLAN

2020-0617

APPROVED

- A. the NextGen Bus Plan, as adjusted through the public outreach and public hearing process, for implementation starting December 2020, and
- B. the results of the Title VI Service Equity Analysis for the NextGen Bus Plan

KB	MRT	JF	JDW	MB	EG	HS	AN	RG	JB	PK	JH	SK
Y	A	Y	Y	Y	A	Y	Y	Y	Y	Y	N	Y

ADJOURNED AT 1:45 P.M. IN MEMORY OF LOUIS RABINOWITZ AND VICTOR VALENZUELA.

Prepared by: Jessica Vasquez Gamez
Administrative Analyst, Board Administration


Michele Jackson, Board Secretary

###

Board Approval



*Watch online: <http://boardagendas.metro.net>
Listen by phone: Dial 888-251-2949 and enter Access Code:
8231160# (English) or 4544724# (Español)*

Agenda - Final

Thursday, August 18, 2022

9:00 AM

To give written or live public comment, please see the top of page 4

Executive Management Committee

*Ara J. Najarian, Chair
Janice Hahn, Vice Chair
Kathryn Barger
James Butts
Eric Garcetti
Hilda Solis
Gloria Roberts (Interim), non-voting member
Stephanie Wiggins, Chief Executive Officer*

-
19. SUBJECT: EQUITY FOCUS COMMUNITIES 2022 REPORT BACK [2022-0489](#)

RECOMMENDATION

RECEIVE AND FILE a report back on using 2022 Equity Focus Communities (EFCs) to prioritize investments during the development of the Metro FY24 budget.

Attachments: [Attachment A - 2022 Equity Focus Communities – June 2022](#)
[Attachment B - Comparison of 2019 EFCs and 2022 EFCs - June 2022](#)

20. SUBJECT: STATE AND FEDERAL REPORT [2022-0498](#)

RECOMMENDATION

RECEIVE AND FILE August 2022 State and Federal Legislative Report.

21. SUBJECT: TITLE VI EQUITY ANALYSIS POLICIES [2022-0248](#)

RECOMMENDATION

ADOPT Title VI Equity Analysis Policies presented in Attachments A, B and C.

Attachments: [Attachment A - Major Service Change](#)
[Attachment B - Disparate Impact Policy](#)
[Attachment C - Disproportionate Burden Policy](#)

22. SUBJECT: SERVICE STANDARDS POLICIES FOR TITLE VI PROGRAM UPDATE [2022-0430](#)

RECOMMENDATION

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

Attachments: [Attachment A - Metro Systemwide Service Standards](#)

23. SUBJECT: SERVICE MONITORING RESULTS FOR TITLE VI PROGRAM UPDATE [2022-0431](#)

RECOMMENDATION

ADOPT Service Monitoring Results for Title VI Program Update presented in Attachment A.

Attachments: [Attachment A - Service Monitoring Review FY20-FY22](#)

- SUBJECT: GENERAL PUBLIC COMMENT [2022-0479](#)

RECEIVE General Public Comment

14. Board Approval of Systemwide Service Standards



Los Angeles County
Metropolitan Transportation Authority

Metro

CERTIFICATION

The undersigned, duly qualified and acting as Board Clerk of the Los Angeles County Metropolitan Transportation Authority, certifies that the following was approved, by majority vote of all members of the Board of Directors, at a regular meeting of the Los Angeles County Metropolitan Transportation Authority held on August 25, 2022.

**22. SUBJECT: SERVICES STANDARDS POLICIES FOR TITLE VI 2022-0430
PROGRAM UPDATE**

ADOPTED ON CONSENT CALENDAR Service Standards policies for Title VI Program Update.

JDW	JH	KB	MB	JB	FD	EG	PK	SK	HJM	TS	HS	AN
Y	A	Y	Y	Y	Y	Y	Y	A	Y	Y	A	Y

Collette Langston, Metro Board Clerk

DATED: August 25, 2022

15. Board Approval of Service Monitoring Results



Los Angeles County
Metropolitan Transportation Authority

Metro

CERTIFICATION

The undersigned, duly qualified and acting as Board Clerk of the Los Angeles County Metropolitan Transportation Authority, certifies that the following was approved, by majority vote of all members of the Board of Directors, at a regular meeting of the Los Angeles County Metropolitan Transportation Authority held on August 25, 2022.

**23. SUBJECT: SERVICES MONITORING RESULTS FOR TITLE VI 2022-0431
PROGRAM UPDATE**

ADOPTED ON CONSENT CALENDAR Service Monitoring Results for Title VI
Program Update.

JDW	JH	KB	MB	JB	FD	EG	PK	SK	HJM	TS	HS	AN
Y	A	Y	Y	Y	Y	Y	Y	A	Y	Y	A	Y

Collette Langston, Metro Board Clerk

DATED: August 25, 2022

16. Board Approval of Title VI Policies for Service and Fare Changes



Los Angeles County
Metropolitan Transportation Authority

Metro

CERTIFICATION

The undersigned, duly qualified and acting as Board Clerk of the Los Angeles County Metropolitan Transportation Authority, certifies that the following was approved, by majority vote of all members of the Board of Directors, at a regular meeting of the Los Angeles County Metropolitan Transportation Authority held on August 25, 2022.

21. SUBJECT: TITLE VI EQUITY ANALYSIS POLICIES **2022-0248**

ADOPTED ON CONSENT CALENDAR Title VI Equity Analysis Policies.

JDW	JH	KB	MB	JB	FD	EG	PK	SK	HJM	TS	HS	AN
Y	A	Y	Y	Y	Y	Y	Y	A	Y	Y	A	Y

Collette Langston, Metro Board Clerk

DATED: August 25, 2022

17. Board Approval of Title VI Program Update

INCLUDE Board Agenda and Board Resolution of Board Approval

APPENDIX

Appendix A – FTA Concurrence Letter

Appendix B – Metro Civil Rights Policy

Appendix C- Facilities Analysis

Appendix D – Metro Title VI Equity Policies Public Participation
(Service Council Agendas)

Appendix E – Metro Public Participation Plan