

TITLE VI COMPLIANCE REVIEW

OF THE

Los Angeles County Metropolitan Transportation Authority
(Metro)

Los Angeles, CA

Final Report

December 2011

Prepared For

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
OFFICE OF CIVIL RIGHTS

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I. GENERAL INFORMATION

Grant Recipient: Los Angeles County Metropolitan Transportation Authority

City/State: Los Angeles, CA

Grantee No: 5566

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Site Visit Dates: July 12-15, 2011

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II. JURISDICTION AND AUTHORITIES

The Federal Transit Administration (FTA) Office of Civil Rights is authorized by the Secretary of Transportation to conduct civil rights compliance reviews. The Los Angeles County Metropolitan Transportation Authority (Metro) is a recipient of FTA funding assistance and is therefore subject to the Title VI compliance conditions associated with the use of these funds pursuant to the following:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d).
- Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.).
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.).
- Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted).
- DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted).
- Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987).
- Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted).
- DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997).
- DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005).
- Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

III. PURPOSE AND OBJECTIVES

Purpose

The Federal Transit Administration (FTA) Office of Civil Rights periodically conducts discretionary reviews of grant recipients and subrecipients to determine whether they are honoring their commitments, as represented by certification, to comply with the requirements of 49 U.S.C. 5332. In keeping with its regulations and guidelines, FTA determined that a Compliance Review of the Los Angeles County Metropolitan Transportation Authority (Metro) Title VI Program was necessary.

The Office of Civil Rights authorized the DMP Group to conduct the Title VI Compliance Review of Metro. The primary purpose of this Compliance Review was to determine the extent to which Metro has met its General Reporting and Program-Specific Requirements and Guidelines in accordance with FTA Circular 4702.1A, "Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients." Members of the Compliance Review team also discussed with Metro the requirements of the DOT Guidance on Special Language Services to Limited English Proficient (LEP) Beneficiaries. The Compliance Review had a further purpose to provide technical assistance and to make recommendations regarding corrective actions, as deemed necessary and appropriate. The Compliance Review was not an investigation to determine the merit of any specific discrimination complaints filed against Metro.

Objectives

The objectives of FTA's Title VI Program, as set forth in FTA Circular 4702.1A, dated May 13, 2007, "Title VI and Title VI-Dependent Guidelines For Federal Transit Administration Recipients" are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency. The objectives of Executive Order 13166 and the "DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries" are for FTA grantees to take reasonable steps to ensure "meaningful" access to transit services and programs for limited English proficient (LEP) persons.

IV. BACKGROUND INFORMATION

The California State Legislature created the Los Angeles County Metropolitan Transportation Authority (LACMTA) in April, 1993 through a merger of the Los Angeles County Transportation Commission and the Southern California Rapid Transit District. "Transit" was expanded to "Transportation" as the agency combined both county-wide roles of the two predecessor agencies. There are thirteen voting members and one non-voting member (appointed by the Governor) of the LACMTA Board of Directors. The Mayor of the City of Los Angeles currently serves as the Chair of the Board. Additionally, three members represent the City of Los Angeles, five members are also members of the Los Angeles County Board of Supervisors. The remaining members include one representative from each of the cities of Lakewood, Duarte, Glendale, and Santa Monica.

Los Angeles County Metropolitan Transportation Authority (currently known as Metro) serves as transportation planner and coordinator, designer, builder and operator for Los Angeles County. More than 9.1 million people live within its 1,433-square-mile service area. Metro operates bus, BRT, light rail, and heavy rail with an annual operating budget of \$922 million for the bus system, and \$257 million for rail.

Eighty percent of Metro passengers use the bus system. The Metro bus system spans more than 185 routes and serves approximately 16,000 bus stops, including two premium BRT dedicated busways known as the Metro Orange Line and Metro Silver Line. The premium BRT, Metro Rapid and Metro Express services have attributes that may include signal priority, right-of-way,

HOV and prepay fare collection that enable these buses to operate with faster travel times than local routes. Metro's fleet of more than 2,500 Compressed Natural Gas (CNG) buses is the largest CNG fleet in the world. Systemwide, Metro Bus provides more than 7.2 million revenue service hours annually with an average of 1.1 million boardings per weekday.

The Metro Rail system consists of 275 light and heavy rail cars that operate on five lines to 70 stations across approximately 76.7 route miles in heavily congested travel corridors. Three light rail lines – Blue, Gold and Green – serve 56 stations along 60.7 miles of track with the Blue Line being one of the most heavily patronized light rail lines in the nation. The Red and Purple Lines are heavy rail that serve 16 stations along 17.4 miles of track. Metro Rail provides connections to many key multi-modal transportation hubs and accounts for 300,000 weekday boardings.

Metro is continuing to expand its bus and rail network across the region under local funding mechanisms, known as Measure R and the 30/10 Initiative. In November 2008, Los Angeles County voters approved Measure R, a half-cent sales tax. The measure is expected to generate \$40 billion for countywide transportation projects over the next 30 years. In April 2011, Metro's Board of Directors adopted the 30/10 Initiative to use the revenue from Measure R as collateral for long-term bonds and a federal loan, which will allow Metro to build 12 major transit projects in 10 years instead of the initial 30-year plan. Part of the funds from Measure R will be used to expand the following Metro rail projects throughout the region:

- Gold Line Foothill Extension to Azusa
- Exposition Line – Phase II

- Crenshaw/LAX Extension
- Regional Transit Corridor connecting the Blue, Exposition, and Gold Lines
- Purple Line Extension to Westwood
- Gold Line Eastside Extension from East Los Angeles – Phase II
- Green Line Extension to LAX
- Green Line Extension – South Bay

In addition to operating its own service, Metro funds 16 municipal bus operators and numerous local shuttle programs as well as an array of transportation projects including bikeways and pedestrian facilities, local roads and highway improvements, goods movement, Metrolink, and the Freeway Service Patrol and call boxes.

In November 2009, Metro established a Blue Ribbon Committee (BRC) represented by key stakeholders who serve as regional operators as well as beneficiaries of transit service. The BRC recommended a service concept, conveyed as a set of overarching policy statements that provides a blueprint to build a better transit system for greater regional mobility with fewer resources.

Metro decentralized its bus operations in 2002, dividing them into five localized sectors or councils. In 2010 Metro restructured and established a centralized organization, while maintaining the role and responsibility of the councils to help coordinate service changes. Metro Service Councils recommend and approve changes to bus service that may impact each respective geographical area within Metro's purview, as described below.

Metro's transit service is updated twice a year. Changes to the rail system are reviewed and approved by the Metro Board of Directors. Meanwhile, bus system change approvals are delegated to five area-based Metro Service Councils: San Fernando Valley, San Gabriel Valley, the Gateway Cities, South Bay, and Westside/Central. Each Service Council consists of up to nine representatives who are appointed by the Metro Board of Directors. The following is a brief description of the five Metro bus service areas.

South Bay

The South Bay service area is responsible for providing transit service from Norwalk (East) to LAX and the Beach Cities (West), Hollywood (North) to San Pedro (South) and Downtown Los Angeles. South Bay's East/West Service connects with the Blue Line, and the North/South service connects with the Green Line.

Westside/Central

Operating boundaries for the Westside/Central service area extend to the west as far as Malibu and to the east past downtown Los Angeles. The Westside/Central area provides service to some of the most heavily traveled lines and traverses some of the most congested streets in the Los Angeles area.

San Fernando Valley

The San Fernando Valley service area provides transportation to the cities of Agoura Hills, Calabasas, Hidden Hills, La Canada/Flintridge, Burbank, Glendale, and San Fernando, and to numerous San Fernando Valley communities within the City of Los Angeles. This sector also operates the Bus Rapid Transit Orange Line.

San Gabriel Valley

The San Gabriel Valley service area is the primary provider of bus transit service to the western San Gabriel Valley, East Los Angeles, and North Los Angeles areas. Additionally, the San Gabriel Valley service area provides regional service to the east San Gabriel Valley. Cities served in west San Gabriel Valley include Alhambra, Arcadia, El Monte, Monrovia, Montebello, Monterey Park, Pasadena, Rosemead, San Gabriel, San Marino, Sierra Madre, South El Monte, South Pasadena, and Temple City.

Gateway Cities

The Gateway Cities service area is comprised of 26 cities and unincorporated areas of southeast Los Angeles County. Cities included in the Gateway Cities service area are 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, and Whittier.

Metro accepts cash fares and weekly and monthly passes as follows:

Cash Fares/Passes		Regular	Senior/ Disabled/ Medicare*
Base Fare (Required for each boarding)		\$1.50	\$0.55
Metro-to-Muni Transfer Required for transfer to municipal lines; Not valid on Metro Bus and Metro Rail		\$0.35	\$0.10
Freeway Express Add-Ons Bus only on freeway routes	Zone 1	\$0.70	\$0.30
	Zone 2	\$1.40	\$0.60
Seniors Age 62+/Disabled Off-Peak Base Fare Weekdays 9 a.m. – 3 p.m. and 7 p.m. – 5 a.m.; All day on weekends and Federal holidays		--	\$0.25
Metro Day Pass Good for local travel until 3am the following day. May be purchased aboard buses or at Metro ticket vending machines. Zone charges may apply on some lines.		\$6.00	\$1.80
Metro Silver Line		\$2.45	\$1.15 peak \$0.85 off-peak
Weekly Pass Valid Sunday through Saturday	\$20	EZ transit pass Good for travel on Metro bus, Metro Rail and many additional carriers	\$84 per month
Monthly Pass Valid from the 1st through the end of the month	\$75	EZ Premium Stamp May only be affixed to EZ transit pass	\$22 per zone
Day Pass May be purchased in quantities of up to 8 at a time	\$6	Token Valid for base fare; sold in bags of ten for \$15	\$1.50
Freeway Express	\$22 per zone		

Stamp Bus only; maximum two zones			
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Los Angeles County contains 88 incorporated cities, covers 4,058 square miles, and had a population of 9,818,605 according to the 2010 US Census. California is the nation's most populated state and about 26 percent of the state's population lives in Los Angeles County.

A demographic profile of Metro's service area from the 2010 Census, as presented on the following table, shows that 27.8 percent of the population was White non-Hispanic, 47.7 percent Latino, 13.7 percent Asian, and 8.3 percent Black.

According to Metro's *Limited English Proficiency Outreach Plan, updated September 2007*, Latinos and Blacks used the transit service at a level that was disproportionately higher than its representation in the service area. Surveys indicated that the ethnic background of Metro's riders was 62 percent Latino, 17 percent Black, 11 percent White, seven percent Asian/Pacific Islander, and four percent Other.

According to Metro's most recent ridership surveys:

- Bus ridership accounts for 76 percent of total weekday boardings and 92 percent of bus riders are minority.
- Rail ridership accounts for 24 percent of total weekday boardings and 80 percent of rail riders are minority.

The population of Los Angeles County has changed slightly since the 2000 Census (also presented in Table 1). Key changes were:

- An overall population increase of about 299,267 persons, or 3.1 percent;
- The non-Hispanic white population comprised 27.8 percent of the total population in 2010, a proportional decrease of 3.3 percent;
- Black, American Indian, and Asian populations had slight increases/decreases (none more than 2 percent); and
- The Hispanic or Latino population increased by 3.2 percent.

Table 1 – Demographics of the LACMTA Service Area

POPULATION BY RACE: 2010

County	White alone, Non-Hispanic		Minority										Total Population
			Black/ African American		American Indian and Alaska Native		Asian and Pacific Islander		Other Race		Hispanic ¹		
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	
Los Angeles	2,728,321	27.8%	815,086	8.3%	18,886	0.2%	1,348,135	13.7%	220,288	2.2%	4,687,889	47.7%	9,818,605

POPULATION BY RACE: 2000

County	White alone, Non-Hispanic		Minority										Total Population
			Black/ African American		American Indian and Alaska Native		Asian and Pacific Islander		Other Race		Hispanic ¹		
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	
Los Angeles	2,959,614	31.1%	901,472	9.5%	25,609	0.3%	1,147,834	12.1%	242,596	2.5%	4,242,213	44.6%	9,519,338

¹ Per the 2000 and 2010 Census, people of Hispanic origin can be, and in most cases are, counted in two or more race categories.

V. SCOPE AND METHODOLOGY

Scope

The Title VI Compliance Review of Metro examined the following requirements as specified in FTA Circular 4702.1A:

1. General Reporting Requirements and Guidelines - all applicants, recipients and subrecipients shall maintain and submit the following:
 - a. Annual Title VI Certification and Assurance;
 - b. Title VI Complaint Procedures;
 - c. Record of Title VI Investigations, Complaints, and Lawsuits;
 - d. Language Access to LEP Persons;
 - e. Notice to Beneficiaries of Protection under Title VI;
 - f. Submit Title VI Program;
 - g. Environmental Justice Analysis of Construction Projects; and
 - h. Inclusive Public Participation.

2. Program-Specific Requirements and Guidelines for Large Urban Areas - all applicants, recipients and subrecipients that provide public mass transit service in areas with populations over 200,000 shall also submit the following:
 - a. Demographic Data;
 - b. Systemwide Service Standards and Policies;
 - c. Evaluation of Service and Fare Changes; and
 - d. Procedures for Monitoring Transit Service.

Methodology

Initial interviews were conducted with the FTA Headquarters Civil Rights staff and the FTA Region IX Civil Rights Officer to discuss specific Title VI issues and concerns regarding Metro. Following these discussions, an agenda letter was sent to Metro advising it of the site visit and indicating additional information that would be needed and issues that would be discussed. The Title VI Review team focused on the compliance areas that are contained in FTA Title VI Circular 4702.1A that became effective on May 13, 2007. These compliance areas are: (1) General Reporting Requirements and Guidelines, and (2) Program-specific Requirements and Guidelines for Recipients Serving Large Urbanized Areas.

The General Reporting Requirements and Guidelines now include implementation of the Environmental Justice (EJ) and Limited English Proficiency (LEP) Executive Orders.

Metro was requested to provide the following documents in advance of the site visit:

- Description of Metro's service area, including general population and other demographic information using the most recent data available.
- Current description of Metro's public transit service, including system maps, public timetables, transit service brochures, etc.
- Roster of current Metro's revenue fleet, to include acquisition date, fuel type, seating configurations and other amenities.
- Description of transit amenities maintained by Metro for its service area. Amenities include stations, shelters, benches, restrooms, telephones, passenger information systems, etc.

- Metro Organization Chart.
- Any studies or surveys conducted by Metro, its consultants or other interested parties (colleges or universities, community groups, etc.) regarding ridership, service levels and amenities, passenger satisfaction, passenger demographics or fare issues for its public transit service during the past three years.
- Summary of Metro's current efforts to seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities.
- A copy of Metro's four factor analysis of the needs of persons with limited English proficiency.
- A copy of Metro's plan for providing language assistance for persons with limited English proficiency that is based on the USDOT LEP Guidance and includes sections on *Training Staff, Providing Notice to LEP Persons and Monitoring and Updating the LEP Plan.*
- Documentation of Metro's recent efforts to determine whether new documents, programs, services, and activities need to be made accessible for LEP individuals.
- A list of any investigations, lawsuits, or complaints naming Metro that alleges discrimination on the basis of race, color, or national origin since its September 2010 Title VI Program submission. This list must include:
 - the date the investigation, lawsuit, or complaint was filed;
 - a summary of the allegation(s);
 - the status of the investigation, lawsuit, or complaint; and
 - actions taken by Metro in response to the investigation, lawsuit, or complaint.
- Copy of Metro's Notice to Beneficiaries of Protections under Title VI.
- Documentation of efforts made by Metro to notify members of the public of the protections against discrimination afforded to them by Title VI.

- Copies of any environmental justice assessments conducted for construction projects during the past three years and, if needed, a description of the program or other measures used or planned to mitigate any identified adverse impact on the minority or low-income communities.
- A copy of Metro's demographic analysis of its beneficiaries. This can include either demographic maps and charts prepared or a copy of any customer surveys conducted since the last Title VI submittal that contain demographic information on ridership, or Metro's locally developed demographic analysis of its customers' travel patterns. If submitting demographic maps and charts, provide an electronic copy of all maps and charts, and any software required for viewing the data.
- All current quantitative system-wide service standards and qualitative system-wide service policies adopted by Metro to guard against discriminatory service design or operations decisions.
- If Metro has made significant service changes or fare changes since its September 2010 Title VI Program submission or is currently planning such changes, provide documentation of Metro's Title VI evaluations of the service or fare changes.
- Documentation of periodic service monitoring activities undertaken by Metro, since its last Customer Satisfaction Survey conducted in 2009, to compare the level and quality of service provided to predominantly minority and low-income areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. If Metro's monitoring determined that prior decisions have resulted in disparate impacts, provide documentation of corrective actions taken to remedy the disparities.

Metro assembled most of the documents prior to the site visit and provided them to the Compliance Review team for advance review. A detailed schedule for the four-day site visit was developed.

The site visit to Metro occurred July 12-15, 2011. The individuals participating in the Review are listed in Section VIII of this report. An Entrance Conference was conducted at the beginning of the Compliance Review with Metro senior management staff and the contractor Review team. The Review team showed the participants a video on Title VI during the Entrance Conference. Also, during the Entrance Conference, the Review team explained the goals of the Review and the needed cooperation of staff members. A detailed schedule for conducting the on-site visit was discussed.

Following the Entrance Conference, the Compliance Review team conducted a detailed examination of documents submitted in advance of the site visit and documents provided at the site visit by Metro staff on behalf of the agency.

The Review team then met with various staff members from Metro and several community groups to discuss how Metro incorporated the FTA Title VI requirements into its public transportation system.

Transit Service Observations

With the assistance of Metro staff, the Review team identified selected Metro routes to tour and observe. The Review team observed the following service:

- Heavy rail service - Red Line
- Light-rail service - Blue and Gold Lines
- Transitway bus rapid transit (BRT) service - Orange Line
- Metro Rapid bus - routes 750 and 754
- Local bus service - routes 51, 52, 150, 204, 240, and 352

The tours of bus and rail service were intended to observe services and amenities provided on each mode in minority and low-income communities and in non-minority and non-low income communities. In general, the Review team did not observe major disparities in the types of vehicles, stations, or stop amenities where Metro maintained the stations.

The Review team did observe much heavier usage of the service and more standing loads on services in minority and low-income areas than those in the non-minority and non-low income communities. And this would be normal considering minority and low-income populations tend to be disproportionately transit dependent and use the system more frequently and more often. Also the shelters and benches that were the responsibility of the local jurisdictions were consistently and significantly better in the non-minority and non-low income communities than in the minority and low-income communities. Therefore, due to the fact that the citing and quality of these facilities is not within LACMTA's control no deficiency was found.

VI. FINDINGS AND RECOMMENDATIONS

The Title VI Compliance Review focused on Metro's compliance with the General Reporting Requirements and Guidelines and the Program-Specific Requirements and Guidelines for Recipients Serving Large Urbanized Areas. This section describes the requirements, guidance, and findings at the time of the Compliance Review site visit. In summary, deficiencies were identified in five of the 12 requirements of the Title VI Circular applicable to recipients serving large urbanized areas, as follows:

- Notice to the Public of Rights
- Language Access to LEP Persons
- System-wide Service Standards and Policies
- Evaluations of Service and Fare Changes
- Monitoring Transit Service

Advisory Comments were made in a number of areas including the area of Environmental Justice Analysis.

FINDINGS OF THE GENERAL REPORTING REQUIREMENTS

1. Inclusive Public Participation

Guidance: *FTA recipients should seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.*

Finding: During this Title VI Compliance Review of Metro, no deficiencies were found regarding Metro’s compliance with FTA guidance for Inclusive Public Participation. Prior to the site visit, Metro provided examples of public outreach to minority and low-income communities affected by the following projects:

- Congestion Reduction Demonstration Program
- Metro Silver Line
- 2009 Long Range Transit Plan
- Crenshaw/LAX Corridor
- Eastside Transit Corridor
- South Bay Metro Green Line Extension
- Regional Connector Transit Corridor
- Westside Subway Extension Corridor
- Wilshire Bus Rapid Transit
- Metro Orange Line Extension
- Exposition Metro Line Phase I

Metro’s inclusive public participation efforts varied from project to project, but in general, the following efforts were made to include minorities and low-income persons in its planning process:

- Interviews with transit riders at transit stations
- Community meetings and workshops held in neighborhoods affected by Metro projects
- Meeting notices translated as needed and posted in minority newspapers (Inglewood Today, Pace News, La Opinion, El Clasificado, Rafu Shimpo, Chinese LA Daily)
- “Take Ones” and Project “Fact Sheets” posted on transit vehicles
- Announcements and briefings to neighborhood councils, local business groups, non-governmental organizations, and churches

- Meetings held in convenient places and at convenient times (i.e. Regional Connector public outreach meeting held at the Japanese American National Museum)
- Engagement of homeless assistance and social service providers
- Early project scoping meetings
- Quarterly progress status meetings
- Community email blasts
- Elected official constituent database mailings
- Neighborhood transportation blogs
- Transportation advocates and interest groups

During the site visit, Metro’s Regional Communications Department (MRCD) confirmed it used the outreach methods listed above, the combination of which depended on the needs of the project and affected communities. In addition to posting community meeting and workshop notices in minority newspapers, the MRCD used local ethnic cable television stations to communicate public participation opportunities.

While MRCD stated during the site visit that it did not have a documented public outreach plan for the agency, it based its outreach strategy on the specific needs of each project. The MRCD attempted to identify “nuances” associated with groups (minority and low-income included) affected by the project, and tailor its strategy based on its understanding of the community’s needs and concerns, language(s) spoken, economics, and most effective way to engage community stakeholders.

MRCD reported that recent outreach efforts associated with its Regional Connector Corridor Project were a good example of how its efforts were effective in including the public in project planning and decision-making. MRCD explained that by working with a community group named the Little

Tokyo Working Group, it was able to better understand the needs and concerns of a minority community affected by the project, make changes to its plans accordingly, and cooperatively develop a design and implementation solution for the project that was agreeable to all involved.

In response to MRCD's statement that it did not have an "overall public outreach plan," the Review team noted that according to documents provided prior to the site visit, in connection with its recent Congestion Reduction Demonstration Program, in January 2009 the Metro Board of Directors approved a *Public Outreach and Communications Plan*. This plan provided a framework for conducting public outreach to include minorities and low-income persons as required by FTA Circular 4702.1A, IV.9, as follows:

The purpose of the Plan is to offer a systematic and strategic approach for reaching diverse groups of people and interests. This Plan provides a structure that allows for the scheduling, documentation and evaluation of each step of the public involvement process and engagement efforts. The concerns, issues, creative ideas and needs of community members will inform the outreach effort throughout the course of the demonstration project.

The purpose of this public outreach effort is threefold:

- (1) To provide the public multiple opportunities to review the proposed options, the implications of the options, and alternative implementation approaches for the Demonstration Project;*
- (2) To create and distribute public information packages using a multi-media approach that is user friendly and culturally sensitive to the communities affected by the program;*
- (3) To provide policy makers with information about the public's opinion about the options.*

The Plan incorporates a number of strategies aimed at encouraging community participation. These strategies include proactive engagement of business, civic and other stakeholder groups, including elected officials; regularly scheduled project open houses and community briefings that allow interested stakeholders to receive current, accurate information; maintenance of an interactive project website; regular media updates; and an ongoing presence at community events, fairs and street festivals. These forums provide multiple ways for Metro to receive input from the public.

The primary elements of Metro's *Public Outreach and Communications Plan* included:

1. Establishment of Corridor Advisory Groups (CAGs) comprised of stakeholders.
2. Collaboration with CAGs, businesses, community groups, institutional/cultural groups, employers, neighborhood councils, Local Governance and Councils of Governments, legislative representatives, technical advisory groups, and public hearing participants.
3. Use of "new media" (virtual meetings, web chats).
4. Determine how various aspects of the project impact stakeholders.
5. Identification of target audiences and development of corollary key messages consistent with project goals and objectives.
6. Develop multilingual materials as a part of the marketing plan and media/relations strategy.

The other examples Metro provided revealed that because it conducted public outreach on a project by project basis (particularly before 2009), outreach efforts were inconsistent. It was suggested that the development and implementation of Metro's *Public Outreach and Communications Plan* for all projects would provide more consistency across all projects in its approach to including minorities and low-income persons in its planning efforts. The Plan was designed to ensure that affected communities, including minority and low-income communities, had the opportunity to provide input early and often throughout the life of a project.

In addition to implementing its *Public Outreach and Communications Plan*, Metro outsourced many of its project-related public outreach efforts. During the site visit, Metro explained a process by which it issued Requests for Proposals (RFPs) for the facilitation of community participation in transit projects. Metro provided examples of RFPs for its Crenshaw-Prairie Transit Corridor Project

and Metro Eastside Phase II Project. The statements of work included in these RFPs specifically communicated Metro's requirements for satisfactory performance as it related to outreach to affected communities, placing emphasis on the need to engage the communities in a variety of ways consistent with its *Public Outreach and Communications Plan*.

Metro was advised to apply the outreach framework in its *Public Outreach and Communications Plan* associated with its Congestion Reduction Demonstration Program to all projects. In addition, it was suggested that Metro apply its *Public Outreach and Communications Plan* to the development of its short and long range transit plans. This will help to ensure that minorities and low-income persons have the opportunity to provide input into the overall planning and selection of Metro transit projects.

2. Language Access to LEP Persons

Requirement: *FTA recipients shall take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP).*

Finding: During this Title VI Compliance Review of Metro, deficiencies were found regarding Metro's compliance with FTA requirements for Language Access to LEP persons. Prior to the site visit, Metro submitted its *Limited English Proficiency Outreach Plan* (LEP Plan), updated September 2007. This LEP Plan noted that, in November 2005, Metro was rated highly among other transit agencies by the General Accounting Office of the United States in its commitment to multiple language outreach. Metro also stated in its LEP Plan

that, “The U.S. Census Bureau indicates that a language other than English is spoken in 54% of the homes in Los Angeles County...and that according to the Los Angeles Unified School District, 91 different languages are spoken by children attending their schools.” Finally, Metro indicated in its LEP Plan that it “identifies and tracks LEP requirements on a continual basis to determine needs and allocate resources accordingly.”

During the Site Visit, Metro staff indicated that the LEP Plan was created to comply with FTA and DOT guidelines, and reflected actual practices that were already in place to provide meaningful access to LEP persons. Metro’s Communications and Customer Service departments explained that they relied on feedback from the Community Relations staff and complaints, if any, to assess the effectiveness of the program.

The LEP Plan included a summary of a language needs assessment, a table of Metro Facts at a Glance, as well as an Implementation section; however, as shown below, Metro’s LEP Plan did not fully comply with FTA Circular 4702.1A, IV, 4.a and DOT Policy Guidance, as described in the following table:

Elements Required for LEP Assessment and Language Access Plan (Per FTA C. 4702.1A, IV, 4. a. and DOT Policy Guidance)		
	Included in Metro’s Plan	Notes/Comments
Part A – Four-Factor Assessment		
1. Demography – The number or proportion of LEP persons eligible to be served or likely to be encountered	No	<ul style="list-style-type: none"> • The Plan did not identify the total number or proportion of <i>LEP</i> persons in the service area. • The Plan did identify the

Elements Required for LEP Assessment and Language Access Plan (Per FTA C. 4702.1A, IV, 4. a. and DOT Policy Guidance)		
		<p>percentage of the top ten <i>Primary</i> languages spoken in Los Angeles County, including English. Russian was last on the list with 0.5% (approximately 45,000 persons) Additional languages, with 1,000 or more LEP persons were not identified. Vital documents were not identified based on the safe harbor threshold.</p>
<p>2. Frequency of Contact – the frequency with which LEP individuals come in contact with the program and/or activities</p>	No	<ul style="list-style-type: none"> • Metro’s Plan included a chart showing “Percent of Metro Boardings by Ethnicity.” The chart did not have narrative to explain the calculations, but it appeared to conclude that based on U.S. Census data, 17.3 percent of its passengers were Spanish LEP. • Metro did not track other frequency measures such as the number of customer service calls using the Spanish language option, or data such as 35 percent of its customer satisfaction surveys were returned in Spanish.
<p>3. Importance – the nature and importance of the program, activity, or service to people’s lives;</p>	No	<p>No discussion or quantification in the Plan. No focus groups were completed to assess the essential services those with limited English proficiency would need to access these vital services.</p>
<p>4. Resources – the resources available and costs</p>	No	<p>Metro stated that costs for LEP were included in individual departmental budgets. Documentation for how factors would be dealt with and their costs.</p>

During the site visit, community representatives expressed dissatisfaction with the lack of translated hand-out materials at public hearings and meetings, and with the lack of readily available schedule information in languages such as Korean.

In summary, while Metro provides a great deal of information in Spanish, it does not appear to meet LEP guidelines to provide vital information in other primary languages, such as Chinese with 3.3 percent (nearly 300,000 persons), Tagalog with 2.2 percent (200,000 persons), or Korean with 1.9 percent (170,000 persons). Also, Metro's LEP four-factor analysis was not complete and Metro had not updated its LEP Plan in four years. During the tours of Metro services, the Review team only observed signage and announcements in Spanish and English.

Corrective Actions and Schedules: Within 120 days or based on an approved FTA corrective action plan with timeframes, from the issuance of the Final Report, Metro must submit to the FTA Headquarters Office of Civil Rights:

- A complete four-factor assessment of the language needs of its service areas.
- An updated plan for providing language assistance to LEP persons developed in accordance with the 2005 U.S. DOT Guidance.

3. Title VI Complaint Procedures

Requirement: *FTA recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request.*

Finding: During this Title VI Compliance Review of METRO, no deficiencies were found regarding Metro's compliance with FTA requirements for Title VI Complaint Procedures. According to Metro's Title VI Complaint Procedures submitted with its most recent *Title VI Compliance Report for FY 2010*, complaints are filed with the Equal Employment Opportunity Programs Manager and an attempt is made to address the complaint informally through

discussions with the complainant. Internal complaints can be filed in person, via telephone, in writing with or without a complaint form, or via email sent to the Customer Relations Department. Metro provides assistance to complainants who request help filing a written complaint or filling out Metro's *Discrimination Complaint Form*.

Once a complaint investigation is completed the complainant is informed of Metro's determination and intended corrective action (if necessary). If the complainant disagrees with Metro's determination, an appeal can be filed within 20 days to the Office of the Chief Executive Officer (CEO). The CEO makes the final determination.

4. **Record of Title VI Investigations, Complaints, and Lawsuits**

Requirement: *FTA recipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipients that allege discrimination on the basis of race, color, or national origin. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint.*

Finding: During this Title VI Compliance Review of Metro, no deficiencies were found regarding Metro's compliance with FTA requirements for Record of Title VI Investigations, Complaints, and Lawsuits. Prior to the Site Visit and in its most recent *Title VI Compliance Report for FY 2010*, Metro provided its Title VI complaint log. Per FTA Circular 4702.1A, IV.3, the log contained all required elements.

Metro used the following description for the majority of the complaints listed on its log: “Complainant alleged discrimination based on [race], [national origin], or [color].” No additional information was provided, making it difficult for the Review team to determine what was actually alleged in the complaint. Metro was able to document that it maintained additional information for each of the complaints and provided requested documentation, during the site visit, providing a more detailed description of the complaint and actions taken by Metro to investigate and close complaints, as appropriate.

5. Notice to Beneficiaries of Protection Under Title VI

Requirement: *FTA recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients shall disseminate this information to the public through measures that can include but shall not be limited to a posting on its Web site.*

Finding: During this Title VI Compliance Review of Metro, deficiencies were found regarding Metro’s compliance with FTA requirements for Notice to Beneficiaries of Protection under Title VI. Prior to the site visit, Metro provided it’s Title VI Notice. This document included all of the three elements required in FTA Circular 4702.1A, IV.5 as shown on the following table:

Elements Required in Title VI Notification (Per FTA Circular 4702.1A Chapter IV Section 5.a)	Included in Metro Notice?
A statement that the agency operates programs without regard to race, color, and national origin	Yes
A description of the procedures that members of the public should follow in order to request additional information on the recipient’s nondiscrimination obligations	NO
A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient.	No

The Review team confirmed that Metro's Notice was distributed on its website, at Metro Headquarters, at Metro customer centers (Wilshire Customer Center), and on system brochures. The Review team observed the Notices at rapid and light rail stations and major bus transfer locations throughout the system during service observations. The notification didn't include all the necessary information for a complainant to file a Title VI complaint or to access information. Metro must provide an updated Notification to the public of their rights within 30 days and once Metro has completed their four factor analysis will translate this vital document into all appropriate languages.

6. Annual Title VI Certification and Assurance

Requirement: *FTA recipients shall submit its annual Title VI certification and assurance as part of its Annual Certifications and Assurances submission to FTA (in the FTA web based Transportation Electronic Award Management (TEAM) grants management system.*

Findings: During this Title VI Compliance Review of Metro, no deficiencies were found regarding Metro's compliance with FTA requirements for Annual Title VI Certification and Assurance. The FTA Civil Rights Assurance is incorporated in the Annual Certifications and Assurances submitted annually to FTA through the Transportation Electronic Award and Management (TEAM) system. Metro executed its FY 2011 Annual Certifications and Assurances in TEAM on November 20, 2010. Metro checked as applicable, *01. Certifications and Assurances required of all applicants.* This is the category where the nondiscrimination assurance is located.

7. Environmental Justice Analysis of Construction Projects

Guidance: *FTA recipients should integrate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects. (Recipients are not required to conduct environmental justice analyses of projects where NEPA documentation is not required.). In preparing documentation for a categorical exclusion (CE), recipients can meet this requirement by completing and submitting FTA's standard CE checklist, which includes a section on community disruption and environmental justice.*

Findings: During this Title VI Compliance Review of Metro, an advisory comment was issued regarding Metro's compliance with FTA guidance for Environmental Justice (EJ) Analyses of Construction Projects. During the site visit, the following four construction projects were discussed:

- Expo Phase I Environmental Impact Report/Environmental Impact Statement (EIR/EIS)
- Crenshaw-LAX Project Draft EIS/EIR
- Regional Connector Environmental Assessment (EA)
- Westside Subway Extension Draft EIS/EIR

Per FTA Circular 4702.1A, IV.8, Metro was required to include the six elements required for Environment Justice Analysis of Construction Projects in its Environmental Assessments (EAs) and Environmental Impact Statements (EISs), as follows:

- a. *A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, or a public involvement process).*
- b. *A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income population.*

- c. *A discussion of all positive effects that would affect the identified minority and low-income population, such as an improvement in transit service, mobility, or accessibility.*
- d. *A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project.*
- e. *A discussion of the remaining effects, if any, and why further mitigation is not proposed.*
- f. *For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas. Recipients and subrecipients that determine there is no basis for such a comparison should describe why that is so.*

While Metro included some combination of these elements in its EA and EIR/EIS documentation, it did not include all of them all the time. Metro is advised to include all six elements required by the Circular in its EA and EIR/EIS documentation or why an explanation as to why an element was not addressed. In addition, Metro is advised to more fully document their analysis of the benefits to, adverse impacts on, and related mitigation measures planned for minority and low-income areas to those in non-minority, non-low-income areas to determine if disparities exist and remediation is needed, particularly when a project traverses minority and non-minority and/or economically diverse corridors.

8. Submit Title VI Program

Requirement: *FTA recipients serving large urbanized areas are required to document their compliance with the general reporting requirements by submitting a Title VI Program to FTA's Regional Civil Rights Officer once every three years.*

Findings: During this Title VI Compliance Review of Metro, no deficiencies were found regarding Metro’s submission with FTA’s requirements to Submit a Title VI Program. Prior to the site visit, Metro submitted its *Title VI Compliance Report for FY 2010*, dated September 30, 2010. The following table summarizes Metro’s Title VI Program submittal with respect to the current FTA Circular 4702.1A, IV.7:

ELEMENTS REQUIRED FOR TITLE VI PROGRAM	
GENERAL REQUIREMENTS (Per FTA C. 4702.1A, IV, 7. a. (1) – (5))	In METRO’s Title VI Program Submittal?
<ul style="list-style-type: none"> • A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities. 	Yes
<ul style="list-style-type: none"> • A copy of the agency’s plan for providing language assistance for persons with limited English proficiency that was based on the DOT LEP Guidance or a copy of the agency’s alternative framework for providing language assistance. 	Yes, but deficiencies found
<ul style="list-style-type: none"> • A copy of the agency procedures for tracking and investigating Title VI complaints. 	Yes
<ul style="list-style-type: none"> • A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to the agency submitting the report, not necessarily the larger agency or department of which the entity is a part. 	Yes
<ul style="list-style-type: none"> • A copy of the agency’s notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint. 	Yes, but deficiencies found
PROGRAM-SPECIFIC REQUIREMENTS (Per FTA C. 4702.1A, V, 6. a. (1) – (4))	
<ul style="list-style-type: none"> • A copy of the agency’s demographic analysis of its beneficiaries. This should include either any demographic maps and charts prepared or a copy of any customer surveys conducted since the last report that contain demographic information on ridership, or the agency’s locally developed demographic analysis of its customer’s travel patterns. 	Yes
<ul style="list-style-type: none"> • Copies of system-wide service standards and system-wide service policies adopted by the agency since the last submission. 	Yes, but deficiencies found
<ul style="list-style-type: none"> • A copy of the equity evaluation of any significant service changes and fare changes implemented since the last report submission. 	Yes, but deficiencies found
<ul style="list-style-type: none"> • A copy of the results of either the level of service monitoring, quality of service monitoring, demographic analysis of customer surveys, or locally developed monitoring procedures conducted since the last submission. 	Yes, but deficiencies found

9. Demographic Data

Requirement: *FTA recipients serving large urbanized areas shall collect and analyze racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.*

Findings: During this Title VI Compliance Review of Metro, no deficiencies were found regarding Metro’s compliance with FTA requirements for Demographic Data. Using the options presented in FTA C. 4702.1A, V, 1.a., Metro selected Option A: Demographic and Service Profile Maps and Charts.

Metro’s maps contained all of the data elements required in Option A, as shown below:

Elements Required for Demographic Data (Per FTA C. 4702.1A, V, 1. a.)	Included in Metro’s Title VI Submittals?
(1) A base map of the agency’s service area that includes each census tract or traffic analysis zone (TAZ), major streets, etc., fixed transit facilities and major activity centers. The map should also highlight those transit facilities that were recently modernized or are scheduled for modernization in the next five years.	Yes
(2) A demographic map that plots the above information and also shades those Census tracts or TAZ where the percentage of the total minority and low-income population residing in these areas exceeds the average minority and low-income population for the service area as a whole.	Yes
(3) A chart for each Census tract or TAZ that shows the actual numbers and percentages for each minority group within the zone or tract.	Yes

Metro uses geographic information system (GIS) modeling and mapping software and technology to assist with its activities. Specifically, they use two products, ArcReader, a free product that allows one to view, explore, and print published map files designed for viewing and sharing maps that access dynamic geographic and demographic data; and ArcView, GIS software used for

visualizing, managing, creating, and analyzing geographic and demographic data.

Prior to the site visit, Metro provided its map data in electronic format and provided the Review team with the ArcReader software. The software and applicable data did not include all of the elements required in an adequate Title VI base map; however, during the site visit, Metro used a more feature-rich version of the ArcView software to display its geographic and demographic data, which did include all required Title VI elements. While the map covers a large area and it is not possible to view the required elements against the entire service area, Metro can use the tool to produce maps that can be beneficial to determine if transit services and related benefits are equitably distributed throughout the entire service area.

Los Angeles County is extremely diverse. According to Metro's website:

Residents of Los Angeles County include people from 140 countries. Los Angeles County has the largest populations of Mexicans, Armenians, Koreans, Filipinos, Salvadorans, and Guatemalans outside of their respective countries.

According to the 2010 Census, 47.7 percent of its residents are Hispanic, 13.7 percent are Asian, and 8.3 percent are Black. With ArcReader, Metro has the capability to identify the actual numbers and percentages for each minority group by TAZ or Census tract.

10. System-wide Service Standards and Policies

Requirement: *FTA recipients serving large urbanized areas shall adopt quantitative system-wide service standards necessary to guard against*

discriminatory service design or operations decisions. Recipients serving large urbanized areas shall adopt system-wide service policies necessary to guard against discriminatory service design or operations decisions. Service standards differ from service policies in that they are not based necessarily on a quantitative threshold.

Findings: During this Title VI Compliance Review of Metro, deficiencies were found regarding Metro’s compliance with FTA requirements for System-wide Service Standards and Policies. Metro did not have system-wide service standards for all of its transit service modes. Metro did not provide system-wide service policies in its *Title VI Compliance Report for FY 2010* in conformance with the Circular requirements.

FTA Circular 4702.1A describes effective practices to fulfill the service standard requirements. FTA recommends that recipients set standards for the following indicators:

Service Standards	Service Policies
▪ Vehicle Load	▪ Vehicle Assignment
▪ Distribution of Transit Amenities	▪ Transit Security
▪ Vehicle Headway	
▪ Service Availability	
▪ On-time Performance	

In its *Title VI Compliance Report for FY 2010*, Metro provided a document entitled *Transit Service Policy September 2009*. During the Review, Metro provided an updated document entitled *2011 Transit Service Policy*. This document contained the following statement about the types of transit service that Metro provided:

Metro operates six types of bus service and two types of rail service to better match the transit mode with specific passenger demand and needs.

In summary, Metro provided the following types of transit service:

- Metro Rail heavy rail (Red and Purple lines)
- Metro Rail light rail (Blue, Gold, and Green lines)
- Metro Liner BRT (Orange and Silver lines)
- Metro Rapid (Bus Route Numbers 700 to 799)
- Metro Express (Bus Route Numbers 400 to 599)
- Metro Limited Stop (Bus Route Numbers 300 to 399)
- Metro Local (Bus Route Numbers 1 to 299)
- Metro Shuttle (Bus Route Numbers 600 to 699)

The Table below shows the FTA service standards and whether Metro had quantifiable service standards for each type of service:

Mode/Standard	Vehicle Load	Distribution of Transit Amenities	Vehicle Headway	Service Availability	Service Availability Standard #2 for Bus	On-Time Performance
Metro Rail Heavy Rail	230%	No Standard	10 min maximum/peak -15 min maximum/midday and evening -20 min maximum/night -12-15 min. maximum weekends	No Standard		No Standard
Metro Rail Light Rail	175%	No Standard	-10 min maximum/peak -15 min maximum/midday and evening -20 min maximum/night -12-15 min. maximum weekends	No Standard		No Standard
Metro Liner BRT Bus	130%	No Standard	No Standard	99% of census tracts with three or more households or four or more	Stop spacing – 1+ miles	One minute early, five minutes late 80% target

Mode/Standard	Vehicle Load	Distribution of Transit Amenities	Vehicle Headway	Service Availability	Service Availability Standard #2 for Bus	On-Time Performance
				jobs/acre should be within a ¼ mile of transit		
Metro Rapid Bus	130%	n/a ²	-20 min/ peak -60 min/off-peak (also, 10 min/peak, 10-12 min/ off-peak)	Same as above for BRT Bus	Stop spacing – 0.7 mile	1 minute early 5 minutes late 80% target
Metro Express Bus	130%	n/a	No Standard	Same as above for BRT Bus	Stop spacing – 1+ miles	One minute early five minutes late 80% target
Metro Limited Stop Bus	130%	n/a	No Standard	Same as above for BRT Bus	Stop spacing – ¼ - ½ mile	Same as above
Metro Local Bus	130%	n/a	60 minutes (minimum)	Same as above for BRT Bu	Stop spacing – ¼ - ½ mile	Same as above
Metro Shuttle Bus	130%	n/a	No	Same as above for BRT Bus	Stop spacing – ¼ mile	Same as above

Metro had additional detailed service standards for bus stop spacing and for span of service. Section 4 of the *2011 Transit Service Policy* described the use of a Route Performance Index (RPI) and Service Performance Indicators for its bus services, but did not identify any comparable procedure for its rail services.

Metro also had performance standards for its bus service (Appendix G of the *2011 Transit Service Policy*) but did not have similar performance standards for its rail service.

The Table above shows that Metro did not have quantifiable service standards for all of its modes of services, as follows:

² Amenities such as shelters and benches for all bus modes, except BRT are installed and maintained by the local jurisdictions and are not the responsibility of Metro.

- No transit amenities standards for Heavy Rail, Light Rail, Metro Liner, or Metro Rapid.
- No vehicle headway standards for Express Bus, Limited Stop Bus, or Shuttle Bus.
- No service availability standards for Heavy Rail or Light Rail.
- No on-time performance standards for Heavy Rail and Light Rail.

In addition, the vehicle headway standards for rail were “recommended maximum” headways (e.g., service headways would be no more than 10 minutes during peak) and the vehicle headway standards for bus were “minimum” headways (i.e., all local bus service should operate 60 minutes or better). In its *Title VI Compliance Report for FY 2010* and during the Review, Metro did not provide written service policies for vehicle assignment and transit security. During the site visit, Metro did provide a verbal description of its current vehicle assignment policy.

Corrective Actions and Schedules: Within 30 days from the issuance of the Final Report, Metro must submit to the FTA Headquarters Office of Civil Rights a corrective action plan that will be approved by FTA describing:

- Quantifiable and consistent service standards for all modes of service operated
- Written service policies for vehicle assignment and transit security

11. Evaluation of Service and Fare Changes

Requirement: *FTA recipients shall evaluate significant system-wide service and fare changes and proposed improvements at the planning and*

programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to “major service changes” only. Recipients should have established guidelines or thresholds for what it considers a “major” change.

Findings: During this Title VI Compliance Review of Metro, deficiencies were found regarding Metro’s compliance with FTA requirements for Evaluation of Service and Fare Changes. The Metro definition of “major service change” was not consistent with the requirements of the Circular and only applied to bus service, not heavy rail or light rail service. Metro did not perform quantitative and comparative analyses in its evaluation of fare and service changes. Metro did not conduct Title VI evaluations of service changes for its “major” transit system improvement projects in the planning and programming stages.

In its *Title VI Compliance Report for FY 2010*, Metro provided the following definition of “major service change” **for bus service** as defined in Metro’s Administrative Code as one of the following:

- More than 25 percent of the transit route miles are affected;
- More than 25 percent of the transit revenue vehicle miles are affected; and
- A new transit route is proposed.

The definition of “major service change” in the more recent document entitled *2011 Transit Service Policy* was expanded somewhat but was consistent with “Major Adjustments of Transit Service” under Board Policy (Chapter 2- 50 Public Hearings of the Administrative Code), in which Federal guidelines and Metro policy require that a public hearing be held when major service changes to the bus system are considered.

The *2011 Transit Service Policy* did not address “major service change” for the Metro Rail service. The Administrative Code did not address the elimination of a transit route or fare reductions for which a Title VI equity evaluation is required by the Circular. The Administrative Code did address fare increases.

In the *2011 Transit Service Policy* document, Metro did show an understanding of the Title VI definition of “major service change” by stating (but not utilizing) the definition in Section 5.2, as follows:

Major service adjustments are generally those that constitute an aggregate change of 25 percent or more in route miles or hours when compared on a daily basis. This includes system-wide route restructuring, or adding and deleting service.

The following are the elements required for evaluation of service and fare changes:

ELEMENTS REQUIRED FOR EVALUATION OF SERVICE AND FARE CHANGES (PER FTA C. 4702.1A, V, 4.A.)	
1.	ASSESS THE EFFECTS OF THE PROPOSED FARE OR SERVICE CHANGE ON MINORITY AND LOW-INCOME POPULATIONS.
	<i>Route changes</i> – produce maps of service changes overlaid on a demographic map of the service area
	<i>Span of service</i> – Analyze available data from surveys that indicate whether minority and low-income riders are more likely to be impacted
	<i>Fare changes</i> – Analyze available data from surveys that indicate whether minority and low-income riders are more likely to be impacted
2.	ASSESS THE ALTERNATIVES AVAILABLE FOR PEOPLE AFFECTED BY THE FARE INCREASE OF MAJOR SERVICE CHANGE.
	<i>Service changes</i> – Analyze what, if any, modes of transit are available for people affected by the service expansion or reduction. Analysis should compare travel time and costs to the rider of the alternatives.
	<i>Fare changes</i> – Analyze what, if any, alternative transit modes, fare payment types or fare payment media are available for people affected by the fare change. Analysis should compare fares paid under the change with fares that would be paid through available alternatives.

<p style="text-align: center;">ELEMENTS REQUIRED FOR EVALUATION OF SERVICE AND FARE CHANGES (PER FTA C. 4702.1A, V, 4.A.)</p>
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- | |
|---|
| <p>3. DESCRIBE ACTIONS THE AGENCY PROPOSES TO MINIMIZE, MITIGATE, OR OFFSET ANY ADVERSE EFFECTS OF CHANGES ON MINORITY AND LOW-INCOME POPULATIONS.</p> |
| <p>4. DETERMINE ANY DISPROPORTIONATELY HIGH AND ADVERSE EFFECTS ON MINORITY AND LOW-INCOME RIDERS. IF ANY, DESCRIBE THAT ALTERNATIVES WOULD HAVE MORE SEVERE ADVERSE EFFECTS THAN THE PREFERRED ALTERNATIVE</p> |

The *2011 Transit Service Policy* document did contain the Metro procedure for Title VI evaluations of service changes, as follows:

All major service changes will be screened to determine if they have a disproportionate impact on minority, poor and LEP communities (target populations). The routing of those services, for which major changes are recommended, will be overlaid on top of GIS demographic information to determine if the route serves a large share of the target population(s). If it does, then the impacts of the change will be determined, and if they are significant, mitigation may be recommended, alternative services identified, and the change could be withdrawn. If the route does not serve a large share of the target populations, no further review will be required.

During the Review, Metro provided its Board of Directors Package for the June 2011 and December 2010 service changes as well as the Title VI evaluations of the service changes for those periods. Metro provided evaluations for changes to 18 routes in 2010 (61 percent identified as having a disparate adverse impact) and 16 routes in 2011(62 percent identified as having a disparate adverse impact).

In both Board packages, the service changes to Metro Rapid service were measured by the following, as described in the Board report:

- 1. Round-trip running time should be 20 percent faster than local bus times.*
- 2. Bus stop spacing should average 0.7 miles.*

3. *Rapid buses should be productive enough to justify operating every ten minutes in the peaks and 20 minutes in the base period.*
4. *Boarding per revenue hour should be at least 80 percent of the system average, which is approximately 52 boardings.*
5. *Rapid average trip length should be at least 25 percent longer than the average local line trip length.*
6. *As part of the review process, underlying local line patronage was reviewed. Where appropriate, service will be added to the local line to ensure overloads do not occur.*

The Title VI evaluations of the bus service changes for those periods included a series of maps with the affected route superimposed on a map showing census tracts that were predominately minority by Metro's definition (greater than 72 percent), LEP, or low-income. The legend of the maps of each route contained a brief report on the following:

- Description of Change – (e.g., restructure service)
- Disproportionate Adverse Impact – (yes or no)
- Alternative Service (if applicable) – (name(s) of alternative routes)
- Mitigations Incorporated (if applicable) – (brief description of mitigations)

The Title VI service change analyses did not contain any quantitative analyses or comparative analyses. There was no analysis of the cumulative effect of the service changes, given that there were both service reductions and service increases. The service change analysis that showed discrimination or a disparate impact did not show how the policy was a business necessity that was in the public's interest and that there was no other option that would result in a less discriminatory alternative. Additionally, there was insufficient information to determine what mitigation strategies were proposed to offset the disparate impact and any alternatives. During the site visit, Metro provided charts that

summarized the productivity of the Metro Rapid bus service. These charts did not contain a Title VI analysis.

Metro has several major transit service expansion projects that are in the construction phase:

Transit Improvement Project in Construction Phase	Estimated Revenue Service Timeframe ³
Exposition Line – Phase I	2011
Orange Line Extension	Summer 2012
Gold Line Foothill Extension to Azusa (construction began in 2010)	TBD

A number of other projects are in the design phase: these include:

- Exposition Line – Phase II
- Crenshaw/LAX Extension
- Regional Transit Corridor connecting the Blue, Exposition, and Gold Lines
- Purple Line Extension to Westwood
- Gold Line Eastside Extension from East Los Angeles – Phase II
- Green Line Extension to LAX
- Green Line Extension – South Bay
- Wilshire BRT

During the site visit, Metro did not provide documentation of Title VI service equity evaluations for these new transit services or any service reductions resulting from them.

In 2010 Metro implemented a fare change, as shown on the last column of the table below. Metro did not conduct a Title VI equity evaluation of the fare change in 2010. During the site visit, Metro provided an Interoffice Memo document entitled, *Review of FTA Title VI Requirements and FY 2011 Fare Structure To Be Implemented*, dated March 24, 2010, that discussed the Title VI

³ According to Metro’s website: <http://www.metro.net/projects>

impacts of that fare change. The memo essentially stated that the FY 2011 fare structure that was implemented was essentially the Adopted Fare Structure of July 1, 2009 that had been postponed. Metro provided a document entitled *Metro Los Angeles County Metropolitan Transportation Authority Title VI Assessment of Proposed and Adopted Fare Changes May/June 2007*. The document assessed two proposed fare changes as shown on the following table:

Fare Type	Adopted Fare Structure, July 1, 2007	Adopted Fare Structure, July 1, 2009	Actual Fare Structure Implemented in 2010
Cash fare	\$1.25	\$1.50	\$1.50
Day pass	\$5.00	\$6.00	\$6.00
Weekly pass	\$17.00	\$20.00	\$20.00
Monthly pass	\$62.00	\$75.00	\$75.00
EZ pass	\$70.00	\$84.00	\$84.00
Seniors/Disabled monthly	\$14.00	\$17.00	\$14.00
K-12 monthly	\$24.00	\$29.00	\$24.00
College monthly	\$36.00	\$43.00	\$36.00
Senior age	Remains at 62	Remains at 62	Remains at 62

Appendix L of the 2007 Assessment document contained a quantitative and comparative analysis of the impact of the changes in the fares on minority, non-minority, non-low income, and low income average fares. As shown on the preceding table, there were differences in the FY 2009 and FY 2011 fare change, primarily that Metro did not change the prices of monthly passes for Seniors/Disabled, K-12 or College. The Interoffice Memo contained conclusions that there were no adverse Title VI effects but did not contain an updated Title VI analysis like that in the 2007 document.

During the site visit, Metro indicated that it was implementing a temporary reduction in the Daily Pass of \$1.00 from \$6.00 to \$5.00 for one year. Metro had not performed a Title VI equity evaluation of the fare change. Metro did not conduct a fare equity analysis on BRT lines, weekly pass changes, day pass changes, and a proposed a new fare change while the Reviewers were on site.

During the Site Visit, the Reviewers discussed in detail with Metro the requirements and guidance for the Evaluation of Service and Fare Changes found in the following documents:

- FTA Circular 4702.1A,
- FTA Dear Colleague Letter of March 8, 2011 on Title VI, and
- FTA Webinar Presentation entitled *FTA Transit Service & Fare Equity Analysis Under Title VI of the Civil Rights Act – Training Overview for FTA Funding Recipients*

Corrective Actions and Schedules: Within 30 days from the issuance of the Final Report, Metro must submit to the FTA Headquarters Office of Civil Rights a corrective action plan describing how it will correct deficiencies listed below and any others discussed with FTA. The plan must be approved by FTA prior to implementation:

- A definition of major service change for Title VI analysis
- The “major service change” must include heavy rail and light rail service and not be excluded to bus service.
- A service equity analysis method for both service reductions and service enhancements.
- Title VI service change analyses containing quantitative and comparative analyses beyond GIS analysis. The analysis must assess the cumulative effect of all of the service changes, given that there were both service reductions and service increases.

- A service equity analysis of capital expansions, including both service reductions and service enhancements for rail. If the grantee finds a disparate impact, the grantee will provide a response to the legal tests.
- A description of how the service change that resulted in a disparate impact met the legal test showing it was: 1) a business necessity in the public interest, and 2) the service changes implemented were the least of the worst discriminatory alternatives. The discussion should include an in depth description of mitigation and alternatives proposed. FTA will make its determination as to whether the response is sufficient or is a violation based on regulation 49 CFR Part 21.
- Title VI service change analysis of the capital expansion projects. Analysis of capital expansions must be conducted six months prior to revenue operations.
- A Title VI fare equity analysis method.
- Title VI fare analysis on the discrepancies identified in FY 2009 and FY 2011.
- Title VI fare change analysis for the planned temporary reduction of the Daily Pass from \$6.00 to \$5.00, as well as those proposed fare changes.
- Title VI fare equity analysis of BRT line fare changes, weekly pass changes, and the proposed fare change proposed during the summer of 2011.

12. Monitoring Transit Service

Requirement: *FTA recipients shall monitor the transit service provided throughout its service area. Periodic service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. Monitoring shall be conducted at minimum once every three years. If recipient monitoring determines that prior decisions have resulted in disparate impacts, it shall take corrective action to remedy the disparities.*

Findings: During this Title VI Compliance Review of Metro, deficiencies were found regarding Metro's compliance with FTA requirements for Monitoring Transit Service. Metro did not perform a complete monitoring analysis of its

transit service in accordance with the Circular. With respect to FTA Circular 4702.1A, Metro selected Option C for Title VI monitoring in accordance with the following table:

Elements Required for Monitoring – Option C: Title VI Analysis of Customer Surveys (Per FTA C. 4702.1A, V, 5. c.)
1) For their most recent survey, recipients should compare the responses from individuals who identified themselves as members of minority groups and/or in low-income brackets, and the responses of those who identified themselves as white and/or in middle and upper-income brackets.
2) To the extent that survey data is available, recipients should determine whether the different demographic groups report significant differences in the travel time, number of transfers, and overall cost of the trip or if different demographic groups gave significantly different responses when asked to rate the quality of service, such as their satisfaction with the system, willingness to recommend transit to others, and value for fare paid.
3) If the agency concludes that different demographic groups gave significantly different responses, it should take corrective action to address the disparities.

In its most recent *Title VI Compliance Report for FY 2010*, Metro provided its transit system monitoring effort utilizing data from its FY 2009 Customer Satisfaction Survey. During the Review, Metro submitted a document entitled *Monitoring Metro Transit Service*, which was its transit system monitoring effort utilizing data from its FY 2010 Customer Satisfaction Survey. Both documents contained the statement that, “...statistically there must be at least a 3% difference in the responses of the two groups for any difference to be meaningful.”

Metro did not provide any other explanation for what it considered “*significantly different responses*” for which “*it should take corrective actions to address the disparities.*” A detailed review of the documents showed that there were several instances where there was “at least a 3% difference” in the responses of

the different groups. The “conclusions” of Metro in both surveys were as follows:

Since this was an opinion survey, not an observational one, perceived differences may not be real. Those who are more frequent and/or dependent users of the system are likely to be more critical than occasional riders. Differing perceptions may be a reflection of the extent to which users care about the system and its quality.

Metro did not identify any corrective actions it needed to take to address the disparities in the responses of the “white,” “non-white,” “transit dependent white,” and “non-transit dependent responses.” The results of Metro’s monitoring program showed 17 of the 19 questions resulted in disparate adverse responses by minority respondents than non-minorities. FTA’s Title VI Circular requires that if a grantee finds a disparate impact in a monitoring program that it must take corrective action plan.

Title VI monitoring transit service is very important for Metro to perform at least annually because Metro can and often does make significant service changes (both improvements and reductions) during “shakeups” that occur every six months and because Metro has several major transit service improvement projects that are being implemented or planned, as described in the previous section.

Corrective Actions and Schedules: Within 30 days from the issuance of the Final Report, Metro must submit to the FTA Headquarters Office of Civil Rights a corrective action plan addressing the following deficiencies, the plan must be approved by FTA prior to implementation:

- A description of the corrective actions Metro will take to address the disparities identified as “significant” in the 2010 Customer Satisfaction

Survey. The response should include how the policies were in the public's interest, resulted in less discriminatory alternatives, and any corrective actions taken. FTA will make its determination as to whether the response is sufficient or is a violation based on regulation 49 CFR Part 21.

- A process for monitoring transit service in a comprehensive and on-going manner to address the frequent service changes.

FTA transmitted the report to LACMTA on November 23, 2011. LACMTA submitted comments to FTA through a corrective action plan on Monday, December 5, 2011. It is FTA's policy to review and determine whether the corrective action items are sufficient to meet FTA's Title VI requirements throughout the process to ensure LACMTA comes into full compliance.

VII. SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

Title VI Requirements For Recipients Serving Large Urbanized Areas	Site Review Finding	Description of Deficiencies	Corrective Action(s)	Response Days/Date	Date Closed
GENERAL REQUIREMENTS					
1. Inclusive Public Participation	ND				
2. LEP Language Assistance Plan	D	The latest LEP Plan, dated 2007, does not follow LEP guidelines. Metro has not monitored or updated the plan.	All corrective actions must be approved by FTA prior to implementation. Metro must submit to the FTA Headquarters Office of Civil Rights: <ul style="list-style-type: none"> • A complete four-factor assessment of the language needs of its service areas. • An updated plan for providing language assistance to LEP persons developed in accordance with the 2005 U.S. DOT Guidance. 	120 Days	
3. Title VI Complaint Procedures	ND				
4. List of Title VI Investigations, Complaints, and Lawsuits	ND				

Title VI Requirements For Recipients Serving Large Urbanized Areas	Site Review Finding	Description of Deficiencies	Corrective Action(s)	Response Days/Date	Date Closed
5. Notice to Beneficiaries of Protection Under Title VI	D	Incomplete information in the notice to beneficiaries of protections under Title VI	All corrective actions must be approved by FTA prior to implementation. Metro must submit to FTA Headquarters Office of Civil Rights an updated notification to the public of their rights under Title VI.		
6. Annual Title VI Certification and Assurance	ND				
7. Environmental Justice Analyses of Construction Projects	AC	Comparative analysis of impacts and mitigation on minority and low-income communities and non-minority and non low-income communities should be strengthened. (e.g. Expo Line)	See report		
8. Prepare and Submit a Title VI Program	D	All deficiencies identified in this report.	Corrective actions identified in this report will fulfill the Title VI program deficiencies		
9. Demographic Data	ND				

Title VI Requirements For Recipients Serving Large Urbanized Areas	Site Review Finding	Description of Deficiencies	Corrective Action(s)	Response Days/Date	Date Closed
10. System-wide Service Standards and Policies	D	Metro does not have a complete list of quantifiable service standards for all of its modes (e.g., shuttle, express); Metro should adopt consistent standards, using a comparable metric for all modes.	All corrective action plans must be approved by FTA prior to implementation. Metro must submit to the FTA Headquarters Office of Civil Rights: <ul style="list-style-type: none"> • Quantifiable service standards for all modes of service operated • Written service policies for vehicle assignment and transit security 	30 Days	

Title VI Requirements For Recipients Serving Large Urbanized Areas	Site Review Finding	Description of Deficiencies	Corrective Action(s)	Response Days/Date	Date Closed
<p>11. Evaluation of Fare and Service Changes</p>	<p>D</p>	<ul style="list-style-type: none"> • Metro’s definition of major service change is incomplete. • Metro’s service change analysis resulted in a disparate impact but did not take corrective steps to show determine whether the discrimination was the least form of discrimination. • Metro’s service change evaluation does not contain a quantitative or comparative analysis. • Metro has not conducted service change analyses of new services such as the Expo line. • Metro is planning a temporary fare reduction of its single day pass and has not performed an equity evaluation. • All service and fare equity analysis not performed but identified earlier in the report⁴ 	<p>All corrective actions must be approved by FTA prior to implementation. Metro must submit to the FTA Headquarters Office of Civil Rights:</p> <ul style="list-style-type: none"> • A definition of major service change for Title VI analysis that includes heavy rail and light rail service. • A detailed memo describing how the service reductions that resulted in discrimination were mitigated, and how LACMTA’s proposal met the Title VI legal test. FTA will make its’ determination based on 49 CFR Part 21. • Title VI service change analyses of the service changes proposed in the June 2011 Board Package, containing quantitative and comparative analyses. The analysis must assess the cumulative effect of all of the service changes, given that there were both service reductions and service increases. • All service change analysis listed in the report, including capital expansions. • Title VI fare change analysis for the planned temporary reduction of the Daily Pass from \$6.00 to \$5.00 and all others listed in the report. 	<p>30 Days</p>	

Title VI Requirements For Recipients Serving Large Urbanized Areas	Site Review Finding	Description of Deficiencies	Corrective Action(s)	Response Days/Date	Date Closed
12. Monitoring Transit Service	D	Metro selected Option C: Surveys, as it monitoring mechanism. The analyses did not address #3 to describe corrective actions to address significant disparities in responses of different demographic groups	<p>The corrective action plan must be approved by FTA prior to implementation. Metro must submit to the FTA Headquarters Office of Civil Rights:</p> <ul style="list-style-type: none"> • A description of the corrective actions Metro will take to address the disparities identified as “significant” in the 2010 Customer Satisfaction Survey. • A process for monitoring transit service in a comprehensive and on-going manner to address the frequent service changes. 	30 Days	

ND = No Deficiencies; D = Deficiency; NA = Not Applicable; NR = Not Reviewed; AC = Advisory Comment

VIII. ATTENDEES

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