



April 24, 2019

**Re: Long Range Transportation Plan - Equity & Performance Measures**

Dear David Lor,

We, the undersigned organizations, respectfully submit the following comments and recommendations in response to the incorporation of equity and performance measures in the Long Range Transportation Plan (LRTP). We have seen research from both [local and national sources](#) that show regions with high racial inclusion and low economic disparities are healthier, more thriving, and stronger economic regions as a whole. This “Just Growth” concept demonstrates that equity is not only morally imperative, but economically strategic and sound. Past policies have both intentionally and unintentionally created the significant and geographic disparities in Los Angeles today and only intentional equitable efforts will correct them.

Our comments are based on the presentations given to the Metro Policy Advisory Council (PAC) on April 9, 2019.

1) Equity in LRTP

a) Equity Platform

**We strongly urge Metro to adopt an agency-wide definition and implementation of equity across internal divisions and applied to all policies, programs, and project development.** We continue to seek clarity on how the continuous development of the Metro Equity Platform Framework will dovetail with other Metro policies and plans, specifically LRTP and the future congestion pricing study. Similarly, we continue to seek clarity on how the identified Equity Focused Communities (EFC) will be utilized to achieve meaningful and long-term impacts to reduce disparities, access, and inequities across Greater Los Angeles.

b) Equity definition and investments

**We strongly urge Metro to meet its previously stated commitment of including a definition of equity in the LRTP.** We seek clarity for how the LRTP will achieve equity if there is not a definition to serve as a goal post for its proposed performance measures.

**We also strongly urge Metro to identify what existing and future investment decisions will be determined by a definition and implementation of equity.**

Without intentional and effective implementation of equity, our region will continue to perpetuate a status quo of unjust disparities of health, access, resources, and opportunity.

2) Equity-focused Communities (EFC)

a) Multi-pronged strategy

We support the development of EFC maps that highlight demographic characteristics of race, income, and vehicle ownership to measure inequities in access across the region. **We strongly urge Metro to develop and share a multi-pronged strategy for ameliorating inequity that looks at both geographic clusters of impacted communities as well as vulnerable households that are dispersed throughout the county** including, but not limited to, single female-headed households, mothers, seniors, youth, and people living with disabilities. It should also be noted that populations and households that are non-white, low-income, and lack vehicle ownership are also dispersed across the County. We look forward a broader equity definition that take this into account to consider investment/policy strategies that help households everywhere, in addition to using the EFC geographies.

b) Threshold recommendation

While we understand the need to apply a prioritization methodology for the Equity Platform, we also **recommend that Metro publish complete data** (e.g., not just the highest percentile tier). This data should be publicly available and would enable more strategic and responsive decision-making.

We also recommend that **Metro compare EFC proportions with other geographic-based indexes and needs-based maps of Los Angeles**, including but not limited to, the [Economic Hardship Index](#) (LACDPH), the [Healthy Places Index](#) (Public Health Alliance of Southern California), [High Injury Network](#) (HIN) (City of Los Angeles), and the County's Top 20 Collision Concentration Corridors ([Los Angeles County Vision Zero Action Plan](#)).

3) LRTP Performance Measures

a) Equity performance measures

To bolster Metro's commitment to equity, **we recommend that all LRTP goals include equity-framed measures**. In particular there is an opportunity to apply equity defined prioritization criteria to performance measures across all LRTP goals.

Further, **we recommend that Metro share with the public the process and methodology for application, weighting, and data collection** of performance measures for a transparent understanding of Metro's progress.

b) Safety performance measures

Currently the LRTP Performance Measures for safety and security only lists one measure (total crimes reported on Metro transit system). In order to fully capture the breadth of this issue and the inequities inherent to it, **we urge Metro to adopt additional performance measures that capture community safety and equitable enforcement in the LRTP performance measures for safety and security**, options include:

- i) Relative number of fines, citations, and/or arrests of non-white population and unhoused population to white and unhoused population<sup>1</sup>
- ii) Total number of racial bias, discrimination, and sexual harassment complaints against Metro enforcement system
- iii) Total number of police interactions with members of Equity Focused Communities (EFCs) compared to non-EFC populations
- iv) Total number of police use of force incidents on the Metro system, stations, and property
- v) Identify ways to capture community satisfaction with police and law enforcement activities on the Metro system, stations, and property

Thank you for your consideration of the above recommendations and for Metro's continued commitment to contributing to an equitable transportation system that facilitates safe, dignified and affordable access for all.

Sincerely,

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<sup>1</sup> These metrics were drawn from two local community-grounded research and policy documents: The People's Plan (<http://www.unidad-la.org/peoplesplan/>) and UCLA's Million Dollar Hoods Project (<https://milliondollarhoods.org/>).