



**LACMOA**

Los Angeles County  
Municipal Operators Association

**Attachment B**

Antelope Valley Transit Authority  
Arcadia Transit  
Beach Cities Transit  
Claremont Dial-a-Ride  
Commerce Municipal Bus Lines  
Culver CityBus  
Foothill Transit  
City of Gardena's GTrans

La Mirada Transit  
Long Beach Transit  
Los Angeles DOT  
Montebello Bus Lines  
Norwalk Transit System  
Santa Clarita Transit  
Santa Monica's Big Blue Bus  
Torrance Transit System

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**VIA EMAIL AND REGULAR MAIL**

August 31, 2021

**REVISED**

Stephanie N. Wiggins, Chief Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Mail Stop: 99-25-1  
Los Angeles, CA 90012-2952

Re: Fareless System Initiative Pilot

Dear Ms. Wiggins:

The Los Angeles County Municipal Operators Association (LACMOA), which collectively consists of sixteen (16) municipal agencies (Munis'), would like to take this opportunity to congratulate you on your appointment as LA Metro's CEO. We look forward to working with you on building consensus and regional collaboration between Metro and LACMOA stakeholders. Previously, LACMOA submitted a proposal to the former Metro CEO, in order to establish a collaborative effort in implementation of a Countywide Fareless System Initiative (FSI) Pilot. Since the time of our initial proposal there has been various modifications to the FSI Pilot.

Therefore, LACMOA is updating our proposal to address these modifications; notwithstanding the fact that several LACMOA agencies have already agreed to participate in Phase I of the FSI Pilot, including: 1) Commerce Municipal Bus Lines; 2) Culver CityBus; 3) Montebello Bus Lines; 4) Norwalk Transit System; and 5) Santa Monica Big Blue Bus (pending Council approval 8/24/2021); and 6) GTrans (pending Council approval October 2021). Also, Foothill Transit has only agreed to participate in the FSI Phase I Community Colleges/UPass category at this point. Therefore, LACMOA proposes the following:

- LACMOA agencies that participate in the Phase I FSI Pilot agree to utilize their formula share of the American Rescue Plan Act (ARPA) funds to mitigate any fare revenue losses associated with K-12 and Community College students. This includes reaffirmation by LA Metro that LACMOA members may maintain all existing student fare reimbursement agreements that have been established with colleges and school districts.

- LACMOA agencies that agree to participate in the Phase I FSI Pilot have the option to exclude their Commuter/Express Service (fares) from the Phase I FSI Pilot. This a very critical provision since it enhances the opportunity for inclusion of other LACMOA agencies, that currently provide some type of Commuter/Express service (i.e. Antelope Valley Transit Authority (AVTA), Foothill Transit, Long Beach Transit (LBT) and Torrance Transit), to participate in the FSI Phase I Pilot.
- LACMOA agencies that participate in the Phase I FSI Pilot agree to cost-sharing of revenues received from each school district (K-12 or Community College) based on percentage of total boardings by participating district on LA Metro and each FSI participating transit system.
- LACMOA agencies that participate in the Phase I FSI Pilot are requesting that any future Federal, State and local funds (i.e. Justice 40 Program, Freedom to Move Act, Congestion Pricing, etc.) received by LA Metro for subsidizing or supplanting fare revenue losses due to the FSI Pilot; or for sustainability of the FSI following completion of the pilot, be allocated through a formula allocation process to FSI participating agencies.
- LACMOA agencies that participate in the FSI are requesting that the Service and Fare Equity (SAFE) Analysis as required by Title VI are in accordance with FTA guidelines at that time, and should include the data from municipal transit operators throughout Los Angeles County, in order to show the countywide impacts of the pilot.

LACMOA is requesting and seeking reaffirmation that Metro will not use the FSI Pilot as a means to acquire regional funds outside of the terms and conditions that currently govern the distribution of regional transportation funds, including Formula Allocation Program (FAP) funds.

Additionally, the proposed FSI Pilot recommends a phased approach beginning with Phase I for K-12 and Community College students in August 2021 and then implementing the FSI Phase II Pilot to include low-income passengers in January 1, 2022. LACMOA agencies do not support implementation of FSI Phase II for low income riders without a viable guaranteed means to support lost farebox revenue.

LACMOA would appreciate your consideration of this proposal inasmuch as the FSI Pilot requires collaboration on both our parts to ensure equity for all transit passengers in the LA County region.

Sincerely,



James C. Parker  
LACMOA Chair

cc: LACMOA  
Access Services  
Devon Deming, Interim Deputy Exec. Officer-FSI