

Eastside Phase 2 Transit Corridor

Title VI Maintenance Storage Facility Analysis

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# 1) Executive Summary

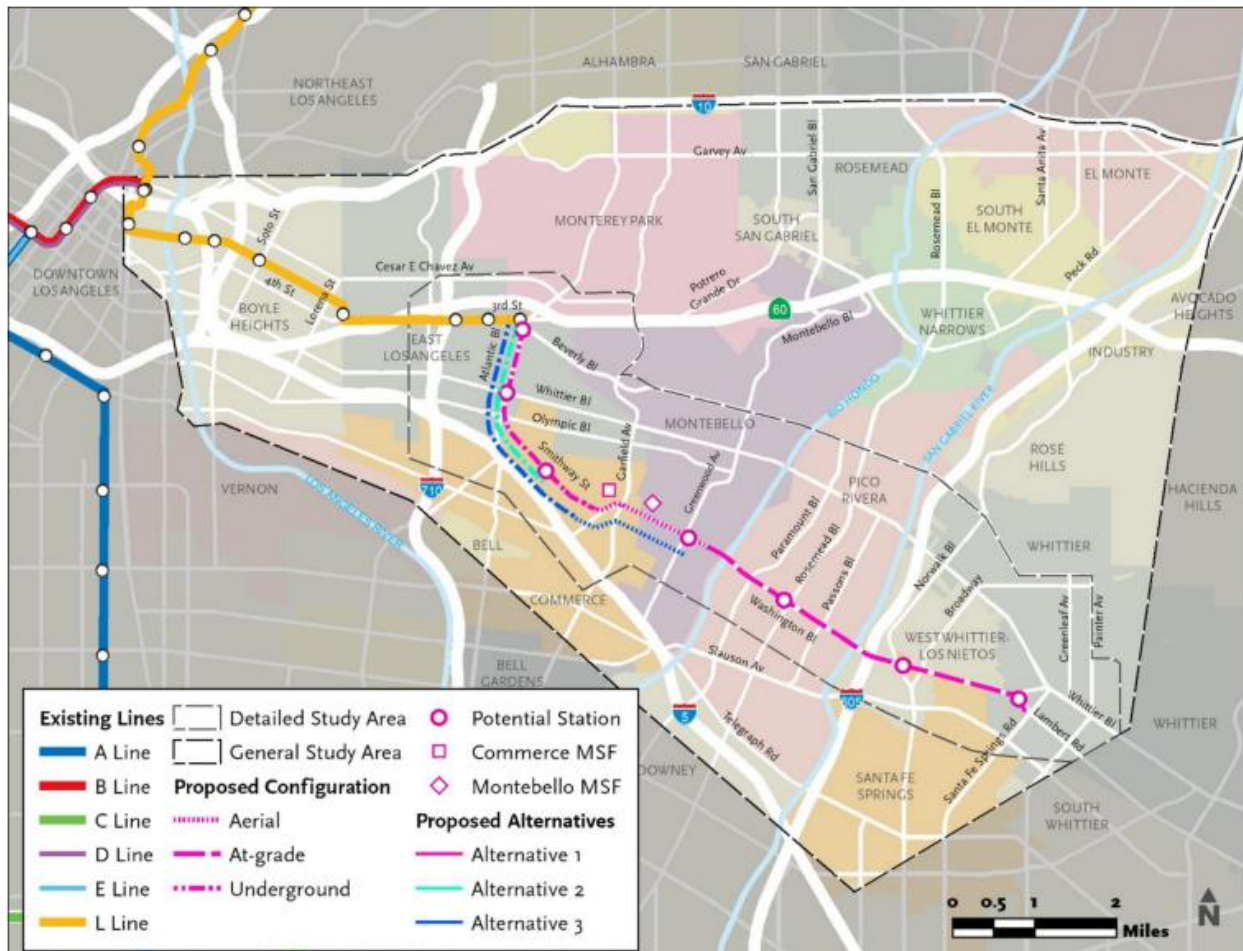
## 1.1 Overview

The Eastside Transit Corridor Phase 2 Project (Project) would extend the Metro L line, a light rail transit line, from its current terminus at the Atlantic Station in the unincorporated community of East Los Angeles to the City of Whittier within the Gateway Cities subregion of Los Angeles County. The Project would traverse densely populated, low-income, and heavily transit-dependent communities with major activity centers. The extension would extend the existing Metro L (Gold) Line approximately 3.2 to 9.0 miles and include the build out of one (1) maintenance and storage facility (MSF) site option. The alignment includes design options, depending on the Build Alternative.

As part of the Advanced Conceptual Engineering (ACE) design for the Project, numerous site concepts were proposed and developed for the (MSF). The purpose of the MSF is to serve as a base for rail operations and to conduct maintenance activities in conjunction with the Project as well as fulfilling existing regional needs

The purpose of this Title VI Equity Analysis is to ensure the MSF site options proposed by the Project are selected without regard to race, color, or national origin per Title VI of the Civil Rights Act of 1964 (42 United States Code Section 2000d) and in compliance with 49 Code of Federal Regulations (CFR) Section 21.9 (Non-Discrimination in Federally-Assisted Programs of the Department of Transportation. The Title VI Equity Analysis has been prepared to meet the requirements of the Federal Transit Administration (FTA) Circular 4702.1B and the Los Angeles Metropolitan Transportation Authority (Metro). Administrative Code Section 2-50-015.

Figure 1 -1 Project Map



## 1.2 Title VI Study Conclusions

Five MSF option sites were studied for the Washington Alternative. Three option sites were studied in the city of Commerce, one in Santa Fe Springs and a site in Montebello. All three Commerce MSF option sites had similar parcel acquisitions within the same area and had similar MSF site layouts. Commerce Option 1 had an elevated wye configuration, and that option was moved forward. The Santa Fe Springs option was withdrawn from analysis due to a new development planned and constructed. This info was provided by the city and a city coordination meeting. An MSF site option in Montebello has been further designed and included as an option that could accommodate the regional maintenance and storage needs with variations for aerial and at-grade tracks. The MSF site options evaluated in this Title VI Equity Analysis are the Commerce MSF and Montebello at grade and aerial MSF. The disparate impact for each MSF option is summarized in Table 1-1.

Table 1-1 Summary of Disparate Impacts to Minority Population and LEP Population		
Affected Area	Disparate Impact to Minority Population	Disparate Impact to LEP Population
Commerce MSF		•
Montebello MSF		•

## 2) Project Background and Purpose

### 2.1 History

In 2014 the Draft EIS/EIR studied the Santa Fe Springs and Commerce MSF options for Washington Alternative. In the 2017 Post technical Study the underground segment along Atlantic Boulevard was introduced and this expanded options for MSF site options. In 2020 the City of Montebello requested to analyze option sites in Montebello and one site was identified in coordination with City Staff. This site has an at grade and an aerial option.

### 2.2 Purpose

Metro’s Administrative Code includes Title VI requirements in Chapter 2-50-015, Determination of Site or Location of Facilities. This provision applies to, but is not limited to, storage facilities, maintenance facilities, operations centers, etc. This provision does not apply to bus shelters, transit stations, fixed guideways or ancillary facilities such as power substations. Metro is required to complete a Title VI Equity Analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The analysis, which must compare the equity of impacts of various siting alternatives, must occur before the selection of the preferred alternative.

- Title VI of the Civil Rights Act of 1964 (42 United States Code Section 2000d) states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”
- FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, requires an equity analysis to ensure that the location of a maintenance, storage, or operation facility is selected without regard to race, color, or national origin

## 2.3 Public Outreach

During the 60-day public review period, Metro held four public hearings in communities surrounding the Project in September and October 2014. A total of 528 participants attended these four meetings which also included 120 speakers providing public input and 148 participants providing written comments. Hearing one was held in Pico Rivera on September 27, 2014, hearing two was held in Montebello on September 29, 2014. Hearing three was in East Whittier on September 30, 2014 and hearing four was held in South El Monte on October 1, 2014.

During the 2017 Post Draft EIS/EIR Technical Study phase, Metro hosted ten community meetings and held a total of 110 briefings throughout the communities surrounding the Project and hosted two tours of Metro facilities and construction sites. Engagement efforts focused not only on general Project awareness, but also toward engaging the Washington Boulevard Coalition and SR-60 Coalition stakeholders as well as East Los Angeles in the unincorporated area of Los Angeles County. For the 2017 public meetings, Metro hosted five public community meetings in February 2017 in the cities of Whittier, Montebello, South El Monte, Commerce, and the unincorporated community of East Los Angeles to update the community and receive input on the 2017 Post Draft EIS/EIR Technical Study

Following the 2017 Post Draft EIS/EIR Technical Study, Metro re-initiated the CEQA and NEPA processes to further evaluate potential impacts associated with the refined Build Alternatives. In advance of the Public Scoping Meetings in Summer 2019, Metro offered a Community Update Meeting in East Los Angeles. One meeting was held in East Los Angeles Library on May 13, 2019, from 5:30 pm to 7:30 pm. The Community Update Meeting was attended by approximately 120 community members, including staff from Los Angeles County Supervisor Hilda Solis' office, community-based organization staff and members of the public.

Post scoping there were 3 community meetings in 2020 focusing on the SR60 corridor and the potential withdrawal of the SR60 alignment. There were four community meetings in 2021 taking place on the afternoon of November 15, evening of November 15, November 16 and November 17 in East Los Angeles, Montebello and Pico Rivera respectively. Additionally, there were six in person community events that occurred prior to the community meetings.

Since that time, the Project team has held several rounds of community meetings to update the public on major milestones. In June 2022, two virtual meetings held to provide updates on the release of the environmental document and to provide detailed information on the maintenance storage facility options for the public to comment. The meetings on June 27 and 29, 2022, were held prior to the release of the draft EIR that also included in person tech services locations in East Los Angeles and Whittier. There was a total of 169 participants and 98 comments at the June 2022 meetings.

In July and August of 2022, Metro held four public hearings to present key findings in the Draft EIR. Meeting in person were held at these corridor communities in East Los Angeles, Montebello, Pico Rivera and Whittier.

## 3) Methodology

### 3.1 Demographic and Socioeconomic Data

For this Title VI MSF report the Affected area is defined as the area located within a 0.25 mile around the boundaries of the MSF site. The Affected cities that are within the boundaries are the cities of Commerce and Montebello.

The data used in the report is taken from the U.S. Census Bureau and used block group level data. This data is used in the analysis for both the Affected Cities and Affected Area.

### 3.2 Definitions

The following definitions are provided from FTA Circular 4702.1B Chapter 1 and Metro's Administrative Code Section 2-50-20.

Census Block Group: A census block group consists of clusters of blocks within the same census tract. A census block group is the smallest geographical unit for which the U.S. Census Bureau publishes sample.

Disparate Impact: Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin and the policy lacks a substantial legitimate justification, including one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts to minority populations and/or minority riders. For major service changes, a disparate impact will be deemed to have occurred if the absolute difference between the percentage of minority adversely affected and the overall percentage of minorities is at least five percent (5%) per Metro's Title VI Program which was updated and approved by Metro's Board in October 2019.

Limited English Proficient (LEP) Populations: LEP populations refer to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all. Minority Persons: A minority person is one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander.

Minority Population: A minority population refers to any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed Department of Transportation (DOT) program, policy, or activity

National Origin. National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.



## 4) Regulatory Framework

### FTA's Circular 4702.1B, Chapter III, General Requirements

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part."

Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations: The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts. If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

### Metro's Administrative Code, Chapter 2-50, Title VI Requirements and Public Hearings

Metro's Administrative Code includes Title VI requirements. Chapter 2-50-005, Major Services Changes, of Metro's Administrative Code states that "all major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the Board of Directors for their consideration and then forwarded to the FTA with a record of the action taken by the Board." As such, the Eastside Phase 2 Transit Corridor Project is classified as a major service change due to it falling under category 1 of Metro's Administration Code 2-50-005(B)(1) which states "A revision to an existing transit route that increases or decreases the route miles by 25% or the revenue service miles operated by the

lesser of 25%, or by 250,000 annual revenue service miles at one time or cumulatively in any period within 36 consecutive months.”

## 5) Affected environment/existing conditions

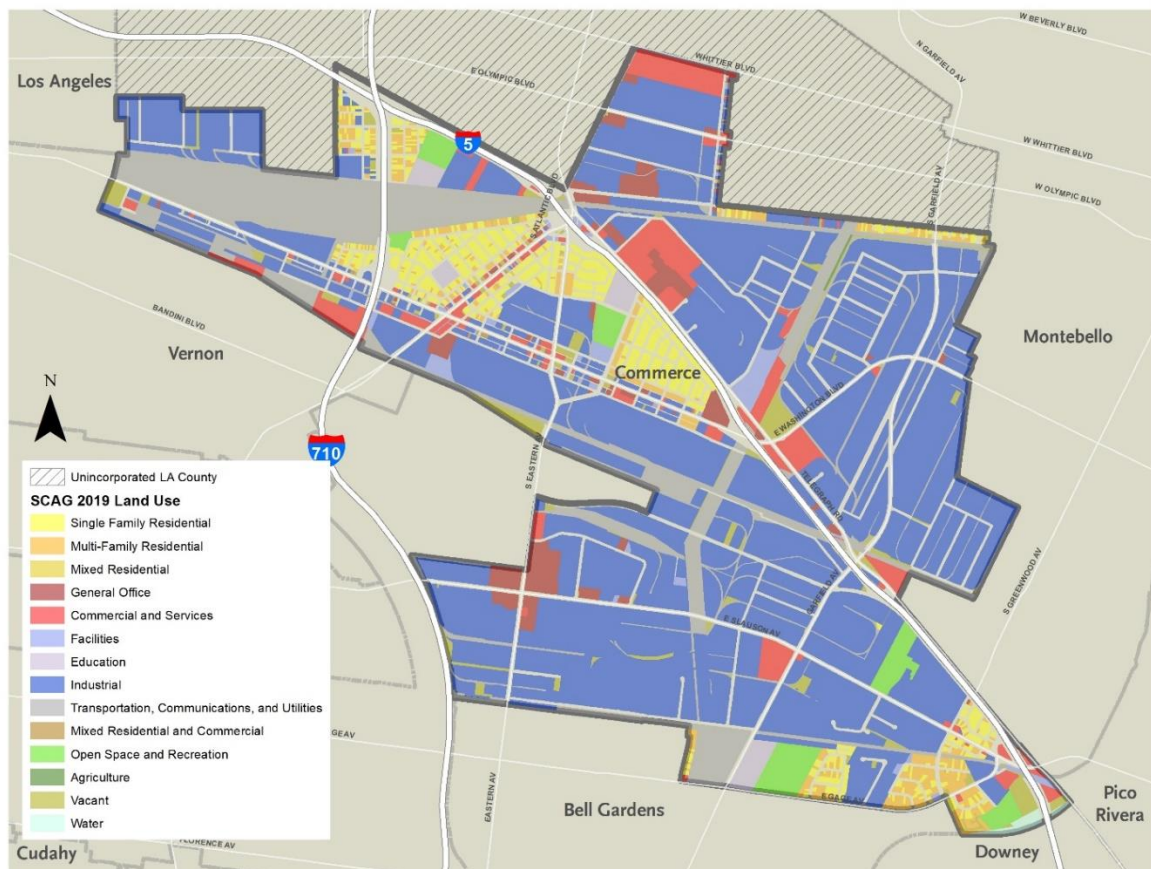
### 5.1 Affected Cities

The “Affected Area” is defined as areas within a 0.25 mile around the boundaries of the MSF site options. “Affected Cities” are those jurisdictions within the proposed MSF site options. For this Project the MSF site options are located in cities of Commerce and Montebello.

### 5.2 City of Commerce

The City of Commerce, incorporated in 1960 encompasses approximately 6.6 miles. and is generally bounded by the cities of Los Angeles, Vernon, Montebello and Maywood. The MSF site is within a primarily existing industrial area of which a number of warehouse properties are served by Burlington Northern Santa Fe Railroad (BNSF). The majority of this site is commercial and light industrial and warehousing.

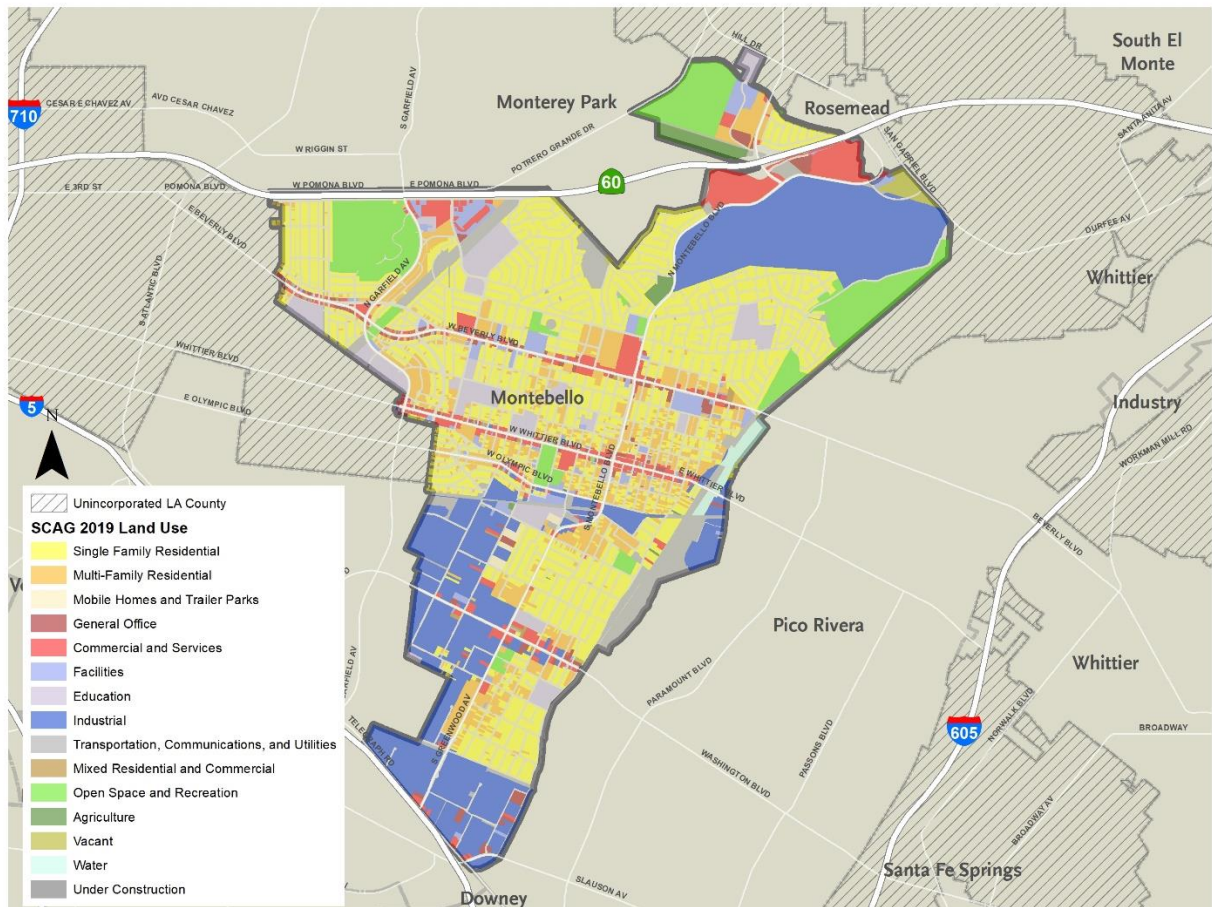
Figure 5-1. Land Use Map of the City of Commerce



### 5.3 City Of Montebello

The City of Montebello, incorporated in 1920 encompasses approximately 8.45 miles. Montebello is generally bounded by the cities of Monterey Park, Commerce, Pico Rivera and Los Angeles. The City of Commerce has a residential population of 64,353. The MSF site is primarily composed of a commercial and industrial area.

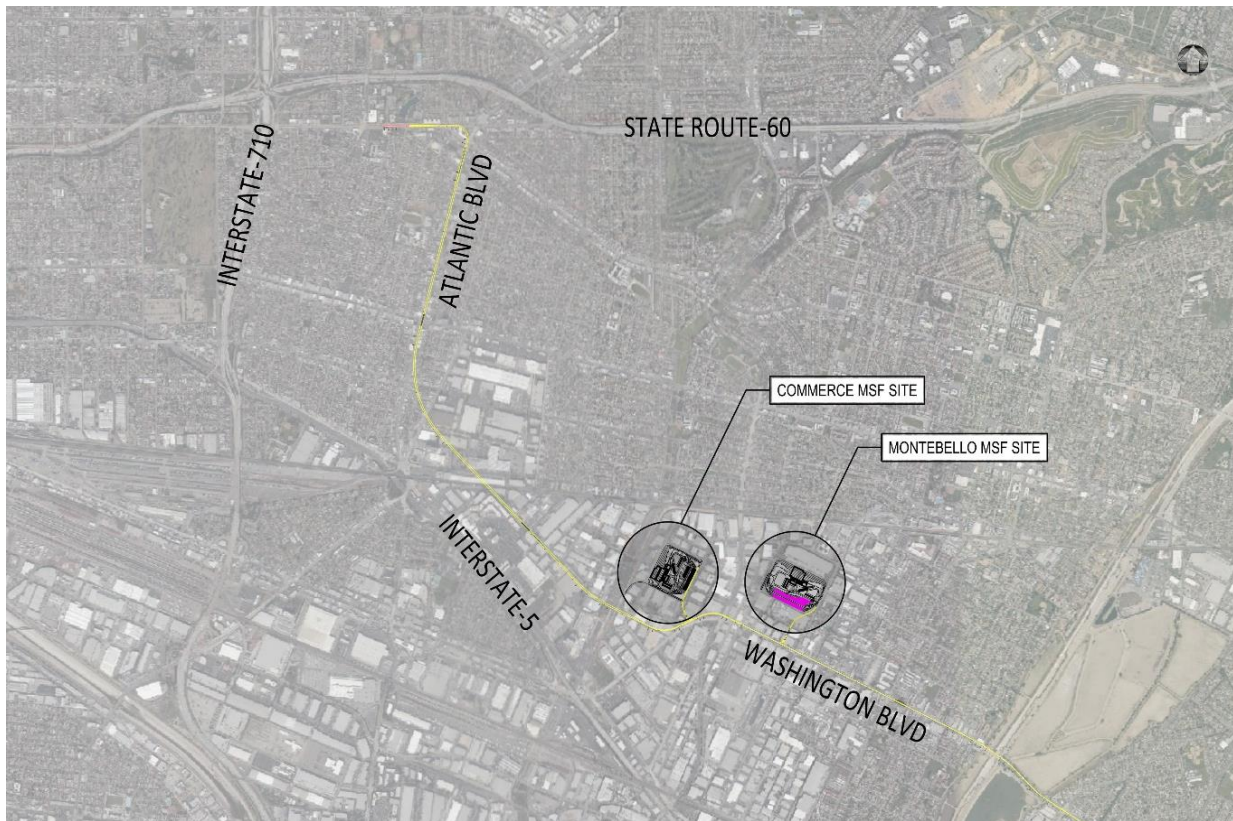
Figure 5-2. Land Use Map of the City of Montebello



## 5.4 MSF Site Options

In general, an MSF site is approximately 20 to 25 acres in size which is typical for a dedicated storage capacity of 80 to 100 light rail vehicles. The Commerce and Montebello sites can both accommodate 100 cars with increased capacity at the Montebello site for up to 120 cars. This acreage does not include the right-of-way for bringing in the yard lead tracks from the main line to the MSF facility.

**Figure 5-3 Overview Map of MSF Candidate Sites on Washington Alternative**



## 5.5 City of Commerce Site

This site is approximately 24.4 acres in area with an additional 7 acres for the yard leads and is located in the City of Commerce. The acreage is related to the parcel sizes and acquisitions, as the yard leads themselves will occupy approximately 2 acres to accommodate the lead track connections. The site is bounded by Gayhart Street on the southwest, Davis Avenue and Washington Boulevard to the east, Fleet Street to the north and Saybrook Avenue to the west. The majority of the nearby parcels are commercial or light industrial uses on all sides of the property. There are no residential homes located near the site. The closest residences are located over 100 feet away from the site. The site is within a primarily existing industrial area of which a number of warehouse properties are served by Burlington Northern Santa Fe Railroad (BNSF). The majority of this site is developed and occupied by commercial and light industrial and warehousing.

**Figure 5-4 - Commerce MSF Site**

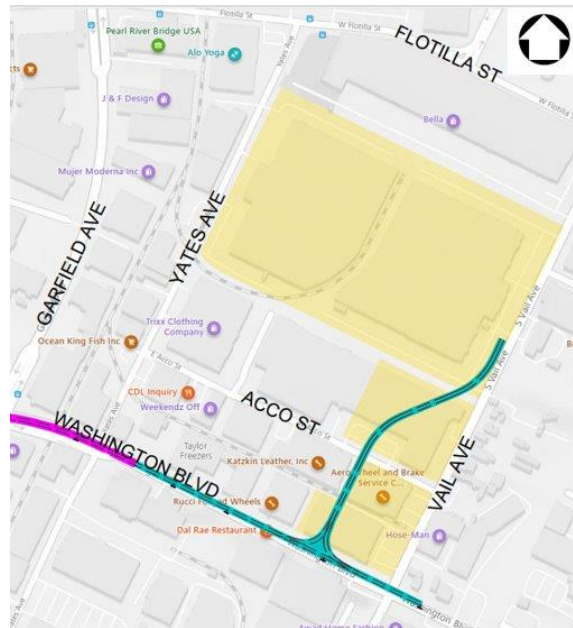


## **5.6 City of Montebello Site**

### **5.6.1 Aerial Wye Option**

Two options have been evaluated for the yard lead tracks and is dependent on the main line configuration remaining aerial from Garfield Avenue to Montebello Blvd with an aerial station at Greenwood Blvd or descending to grade with an at-grade station at Greenwood. This site is approximately 31 acres in area with an additional 9 acres for the yard leads and is located in the City of Montebello. The acreage is related to the parcel sizes and acquisitions, as the yard leads themselves will occupy approximately 2 acres to accommodate the lead track connection. The site is bounded by Flotilla Street on the north, Washington Boulevard on the south, Yates Avenue on the west, and Vail Avenue to the east. An aerial wye may be operationally preferred and would not require at-grade train movements across Washington or require the closure of Acco Street. Both options are feasible. The majority of the nearby parcels are commercial or light industrial uses on all sides of the property. There are no residential homes located near the site. The closest residences are located 1,000 feet from the site.

**Figure 5-4 – Montebello MSF Option**



### **5.6.2 At-grade Wye Option**

This site is approximately 31 acres in area with an additional 9 acres for the yard leads and is located in the City of Montebello. The acreage is related to the parcel sizes and acquisitions, as the yard leads themselves will occupy approximately 2 acres to accommodate the lead track connection. With an at-grade wye, the main tracks are tangent at-grade and provide space in the median for placement of single No. 10 crossovers on either side of the MSF yard lead track connections that cross the eastbound lanes of Washington Boulevard. Yard lead track vehicle movements from the main tracks across the eastbound traffic lanes into the yard will be via traffic signals. Provisions for railroad crossing gates will be evaluated. An at-grade wye will require Acco Street a local street, which is north of Washington Blvd, to be discontinued with cul-del-sacs on both sides of the yard lead tracks.

## 6) Demographic and Socioeconomic Characteristics of the Affected Area

The data used in this study is demographic and socioeconomic from the US Census Bureau, ACS 5 Year estimates for the Affected Cities of Commerce and Montebello and their respective Affected Areas.

### 6.1 Minority Population

Table 6-1 presents the total population and minority share for the population for LA county and for each of the Affected Cities.

Jurisdiction	Total Population	Total Minority Population	Minority Share of the Population
LA County	10,014,009	7,428,740	73.4%
Commerce	12,378	12,085	98%
Montebello	62,640	58,180	93%

Table 6-2 presents population and minority share of the total population of the Affected Area for each MSF site option. The Commerce MSF has a smaller total population than the Montebello MSF. Both sites have a similar minority share of the population with Commerce having a higher minority percent share 49.8% and Montebello having a slightly lower minority percent share 49.6%.

Affected Area	Total Population	Total Minority Population	Minority Share of the total population
Commerce MSF	1453	723	49.8%
Montebello MSF	3335	1,653	49.6%

### 6.2 Limited English Proficiency

Table 6-3 shows the share of residents with LEP populations in the Affected Cities. Spanish is the most common language spoken for each community. Montebello does have a percentage of the LEP population with other Indo-European language and 3% Asian/Pacific language while Commerce has 0% for both.

Jurisdiction	Any LEP Language	Spanish	Other Indo-European Language	Asian/Pacific Island Language
LA County	13%	9%	1%	3%
Commerce	20%	20%	0%	0%
Montebello	16%	13%	<1%	3%

Table 6-4 shows the share of residents with LEP populations in the Affected Area. For both sites Spanish is the most common other language spoken for each community. The Affected areas have a higher

percent of LEP populations compared to LA County at 13%. The Commerce MSF has a higher percentage of Spanish speakers than the Montebello MSF with 73.3%.

Affected Area	Any LEP Language	Spanish	Other Indo-European Language	Asian/Pacific Island Language
Commerce MSF	73.3%	73.3%	0.0%	0.0%
Montebello MSF	66.4%	66.4%	0.0%	0.0%

### 6.3 Minority Owned Businesses

Table 6-5 shows the impacted businesses within the MSF sites. There are 18 impacted business in the Commerce MSF and 8 in the Montebello MSF. The analysis to determine if these businesses are identified as minority owned will take place during the National Environmental Policy Act (NEPA) process. The same process will be done for the impacted business that are adjacent to the MSF sites shown in table 6-6. A minority-owned business is defined as a business with 51 percent or more of its stock or equity being owned, operated, and controlled on a daily basis by one or more (in combination) American citizens of the following ethnic minorities: Black, Asian/Asian Pacific Islander, Hispanic, and Native American. There will be no residential property acquisitions for this Project and the areas of both the Commerce and Montebello MSF are primarily commercial and industrial.

MSF Site Option	Impacted On-Site Jobs	Total Impacted Businesses	Identified Minority-Owned Businesses	Unknown Minority-Owned Status	Percent Share of Minority-Owned Business
Commerce	1,983	18	N/A	18	N/A
Montebello	1,038	8	N/A	8	N/A

MSF Site Option	Impacted Off-Site Jobs	Total Impacted Adjacent Businesses	Identified Minority-Owned Businesses	Unknown Minority-Owned Status	Percent Share of Minority-Owned Business
Commerce MSF	518	21	N/A	21	N/A
Montebello MSF	708	28	N/A	28	N/A



## 7) Assessment and Conclusion

### 7.1 Disparate Impact Assessment

A disparate impact refers to a valid neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color, or national origin. A disparate impact will be deemed to have occurred if the absolute difference between the percentage of the minority population within the Affected Area and the overall percentage of the minority population in LA County is at least 5 percent, or if there is a 20 percent or greater difference between the percentages of these two groups.

### 7.2 Minority Population

Affected Area	Percent Minority Population	Absolute Difference	At Least 5% Absolute Difference	Relative Difference	20% or Greater Relative Difference
LA County	73.4%				
Commerce MSF	49.8%	-23.6%	No	-47.39%	No
Montebello MSF	49.6%	-23.8%	No	-47.98%	No

Table Notes:

a Minority status is defined by race/ethnicity categories of individuals self-identifying as Hispanic and non-Hispanic African American, Asian and Pacific Islanders, Two or More Races, or Other Non-White race categories.

b A disparate impact will be deemed to have occurred if the absolute difference between the percentage of the minority population adversely affected by the MSF and the overall percentage of the minority population in Los Angeles County is at least 5%, or if there is a 20% or greater difference between the percentages of these two groups.

c The Relative Difference is the Absolute Difference divided by the Percent Minority Employees/Business owners for each MSF option.

### 7.3 Limited English Proficiency Population

Affected Area	LEP Population	Absolute Difference	At Least 5% Absolute Difference	Relative Difference	20% or Greater Relative Difference
LA County	13%				
Commerce MSF	73.3%	60.3%	Yes	82.25%	Yes
Montebello MSF	66.4%	53.4%	Yes	80.43%	Yes

## 7.4 Mitigation Measures

The Commerce and Montebello sites both have land uses that are compatible for a MSF site. The majority of the nearby parcels are commercial or light industrial uses on all sides of the properties. The cities of Montebello and Commerce have given input on the locations of the MSFs. Community meetings were held in June 2022 to receive feedback and to share information with the public about the location of the MSF site options.

There are no residential displacements anywhere in the project area. Under CEQA, the owners of the private property have state constitutional guarantees through the California Relocation ACT. Under this ACT, Metro would provide relocation assistance and benefits private property owners that are impacted by the project. During the upcoming NEPA process, displacement and relocation will be evaluated. If this assessment results in a mitigation, then the project will need to comply with the Uniform Relocation Act.

## 7.5 Conclusions

The cities where the MSF sites are located are comprised of primarily minority populations with the city of Montebello at 93% and the City of Commerce at 98% compared to LA County at 73.4%. The area of the MSF sites has lower minority populations than the cities where they are located with Montebello MSF at 49.8% and Commerce MSF at 49.6%. Table 7-3 summarizes the disparate impacts to the affected areas. Neither the Commerce MSF or the Montebello MSF has a disparate impact with the absolute and relative differences both being negative numbers that are below the thresholds of the absolute and relative difference. The Commerce MSF and Montebello MSF sites would both have a disparate impact to LEP populations. The Commerce site has the larger absolute difference at 60.3% and the Montebello site at 53.4%. The MSF sites were determined based on community and city input, operational and engineering compatibility and minimizing environmental impacts.

<b>Table 7-3 Summary of Disparate Impacts to Minority Population and LEP Population</b>		
<b>Affected Area</b>	<b>Disparate Impact to Minority Population</b>	<b>Disparate Impact to LEP Population</b>
<b>Commerce MSF</b>		•
<b>Montebello MSF</b>		•

## **8 References**

Los Angeles County Metropolitan Transportation Authority (Metro). Administrative Code, Chapter 2-50, 2-50-015.

Los Angeles County Metropolitan Transportation Authority (Metro). Title VI Program Update. October 2019.

Los Angeles County Metropolitan Transportation Authority (Metro). Eastside Transit Corridor Phase 2 Final Maintenance and Storage Facility Feasibility Report

U.S. Department of Transportation, Federal Transit Administration (FTA). 2012. Circular FTA C 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

American Community Survey (ACS) 2016-2020 Data

2019 Annual Land Use - SCAG