



Board Report

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REVISED
REGULAR BOARD MEETING
JUNE 27, 2024

SUBJECT: TRANSIT COMMUNITY PUBLIC SAFETY DEPARTMENT IMPLEMENTATION PLAN

ACTION: APPROVE RECOMMENDATION

RECOMMENDATION

CONSIDER:

- A. RECEIVING AND FILING the Transit Community Public Safety Department Implementation Plan (Attachment A); and
- B. APPROVING the establishment of an in-house Transit Community Public Safety Department over a five-year phased transition, utilizing the Enhanced Public Safety Service Model.

ISSUE

At its June 2023 meeting, the Board of Directors (Board) approved Motion #21.1 by Directors Najarian, Sandoval, Butts, Barger, and Bass, directing the Chief Executive Officer (CEO) to prepare a comprehensive Transit Community Public Safety Implementation Plan (Plan) for Board consideration (Attachment B). The Board requested that the Plan identify and outline a strategy to establish an in-house Metro Public Safety Department specializing in a transit environment and promoting an engaged, visible presence. The Plan reflects that an in-house Public Safety Department would complement Metro’s existing, multi-layered safety and security approach, consisting currently of transit security officers, ambassadors, and homeless outreach.

BACKGROUND

Metro’s overarching priority is the safety and the perception of safety on the transit system for riders and employees. In the 2022 Metro Customer Experience Survey, riders expressed concern about their safety at bus stops, train stations, and on buses and trains, especially at night. Of the 40 service factors evaluated by Metro riders, customers consistently ranked safety-related issues as *most needing significant improvement*, including:

- Presence of security staff on buses and trains
- Enforcement of Metro rules on trains and buses

- Personal security on Metro trains and buses at night
- Personal security at Metro train stations and bus stops at night and
- How well Metro addresses homelessness on buses and trains.

Metro has sought to operationalize a holistic, equitable, and multi-layered approach to improving public safety by deploying a combination of law enforcement officials, transit and contracted security officers, ambassadors, and outreach specialists to accomplish the following:

- 1) **Community Safety and Well-Being** - Provide a visible presence, assistance, guidance, and support to individuals.
- 2) **Prevention and Support** - Provide care-based responses to social issues related to individuals experiencing homelessness, untreated mental health, and addiction issues.
- 3) **Risk Intervention** - Maintain a safe and secure environment, protect people and property, and deter criminal activity through visible presence.
- 4) **Response and Enforcement** - Facilitate swift and effective responses to safety and security incidents and criminal activity.

Metro's ability to achieve these objectives has been hindered due to the following challenges with Metro's current contract model, which outsources law enforcement to multiple agencies:

- With limited influence on how law enforcement personnel are deployed and the methods they use, the agency lacks effective mechanisms to ensure systemwide alignment and operational control between the multiple layers of service on the Metro system.
- Contract law enforcement agencies have inconsistently adapted their policies and procedures to directives from Metro, and each of them has different methods and approaches to public safety on the Metro system.
- The escalating costs of Metro's contracts with its three law enforcement agencies strain Metro's operating budget for system safety and security, with little to no control by Metro.

In March 2023, the Board directed staff to explore the feasibility of creating an in-house Metro Transit Community Public Safety Department (TCPSPD). Bringing law enforcement services in-house would be consistent with the structure of six of the country's 10 largest transit agencies. In June 2023, the board received and filed the feasibility study and directed the development of an implementation plan for their consideration.

In January 2024, staff provided a status update on the development of the Plan, identifying that the final Plan was to include an operational framework, an organizational structure (including strategies for recruitment and a comprehensive staffing approach), and an officer training plan tailored to meet the complexities of safety and security issues in a transit environment, as well as the agency's holistic, equitable, and multi-layered approach to system safety and security.

DISCUSSION

Metro engaged a team of consultants with expertise in public safety, law enforcement services, and deployment in transit settings to develop and draft the Plan. The emerging themes from their

research and interviews emphasized the need to focus on Metro 1) directly overseeing all aspects of public safety services, 2) ensuring those providing public safety services on the system were properly trained and embodied the values of the agency, and 3) integrating social work and mental health principles into the service delivery model to enhance community engagement and address underlying societal issues.

The following implementation priorities were also deemed critical: a cohesive transition, human capital, and development strategy operationalizing effective deployment strategies that reflect a transit public safety culture and planning for the department's long-term needs.

Goals and Objectives

The vision for the TCPSPD is to “provide consistent and responsive safety services, enhancing the overall experience and well-being of transit users through a visible and engaged public safety ecosystem.” This directly aligns with Metro’s Safety Mission and Value Statements, which emphasizes a culture of care through a visible and engaged public safety department, ensuring that every trip is safe, positive, and dignified.

This vision will be implemented through adherence to the following objectives:

- **Prioritizing engaged visibility** to ensure law enforcement is visible on the system and proactively engaging and building relationships with the riding community while still being able to respond to calls for service as needed.
- **Establishing a transit public safety culture** through intentional effort and direct control and oversight over every aspect of the safety and security program.
- **Fostering a culture of care and compassion** within law enforcement efforts by encouraging officers to prioritize empathy and understanding in their interactions with riders.
- **Promoting transparency and accountability** for daily activities and overall performance.

These objectives will most effectively be accomplished by shaping the recruitment and selection process to ensure the hiring of employees who are aligned with Metro’s mission and values, including Metro’s Public Safety Mission and Values Statements, establishing required training and performance expectations, and implementing disciplinary processes in alignment with Metro’s goals.

Officer Training Plan

The POST certification establishes the foundation for law enforcement officers' basic skills and knowledge in California. However, transit-specific training is also crucial for Metro’s TCPSPD. Under the existing multi-agency law enforcement model, each law enforcement officer must complete minimal (four hours) transit-focused training before reporting for patrol on Metro.

Alternatively, TCPSPD will require all new recruits and personnel to undergo extensive and intensive (four weeks) transit-specific field-based training prior to attending the academy and as part of regular re-certification. Staff will collaborate with training academies and educational institutions to develop courses and training modules.

Zone-Based Deployment

The TCPSPD will utilize a zone-based deployment model, an industry-proven method of deployment that increases visibility while reducing overall calls for service through the appropriate presence of

officers, to optimize public safety resource allocation.

The existing deployment model for current law enforcement contractors' coverage is based on jurisdictional boundaries, and there is limited foot patrol. The deployment model of police personnel is de-centralized and reactive, focusing on hot spots as they occur. The zone-based model divides the Metro system into dedicated zones and geographical areas where officers are assigned to the same zone daily, allowing officers to become more familiar with riders and understand the unique community needs within their assigned zones. This model is expected to provide better coverage and response times to calls for service.

In November 2023, Metro began using the proposed six zones for Metro transit security deployment as a pilot, and thus far, it has provided the following benefits:

- It is easy to identify where supervisors are deployed.
- It minimizes supervisor response time when requested in support of the Transit Security Officers.
- It has increased Transit Security Officers' confidence by knowing that a supervisor or their fellow officer and supervisor is close by and ready to respond to their needs.

The anticipated allocation of personnel across the six zones within this deployment model has slight staffing variations across zones, based on an analysis of factors such as line complexity, station density, and the presence of major transit hubs. This is to meet the diverse safety needs and challenges across different zones within the system.

Bus Riding Teams

Currently, Metro has four Metro Transit Officer Bus-riding Teams, which provide a high-visibility uniformed presence on Metro buses, enforce Code of Conduct violations and fare evasion, and engage with bus operators to learn of other areas of the designated bus line where operators are having recurring issues. Three Transit Security Officers (TSO) comprise a Bus-riding Team: two TSO I and one TSO II. Metro does not currently pair TSOs with law enforcement for bus-riding teams based on deployment challenges with Metro's contracted law enforcement partners.

With approximately 80% of Metro customers relying on buses for their daily commute, additional dedicated teams are needed to provide a proactive and visible presence, deter criminal activity, and promote a sense of security for all riders. With TCPSPD, it would be recommended to have in-house sworn officers dedicated to support and supplement the TSO teams with back-up requests, arrests, and criminal activity, duties beyond the TSOs authority. The current lack of police support, which results in extended response time for backup requests or arrest requests, is an ongoing challenge for the BRTs that can be eliminated with the creation of the TCPSPD.

Service Levels

The Plan outlines four potential service models for the TCPSPD: Current, Enhanced, Decreased Sworn Officers, and Increased Sworn Officers Models.

Service Model 1 - Current: This model would have the same number of officers deployed daily as the contract law enforcement services currently provide today of 386. By maintaining the same daily

deployment headcount, this model provides a like-for-like comparison with the current multi-agency contract law enforcement model. Service Model 1 maintains the existing level of average daily deployment of sworn officers in the field with the same current level of public safety ecosystem layers (TSOs, Homeless Outreach, and Ambassadors), a replication of existing services. However, using a zone deployment model with all resources actively on the system, the current headcount would yield more engaged visible presence.

The Service Model 1, for the same number of daily deployed sworn personnel, is estimated to cost **\$154,440,303 per year** vs. \$194,051,691 (Multi-Agency Contract Cost).

Service Model 2 -Enhanced: This model builds upon Service Model 1 by retaining the current daily zone deployment of 386 sworn personnel and increasing the daily deployment of non-law enforcement unarmed alternatives by 227 from 446 to 673, recognizing that the majority of safety concerns on the system are related to quality-of-life issues. This model adds to the number of daily deployments of the other safety layers, Ambassadors, Crisis Interventionists/Clinicians, and Homeless Outreach to create a more robust security framework. Each layer plays a vital role in maintaining a safe and secure system. It also allocates \$5 million for innovative Public Safety Infrastructure Improvements at transit stations, aiming to enhance security measures and create safer environments for riders through state-of-the-art technology and strategic design upgrades.

The Service Model 2, for the same number of daily deployed sworn personnel and increased layer deployment, is estimated to cost **\$192,566,505** per year vs. \$194,051,691 (Multi-Agency Contract Cost).

Service Model 3 -Decreased Sworn Officers: This service model reduces the number of officers from the baseline of daily deployed sworn officers of 386 by 40, or 12% to 346. With TCPSD, officers will be actively on the system, on foot patrols, and riding transit. The public will notice the increased presence more significantly than in the current multi-agency model, where officers are not as visibly active on the system. Although there are fewer officers overall, the increased visibility through zones and foot patrols will still create a stronger sense of security and presence. All components outlined in Service Model 2, including Ambassadors, Homeless Outreach, and Crisis Interventionists/Clinicians and \$5 million for innovative Public Safety Infrastructure Improvements, are carried forward.

The Service Model 3, with a decrease of daily deployed sworn personnel but the same enhanced layers, is estimated to cost **\$181,510,775** per year vs. \$194,051,691 (Multi-Agency Contract Cost).

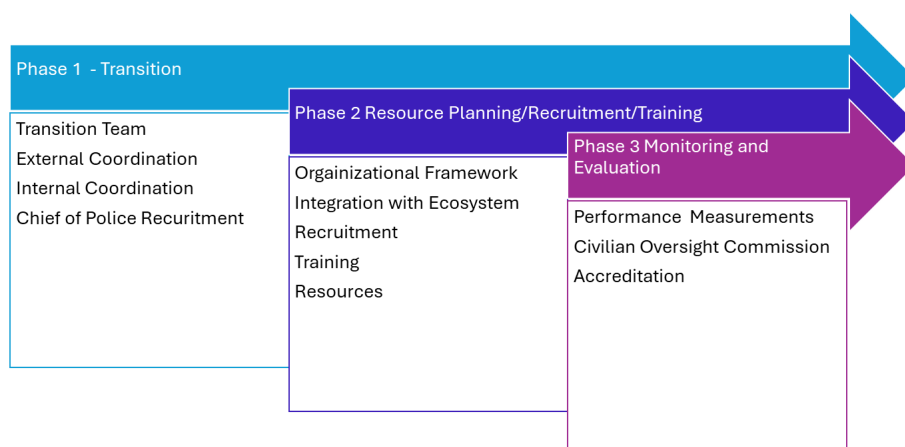
Service Model 4 -Increased Sworn Officers: This Model builds upon Service Model 2, by augmenting the daily deployment of sworn officers. All components outlined in Service Model 2, including Ambassadors, Homeless Outreach, and Crisis Interventionists and \$5 million for innovative Public Safety Infrastructure Improvements, are carried forward. In addition to maintaining these crucial roles, Service Model 3 further bolsters TCPSD by proposing adding 80 more officers from the baseline of 386, or 20%, to the daily deployment, ensuring even greater presence and support across the system.

The total law enforcement personnel deployed daily would increase to 466, some organized into Flex Teams to enhance coverage and responsiveness for special operations during major/special events and to address “hot spots” within the transit system network. The Increased Police Service Model is estimated to cost **\$214,890,478** per year vs. \$194,051,691 (Multi-Agency Contract Cost).

Given that the majority of concerns on the Metro system are quality-of-life issues, staff recommends implementing the Enhanced Service Model to optimize the TCPSD's performance, align with Board priorities, and address customer and employee concerns.

Phased Implementation Plan

The organization structure is anticipated to be implemented in three phases over five years. The phases include 1) transition planning, 2) resource planning and recruitment, and 3) monitoring and evaluation.



The transition from the multi-jurisdictional law enforcement model to the new TCPSD model will begin with robust transition planning in Phase 1. Simultaneously, recruitment efforts will be initiated to fill critical leadership positions within the new department, including the appointment of a Chief of Police and essential command staff members.

By Year 5, Phase 3, the TCPSD is envisioned to be fully staffed and able to focus fully on operations, monitoring, and evaluation. The TCPSD will develop meaningful and relevant Key Performance Indicators (KPIs) that allow the department to assess progress against desired outcomes. Targets for each KPI will be based on historical performance, industry standards, or department objectives. The Department will also seek accreditation as a law enforcement agency through the Committee on Accreditation for Law Enforcement Agencies (CALEA) as an agency that adheres to specific, publicly recognizable standards of performance and accountability.

Establishment of A Transition Team

The first step in establishing the TCPSD will be to form a dedicated Transition Team to support effective internal and external coordination. It will be imperative to engage an individual to lead this effort who has a deep understanding of law enforcement dynamics, potentially with specialized policing expertise in a campus, airport, or transit environment. More broadly, the team will be

comprised of members who possess expertise in law enforcement, security, bus and rail transit operations, social services, and change management. Leveraging this external expertise, particularly in multi-jurisdictional coordination, will enable the execution of a thoughtful and comprehensive transition plan.

Executive Recruitment

The first hire during the Transition Phase will be the Chief of Police, who will report directly to the CEO. This leadership position will set the stage for subsequent efforts to recruit officers and TCPSPD personnel. Metro intends to use a recruiter who specializes in public safety leadership positions. The ideal candidate for the position should not only be Peace Officer Standards Training (POST)-certified but should also embody visionary leadership, accessibility, and a commitment to collaboration within a diverse transit community. The candidate should value diversity, equity, and inclusion principles and demonstrate dedication to translating these principles into tangible results through values-based decision-making.

Engaging Metro's customers and employees in recruiting a Chief is vital to ensuring the selection resonates with the transit community's expectations. The recruitment process will be widely publicized across multiple channels, promoting broad awareness and participation. This would include various communication platforms such as local media, social media, and community meetings, focusing on transparency and inclusiveness. Recognizing that some community groups are often underrepresented, targeted outreach efforts will be included to ensure all voices are heard. The CEO will incorporate this feedback into the final hiring decision.

Labor Negotiations and Establishment of Benefits

The labor negotiation process for the new transit police workforce is anticipated to span from six months to a year. Initial dialogues will begin with the unions upon Board approval, followed by formal bargaining sessions where proposals are negotiated, leading to agreements on wages, benefits, and working conditions. Once a consensus is reached, a contract will be drafted and ratified, solidifying the employment terms for the transit police team. Labor Relations will lead these negotiations to ensure alignment and budget capacity for certain aspects such as wages, benefits, working conditions, disciplinary procedures, and other terms of employment for TCPSPD employees.

Currently, Metro does not have an active safety pension plan or employees who would qualify for such a plan. The retirement provisions for safety plans are distinct from Metro's existing pension plans for active employees and retirees under the Public Transportation Services Corporation (PTSC). Therefore, a new safety category would need to be added to Metro's plan to specifically cover the sworn law enforcement personnel within TCPSPD. Metro will engage with labor unions while developing and reviewing the proposed pension and benefit plans.

Mutual Aid Agreements

California's Mutual Aid Law outlines responsibilities for mutual aid. Surrounding law enforcement agencies are required to respond to local emergencies and calls for service, and response agencies are required to assist at the direction of the requesting agency's Chief of Police. When mutual aid is requested, support must be sustained for the duration of the event or incident. The TCPSPD must be

prepared not just to request aid but also to offer equivalent assistance to other agencies. The Transition Team will oversee mutual aid agreements and current contract law enforcement services to mitigate operational gaps during the transition period.

Beyond Mutual Aid obligations, desirable collaborations with other law enforcement agencies and the Los Angeles County Police Chiefs Association in the form of memorandums of understanding to govern emergency response, specialized services, cooperative training (tabletop and full-scale exercises), and to establish clear response plans to emergencies, calls for service, and large-scale events will be created in partnership with law enforcement agencies in the region.

Key objectives during the Transition Phase will include:

- Utilizing mutual aid agreements to ensure coverage during the transition period as new officers are recruited and onboarded;
- Establishing contracts for specialized services and units such as K9 and SWAT teams and
- Addressing the needs and management of detention facilities.

All current contract law enforcement partners have agreed to cooperate with a transition if the Board decides to bring law enforcement services in-house.

Adherence to Best Practices

Evidence of accountability, transparency, and measurable progress in addressing safety and security concerns within the transit environment will foster trust and positive relationships between law enforcement and the public it serves.

By defining specific KPIs such as response times, incident resolution rates, and community engagement metrics, agencies can hold officers accountable for their actions and outcomes. This accountability fosters a culture of responsibility and professionalism among law enforcement personnel. With Metro regularly monitoring and evaluating uniform KPIs, there will be greater awareness of service delivery gaps and greater flexibility in directing resources to meet desired outcomes. This data-driven approach allows agencies to make informed decisions and allocate resources where they will have the most significant impact.

To further promote transparency and accountability, the TCPSD will utilize the services of Metro's Office of the Inspector General (OIG), an independent and objective organization reporting to the Metro Board of Directors. Metro proposes creating a Civilian Review Committee (CRC) during Phase 3 of the Implementation Plan. CRCs are a best practice used nationwide to promote transparency, accountability, trust, and respect between the police department and the communities it serves. CRCs aim to strengthen the public and law enforcement relationship while supporting efforts to hold law enforcement officers accountable for misconduct. The primary function of the CRC will be to coordinate directly with the OIG to hear and evaluate complaints about officer misconduct, review the findings of audits and internal affairs investigations, and make recommendations for Metro leadership's consideration.

Community Engagement

Community outreach and engagement efforts are pivotal in building bridges between law

enforcement agencies and the transit community. The Public Safety Advisory Committee held listening sessions with riders last fall regarding public safety. In November 2023, PSAC established Ad Hoc Committees to focus on the In-House Policing concept. Additionally, they submitted recommendations for establishing an in-house public safety department in April 2024. On June 25, 2024, the Public Safety Advisory Committee (PSAC) voted 7-2 to support establishing an In-House Metro Transit Community Public Safety Department utilizing the Enhanced Public Safety Service Model. Overall, the PSAC members agreed that the recommendation effectively addressed the comments and concerns previously raised with Metro staff. However, two members voiced their apprehension about what they perceived as a shift towards a more social agency role at the expense of law and order.

The Committee posed several questions regarding Metro's continued collaboration with law enforcement partners, the agency's ability to recruit sufficient officers, the criteria used to establish geographic zones, and the importance of ensuring resource allocation based on actual needs. Members also emphasized that buses should not be an afterthought in the development of the plan, advocating for a more prominent role for buses in future iterations.

The PSAC chair stressed the importance of the Committee's ongoing involvement in the implementation and refinement of the plan. In response, staff committed to maintaining a strong partnership with PSAC throughout the process to ensure the plan's success and responsiveness to the community's needs.

Further establishing forums, dialogue sessions, and partnerships with community leaders, activists, and organizations will facilitate open conversations about issues, priorities, and perceptions related to policing. Transparency is key in this process, and Metro will commit to providing accessible information about procedures, policies, and accountability mechanisms.

Developing a comprehensive community engagement plan (Engagement Plan) is pivotal for successfully implementing the TCPSD. The Engagement Plan will include establishing the goals and objectives of the communications strategy, identifying internal and external key stakeholders, developing key messages, and identifying effective communication channels and partnerships with elected officials, community-based organizations, and neighborhood councils.

DETERMINATION OF SAFETY IMPACT

Based on the findings from the In-House Public Safety Feasibility Study, transitioning to an in-house Public Safety Department could significantly enhance safety across the Metro system. The zone deployment model, where officers are actively on the Metro system, will result in a more visible, engaged presence. Moreover, the majority of incidents on the Metro system are related to quality-of-life issues. These issues include people who are experiencing homelessness and are sheltering on the system, untreated mental illness, and an opioid epidemic, which require a different approach than traditional law enforcement methods typically provide.

The proposed in-house Public Safety Department aims to address these concerns by enhancing multiple non-law enforcement layers in its structure. One of the key components of this approach is the inclusion of crisis interventionists/clinicians. These professionals are trained to handle situations involving vulnerable populations with the appropriate care and support needed to resolve issues effectively and humanely. They are skilled in de-escalating situations involving individuals experiencing mental health crises or other emotional disturbances. Their presence can prevent situations from escalating into emergencies that would otherwise require police intervention. By addressing these incidents promptly and effectively, crisis interventionists help maintain order and safety on the Metro system.

Overall, the transition to an in-house Public Safety Department with these additional layers of support is expected to lead to a more comprehensive and effective approach to public safety. It recognizes the importance of addressing the root causes of quality-of-life issues and provides targeted interventions that are more suited to the unique environment of the Metro system. This strategy not only enhances the overall safety for passengers and staff but also fosters a more inclusive and supportive community within the Metro system.

FINANCIAL IMPACT

In February 2017, the Metro Board approved the multi-agency law enforcement services contract for a five-year base period with a not-to-exceed amount of \$645 million through June 30, 2022. The contracts have been amended several times, and the current total contract value for the seven years is \$1,110,563,642.86 through June 30, 2024. The current FY24 multi-agency contract costs approximately \$194 million.

These costs have escalated 12.2% on average year over year and have a high overhead rate. Metro is not able to control these growth rates, and such costs are anticipated to be further exacerbated if other jurisdictions are added to the current model. With an in-house department, Metro will be able to implement better budget/cost controls.

Metro projects potential savings by transitioning from a multi-agency law enforcement model to an in-house transit public safety model. These savings are anticipated to be fully realized after the implementation of the new model, with significant cost reductions expected to begin in Year 6 after the complete transition to in-house public safety.

As described above, Metro staff proposes implementing the Enhanced Service Model, which retains the current number of daily deployments of 386 law enforcement officers in the field. Compared to the current contract, this would achieve a cost savings of \$26 million in terms of law enforcement personnel.

This model proposes investing the \$26 million in projected cost-difference realized during the transition from contracted services to an in-house model to increase the number of field-based personnel, including additional Transit Ambassadors, Crisis Interventionists/Clinicians, and Homeless

Outreach, by an additional 227 to increase the visible presence on Metro and expand and enhance alternatives to policing. It also allocates funds to increase innovative Public Safety Infrastructure Improvements at transit stations. The annual cost of these additional resources after reaching full implementation in Year 6 is projected at \$24.56 million annually.

The Service Model 2-Enhanced, for the same number of daily deployed sworn personnel and increased layer deployment, is estimated to cost **\$192,566,505** per year vs. \$194,051,691 (Multi-Agency Contract Cost).

EQUITY PLATFORM

Metro recognizes that relationships between law enforcement and people of color have been strained due to unjust actions such as racial profiling and a disproportionate number of incidents, tickets, and arrests being issued to people of color. An in-house Public Safety Department would empower the agency with the authority to implement safeguards, oversight, and training of officers based on agency priorities and values, promoting the treatment of all riders with dignity and respect in accordance with the Board approved Bias-Free Policing policy. Furthermore, an in-house Public Safety Department would allow for a transit policing style of engaged visibility where officers are more visible across the system, thus increasing the feeling of safety for riders and employees.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports strategic plan goal 2.1 of committing to improving security. Based on the In-House Public Safety Feasibility Study findings, transitioning to an in-house Public Safety Department would enhance safety.

ALTERNATIVES CONSIDERED

The Board could choose to forgo transitioning to a TCPSD primarily due to financial concerns raised by Los Angeles County Sheriff Luna (Attachment C). Staff does not recommend this because the analysis has determined there are cost savings associated with an in-house public safety department. Further, the Board could choose to not transition to an in-house department that utilizes the Enhanced Public Safety Service Model, opting instead to continue with a contract law enforcement model. However, this approach is not recommended due to several significant drawbacks:

1. **Lack of Alignment with Metro Policies, Procedures, and Safety Approaches:** The contract law enforcement model does not fully align with Metro's specific policies, procedures, and holistic safety strategies, potentially leading to inconsistencies in service and operational effectiveness.
2. **Operational Control and Accountability:** An in-house department provides greater operational control and accountability. With a contract model, the Metro has limited oversight and influence over the day-to-day operations and strategic decisions, which can hinder

responsiveness and adaptability.

3. Continuous and Unsustainable Cost Escalation: The contract law enforcement model is subject to continuous and unsustainable cost increases, making it a less viable long-term solution. Transitioning to an in-house model could offer more predictable and manageable financial planning and resource allocation.

These key areas have been consistent challenges throughout the three decades of outsourcing law enforcement and have proven to be intractable. Therefore, the five-year phased transition to a Transit Community Public Safety Department with an Enhanced Public Safety Service Model is the recommended path forward.

NEXT STEPS

Staff will mobilize a transition team of subject matter experts upon Board approval. Also, staff will initiate a Communications Plan and commence the recruitment efforts for the new Chief of Police. Staff will report back to the board quarterly with progress updates.

ATTACHMENTS

Attachment A - Transit Community Public Safety Department Implementation Plan

Attachment B - Motion 21.1

Attachment C - Letter from Los Angeles County Sheriff Luna and Metro Response

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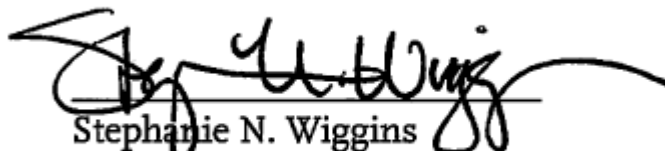
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