

## **Board Report**

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

File #: 2019-0426, File Type: Informational Report Agenda Number: 9.

FINANCE, BUDGET AND AUDIT COMMITTEE
JUNE 19, 2019

SUBJECT: FISCAL YEAR (FY) 2016-2018 TRIENNIAL PERFORMANCE REVIEW REPORT

ACTION: RECEIVE AND FILE

### RECOMMENDATION

RECEIVE AND FILE the:

- A. FY 2016-2018 Triennial Performance Review of Los Angeles County Transit Operators and Metro Operations; and
- B. FY 2016-2018 Triennial Performance Review of the Los Angeles County Metropolitan Transportation Authority (Metro) as the Regional Transportation Agency (RTPA).

### **ISSUE**

The Transportation Development Act (TDA) requires Triennial Performance Reviews of Transit Operators and RTPAs. The FY 2016-2018 Triennial Performance Review Report is completed and the report presents the results of the review.

#### DISCUSSION

The California Public Utilities Code (PUC) Section 99246, included in the Transportation Development Act (TDA), requires Metro to conduct an independent performance review of all Los Angeles County Transit Operators receiving TDA Article 4 funds, as well as operators receiving Proposition A funds in lieu of TDA funds. The TDA also requires that regional transportation planning agencies (RTPAs) undergo an independent performance review, focusing particularly on the planning roles. The review is conducted every three years, and Metro must send a Certificate of Completion to the California Department of Transportation (Caltrans), so that Metro may receive and allocate TDA and State Transit Assistance (STA) funds for Los Angeles County.

Under contract to Metro, the firm of BCA Watson Rice, LLP independently conducted the FY 2016-2018 Performance Review of the Transit Operators, Metro Operations and Metro as the RTPA for Los Angeles County. The following summarizes the scope of the review:

A. REVIEW OF LOS ANGELES COUNTY TRANSIT OPERATORS AND METRO OPERATIONS

The following Los Angeles County transit operators were included in this review:

- Antelope Valley Transit Authority (AVTA)
- Arcadia Transit
- City of Redondo Beach Beach Cities Transit
- Claremont Dial-A-Ride
- Commerce Transit
- Culver City Bus
- Foothill Transit
- GTrans
- LA County Metropolitan Transportation Authority Operations
- La Mirada Transit
- Long Beach Transit
- Los Angeles Department of Transportation (LADOT)
- Montebello Bus Lines
- Norwalk Transit System
- Santa Clarita Transit
- Santa Monica's Big Blue Bus (BBB)
- Torrance Transit
- City of Burbank
- · City of Glendale
- City of Los Angeles Community DASH Services
- Pasadena Transit

The FY 2016-2018 Performance Review included all areas that the State mandates. Areas reviewed were:

- Verification of TDA data collection and reporting requirements;
- Compliance with (PUC) requirements;
- Progress in implementing prior review recommendations;
- Review of TDA performance indicator trend analysis; and
- High level functional area performance review.

In addition, operators' data submitted for Metro's Transit Performance Measurement Program (TPM) was reviewed. The Metro uses the TPM data to allocate transit subsidy funds to Los Angeles County Transit Operators, including Metro Operations.

### B. REVIEW OF METRO AS THE REGIONAL TRANSPORTATION PLANNING AGENCY (RTPA)

The review of Metro as the RTPA included:

Progress on implementing prior cycle review recommendations;

- Compliance with PUC requirements; and
- Performance results for Metro as the RTPA

### Progress on Implementing Prior Cycle Review Recommendations

The prior review of Metro as the RTPA included one recommendation. This recommendation has been implemented.

#### Compliance with PUC Requirements

The Metro is in full compliance with the applicable PUC requirements.

#### Performance Results for Metro as the RTPA

The review concluded Metro generally functioned in an efficient, effective, and economical manner during the triennial period.

It is important to consider the accomplishments achieved by Metro during the three-year period covered by this Triennial Performance Review. These accomplishments include:

- Passage of Measure M with 71 percent of voters approving provided a strong show of faith in the future of transportation in LA County and the public's growing awareness of the need to build more transportation and maintain our existing transit system.
- Opening of the Expo and Gold Line light rail extensions.
- Construction of the Purple rail line Section 2 and securing the full funding grant agreement.
- Extension of the Silver bus line to San Pedro.
- Adoption of the updated affordable housing joint development policy.
- Launching of Metro's Bike Share program.
- Adoption of the 28 by 2028 transportation construction program and rail construction acceleration initiative.
- Development of the unsolicited proposal policy.
- Began development of Metro Transportation School, a four-year boarding prep school for disadvantaged youth.
- Developed the First / Last mile policy.
- Initiated the Nextgen schedule revision including significant market research, travel demand analysis using location based and TAP fare data, and public outreach and input meetings.
- Passage of SB 1 providing increased transportation funding.
- Adopted goal of moving to zero-emission buses by 2030.
- Revised the safety and security approach and structure for rail and bus lines.
- Increased efforts to address the adverse impacts of homelessness on the rail system.
- Initiated the update to the Long-Range Transportation Plan (LRTP).
- Completed the Vision 2028 Strategic Plan.
- Established the Public Private Partnership (P3) program and framework.
- Began focusing on transit assets and state of good repair every year.
- Negotiated all five labor union contracts and settled before contracts expired and have 5-year contracts instead of three providing extended labor peace.
- Developed a working group of larger municipal operators to work together to consolidate fare rules throughout the region.
- Working with municipal operators, developed the "Ridership Growth Action Plan" to review causes of ridership

decline and develop strategies to address major factors.

Developed a plan to shut down and rebuild Metro Blue Line.

The key findings of the FY 2016-2018 Metro as RTPA Triennial Performance Review are summarized in Attachment B.

#### FINANCIAL IMPACT

There are no financial or budget impacts as a result of this review.

#### **IMPLEMENTATION OF STRATEGIC PLAN GOALS**

Recommendation supports strategic plan goals 4 and 5. Goal 4: Transform LA County through regional collaboration and national leadership. Goal 5: Provide responsive, accountable, and trustworthy governance within the Metro organization.

#### **NEXT STEPS**

As required by PUC §99246, staff will transmit the FY 2016-2018 Triennial Performance Review reports to the State Department of Transportation. Copies of the reports are available upon request.

#### **ATTACHMENTS**

Attachment A - FY2016-2018 Triennial Performance Review Executive Summary

Attachment B - FY2016-18 Performance Review

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## **Legislative Mandate**

The California Public Utilities Code (PUC) Section 99246, included in the Transportation Development Act (TDA), requires Metro to conduct an independent performance review of all Los Angeles County Transit Operators receiving TDA Article 4 funds, as well as operators receiving Proposition A funds in lieu of TDA funds. The review is conducted every three years, and Metro must send a Certificate of Completion to the California Department of Transportation (Caltrans), so that Metro may receive and allocate TDA and State Transit Assistance (STA) funds for Los Angeles County.

The three-year period reviewed encompasses the period from July 1, 2015 through June 30, 2018. The performance review included a review of the following:

- Compliance with PUC ensuring compliance with applicable PUC requirements.
- Data Collection and Reporting verification of TDA data collection and reporting procedures.
- *Prior Review Recommendations* reporting on implementation of the prior triennial performance review recommendations.
- Performance Trends summaries of performance indicators for the review period.
- Functional Review high-level review of key functional areas surveyed as part of the process of conducting the review, resulting in suggestions for operational and management improvements.

# **Municipal Operators**

## Summary of Key Findings

The municipal operators were generally in compliance with the requirements set forth in the PUC. The most common compliance-related issues or issues in addressing prior triennial performance review recommendations included the following:

- Data consistency the consistency of data reporting was an issue for many of the operators, but most of these issues related to timing differences in when reports were submitted and definitional differences in how certain categories of metrics were defined by the different agencies.
- Farebox Recovery Ratio in prior reports, some municipal operators had recommendations related to raising their farebox recovery ratio in lieu of using local subsidies. However, in many instances, the municipal operators made a policy decision not to raise bus fares in an effort to maintain affordable transit options for their services.

### Key Challenges

The most common challenges faced by the municipal operators related to two key issues:

- Declining Fixed Route Ridership over the last several years, most municipal operators have experienced some level of decline in their fixed route ridership. The general consensus on the reasons for the decline include increased car ownership, easier access to drivers' licenses, stable gas prices and increased use of micro-transit options such as Uber and Lyft.
- Challenges in Recruiting and Retaining Bus Operators many municipal operators indicated that in the current labor market, they have been experiencing greater challenges in recruiting and retaining bus operators and, to a lesser degree, bus maintenance staff.

### Key Accomplishments

Each operator had their own unique set of accomplishments during the review period. Listed below is one key accomplishment for each operator:

- AVTA -- issued purchase orders for 80 new all-electric zero emission buses, becoming the first transit agency in the United States to commit to an all-electric fleet. The new buses will all be on site by the end of 2019.
- Arcadia -- conducted a comprehensive review of its ridership from FY17 in an
  effort to make adjustments to the newly implemented fixed route and demand
  response system. Recommended changes to the system included schedule
  modifications, bus stop relocations and additions, and route extensions.
- Beach Cities Transit added Beach Cities Transit general and senior/disabled monthly passes to TAP and posted promotional information on the use of mobile validators on fixed route services.
- Burbank -- completed a comprehensive operational analysis. The report provides a line-by-line analysis with recommendations for each route. The report reviewed, among other things, ridership levels, running times, and on-time performance.
- Claremont -- underwent a comprehensive assessment of its services in FY17.
   The goal of the assessment was to document the service characteristics of riders and the nature of their trips, identify gaps in services, areas of unmet need or latent demand.

- Commerce -- added a new "Purple Route" during the review period which operates Monday through Friday through the heart of the City serving shopping areas, the Citadel and City Hall, among other locations.
- Culver City in collaboration with Culver City Unified School District on safe routes to school, Culver CityBus expanded marketing outreach to develop a dynamic transit video to increase education and awareness of transit programs.
- Foothill Transit assumed operation of Lines 190, 194 and 270 from Metro, representing Foothill's largest service expansion in 14 years.
- Gardena conducted a fare analysis to address restructuring options for increasing revenues, while adding regional TAP fare integration and incentives.
- Glendale -- began the process of building a new maintenance and operations facility which should provide significant benefits to the maintenance and storage of the Beeline vehicles.
- La Mirada -- conducted a competitive bid process for its transit services and executed a four-year contract with MV Transportation to provide its demand response services.
- LADOT conducted over 40 public meetings and engaged more than 1,600 members of the public in completing a systematic evaluation of each DASH and Commuter Express route, and the Cityride paratransit program.
- Long Beach Transit -- conducted a comprehensive operational analysis in 2017, its first in 13 years which included a number of short-, medium- and long-term service recommendations.
- *Montebello* -- implemented a new scheduling software and hired a management analyst to review routes on an on-going basis to improve productivity.
- Norwalk -- in 2016, assumed operation of Metro Line 270, renaming it Route 7 and realigning it to operate between El Monte Station and Norwalk's Green Line Station.
- Pasadena in 2017, was awarded the Outstanding Transportation Agency by the California Association of Coordinated Transportation, the largest state transit association in the country.
- Santa Clarita -- began the process of developing a ten-year Transportation Development Plan to address the needs and transportation dynamics within the

Santa Clarita Valley. The City began the process in April of 2018 and it is expected to be completed in 2019.

- Santa Monica in 2016, received the American Public Transportation Association Sliver Status award for Sustainability.
- *Torrance* in 2018, developed the Torrance Transit Mobile App, in partnership with Google Maps, to allow patrons to access real-time bus information from smart phones and computers.

## **Metro Operations**

### Summary of Key Findings

Metro Operations met all compliance requirements with respect to the PUC. Additionally, Metro's data reporting was largely consistent with minor inconsistencies being the likely result of timing differences in the submission of reports or noted inconsistencies in category definitions by the reporting agencies. Metro Operations complied with all prior triennial performance review recommendations.

### Key Challenges

Similar to the municipal operators, Metro Operations struggled with both a decline in fixed route ridership as well as difficulties in recruiting and retaining both bus operators and maintenance staff. In addition, due to delays in procuring and receiving new buses, Metro took approximately 340 buses out of retirement for a period of time during the review period as a means of maintaining its bus fleet at appropriate levels.

## **Key Accomplishments**

Metro Operations had a series of significant accomplishments during the review period including the following:

- Metro opened Division 13, a state-of-the-art bus maintenance and operations facility. The new facility will accommodate 200 CNG buses, fueling equipment and transportation offices for staff. The facility was, in part, funded by \$53.2 million in federal funding which contributed to the \$120 million total cost.
- Metro began a collaborative entitled the Regional Ridership Improvement Task
  Force to address the issue of declining ridership from a regional perspective.
  Metro brought together seventeen different transit agencies from the region to
  review ridership and travel trends.
- Metro initiated a comprehensive look at the future of transit within Los Angeles County entitled the NextGen Bus Study. The study is, in part, a response to the regional decline of bus route ridership in Los Angeles County.

## **Countywide Performance**

The following is a summary of total system trends for Municipal Operators and Metro Operations. The importance of these trends is to show the general change in performance related to the overall system.<sup>1</sup> The key takeaway from these metrics is that ridership declines are impacting overall efficiency and productivity of the overall system.

### Ridership

Overall, ridership for both the Municipal Operators and for Metro Operations declined over the review period. While some demand response systems and Metro's light rail system showed ridership gains, virtually all of the fixed route systems had a decline in ridership which impacted the overall system numbers. The following charts show the aggregate ridership numbers and the percentage change since the FY 2015 base year:

Municipal Operators						
Total System Unlinked Passengers						
FY15	FY15 FY16 FY17 FY18 % Change					
119,992,290 110,970,815 101,880,973 96,618,965 -19.48%						

Metro Operations						
Total System Unlinked Passengers						
FY15	FY15 FY16 FY17 FY18 % Change					
457,355,979 386,981,387 407,153,682 394,361,657 -13.77%						

#### **Vehicle Service Hours**

Overall, Vehicle Service Hours showed a small rise for Municipal Operators while Metro Operations experienced relatively stable numbers. The following charts show the aggregate vehicle service hours and the percentage change since the FY 2015 base year:

Municipal Operators						
Total System Vehicle Service Hours						
FY15	FY15 FY16 FY17 FY18 % Change					
4,208,475 4,367,319 4,455,602 4,537,714 7.82%						

<sup>&</sup>lt;sup>1</sup> It is important to note that these numbers reflect the "total system" for the Municipal Operators which includes both fixed route and demand response services. Likewise, the numbers for Metro Operations include fixed route, heavy rail and light rail.

Metro Operations						
Total System Vehicle Service Hours						
FY15	FY15 FY16 FY17 FY18 % Change					
8,066,619 8,130,883 8,084,889 8,030,689 -0.45%						

### **Cost Per Passenger**

Cost per passenger rose sharply for both Municipal Operators and Metro Operations during the review period, a reflection of the decrease in ridership numbers experienced almost across the board by the agencies. The following charts show the aggregate cost per passenger and the percentage change since the FY 2015 base year:

Municipal Operators						
Total System Cost Per Passenger						
FY15	FY15 FY16 FY17 FY18 % Change					
\$3.90 \$4.32 \$5.07 \$5.72 47.0%						

Metro Operations						
Total System Cost Per Passenger						
FY15	FY15 FY16 FY17 FY18 % Change					
\$3.07 \$4.07 \$4.28 \$4.51 46.9%						

#### **Cost Per Vehicle Service Hour**

Cost per vehicle service hour rose for both Municipal Operators and Metro Operations during the review period. The following charts show the aggregate cost per vehicle service hour and the percentage change since the FY 2015 base year:

Municipal Operators							
Total System Cost Per Vehicle Service Hour							
FY15	FY15 FY16 FY17 FY18 % Change						
\$111.06							

Metro Operations						
Total System Cost Per Vehicle Service Hour						
FY15	FY15 FY16 FY17 FY18 % Change					
\$174.15   \$193.79   \$215.46   \$221.31   27.08%						



## **Background, Scope and Methodology**

The California Public Utilities Code requires all Regional Transportation Planning Entities (RTPE) to conduct an independent Triennial Performance Review in order to be eligible for Transportation Development Act (TDA) funding. In July 2018, Metro selected BCA Watson Rice, LLP to conduct a Triennial Performance Review of itself as the RTPE and operator, as well as the twenty-one municipal operators to which Metro allocates funding. This Triennial Performance Review covers a three-year period ending June 30, 2018.

This Triennial Performance Review was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) and in accordance with the processes established by the California Department of Transportation, as outlined in the Performance Audit Guidebook for Transit Operators and Regional Transportation Planning Entities.

The review methodology for this Triennial Performance Review of Metro as the RPTE included four tasks:

- 1. Project Initiation
- 2. Initial Review
- 3. Detailed Review
- 4. Documentation of Performance Audit Results

This Triennial Performance Review included the following elements:

- 1. Compliance Requirements
- 2. Follow-up of Prior Recommendations
- Review of Metro Functions
- 4. Findings and Recommendations

# **Key Accomplishments**

It is important to consider the accomplishments achieved by Metro during the three-year period covered by this Triennial Performance Review. These accomplishments include:

Passage of Measure M with 71 percent of voters approving provided a strong show
of faith in the future of transportation in LA County and the public's growing
awareness of the need to build more transportation and maintain our existing
transit system.



- Opening of the Expo and Gold Line light rail extensions.
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- Extension of the silver bus line to San Pedro.
- Adoption of the updated affordable housing joint development policy.
- Launching of Metro's Bike Share program.
- Adoption of the 28 by 2028 transportation construction program and rail construction acceleration policy.
- Development of the unsolicited proposal policy.
- Began development of the Metro Transportation School, a four-year boarding prep school for disadvantaged youth.
- Developed the first / last mile policy.
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- Working with municipal operators, developed the "Ridership Growth Action Plan" to review causes of ridership decline and develop strategies to address major factors.
- Developed a plan to shut down and rebuild the Metro Blue Line.



## **Compliance Requirements**

To determine Metro's compliance with requirements the review team identified key compliance requirements, discussed compliance requirements with Metro representatives, and gathered and reviewed evidence of compliance. Metro was found to be in compliance with all applicable requirements evaluated as part of this Triennial Performance Review.

## Follow-Up of Prior Recommendations

The prior Triennial Performance Review completed in 2016 included no compliance recommendations and one functional recommendation.

1. Enhance coordination between the Office of Management and Budget (OMB) and Planning departments.

Status: Implemented – Coordination between OMB and Planning has improved.

### **Review of Metro Functions**

The following sections discuss the results of the review of Metro functions.

# Planning and Programming of Transportation Funds

The planning and programming of transportation funds in Los Angeles County has challenges unlikely to be found elsewhere including programming authority for 50 distinct local, state, and federal sources of funds; responsibility for allocating over \$6 billion annually in funds; a need to assess, refine, and program funding requests in a way that is fair, transparent, and consistent with multiple needs; political and public expectations to move guickly and boldly to increase capacity on a badly strained transportation system.

Within this context, successfully planning and programming transportation funds requires several key elements including accurately forecasting available funds, developing criteria for evaluating funding choices, evaluating capital funding requests, and balancing revenue and expenditures. The review team concluded Metro has planned and programmed transportation funds and addressed the challenges faced methodically, effectively, and efficiently over the triennial period.

# Transportation Funds Administration

Metro administers several funds. Successful administration of these funds requires several elements including clear identification of guidelines or requirements, appropriate



tracking and certifying of the use of funds, reasonable flexibility, and coordination and assistance to municipal operators receiving funds. The review team concluded that Metro has developed approaches to each of these elements, and effectively and efficiently administered transportation funds for the region during the triennium.

### Rail Construction Program

Metro is responsible for planning and building a rail transit system. This undertaking includes alternative analysis, design, construction, and pre-start-up operations of the project. Ultimately, the rail transit system will serve the San Fernando Valley, West Los Angeles; South-Central Los Angeles/Long Beach; South Bay/Harbor; Century Freeway Corridor; and the San Gabriel Valley. Since July 2015, Metro has opened one new line, greatly expanded a second, started construction on four others, and completed the draft environmental impact report on five more.

Metro has implemented several practices to accelerate rail construction including life cycle costing, project labor agreements, programs to work with communities affected by rail construction, involving operations in the early stages of project design, consolidating construction contracts, revised authority for certain change orders, implementation of strict ethics requirements for employees and contractors, and development of a detailed Project Management Plan.

The review team concluded Metro continues to be effective in planning, designing and constructing a rail transit system for Los Angeles County.

# Legislative Proponent and Analysis (Government Relations)

Metro's ability to plan, program and deliver transportation services is greatly impacted by federal, state and local legislation. Having an effective legislative proponent and analysis program is essential to Metro's ongoing ability and success in delivering transportation services to Los Angeles County.

Metro has an effective government relations function that includes a clear scope and direction, active monitoring of legislative initiatives and activities and active pursuit and advocacy of legislative priorities and positions in coordination with others. The review team concluded Metro's Government Relations function provides a well-focused, well structured, comprehensive and effective legislative proponent and analysis for Metro.



The Air Quality Management Plan is a regional blueprint for achieving the federal air quality standards and healthful air. The South Coast Air Quality Management District (SCAQMD) is responsible for clean air in the South Coast Air Basin, an area that includes Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties. The SCAQMD develops the AQMP every five years, with the most recent plan developed in 2016.

Metro's role in the AQMP is to develop and implement transportation strategies that reduce vehicle miles travelled and related emissions. These strategies are submitted to SCAG and included in the Regional Transportation Plan (RTP) developed by SCAG. The review team concluded Metro meets or exceeds its obligations to support and improve air quality in the Southern California region and the regional Air Quality Management Plan (AQMP).

## Consolidated Transportation Services Agency (CTSA)

Consolidated Transportation Services Agencies were originally created by the Social Services Transportation Improvement Act in 1979 to coordinate and improve social service transportation services.

Metro has taken or directed several key actions to fulfill its CTSA responsibilities including designating Access as the CTSA for Los Angeles County in 1994, developing the *Public Transit-Human Services Transportation Action Plan for Los Angeles County* in 2008, developing the *Social Service Transportation Inventory and Survey* (through Access) in 2014, and adopted the *2016-2019 Coordinated Public Transit – Human Services Transportation Plan for Los Angeles County* in 2015. The review team concluded Metro has met legislatively mandated responsibilities related to planning for coordination and improvement of social service transportation services.

# Management Performance

The review of Metro's management performance included a review of Metro's goal setting and monitoring including related policy decisions, Metro's governance structure and the role of the Board in providing leadership, and allocation of administrative funds.

Metro's goal setting and monitoring processes through the Metro Vision 2028 Strategic Plan and the Equity Platform Framework provide well-founded, well-structured and strong direction for the Metro Board and agency. These efforts and policy statements will serve Metro and those served by Metro over the next decade.

Metro's Board of Directors guides the agency's priorities, projects and activities, and includes 13 members who represent areas throughout Los Angeles County. The Metro Board's governance approach and structure, including the use of committees and advisory bodies, provides Metro with an effective leadership and decision-making system.

The review team concluded Metro's administrative funds were adequately and effectively allocated in order to achieve Metro's stated goals through the budget process.

#### **Internal Administration**

This review of Metro's internal administration included determining if the budget is being used as an effective management tool, if internal controls are adequate and provide appropriate information to management, if accounting procedures are adequate to make fund balances available, and if the organization and reporting structure could be improved.

A good budget process is a broadly defined process that has political, managerial, planning, communication, and financial dimensions. A good budget process incorporates a long-term perspective, establishes linkages to broad organizational goals, focuses budget decisions on results and outcomes, and involves and promotes effective communication with stakeholders. The review team concluded Metro's budget development process incorporates these key characteristics necessary to provide an effective budget for the organization.

Internal controls are designed to safeguard organization's assets from error, loss, theft, misuse, misappropriation, and fraud. Effective programs of internal controls provide reasonable assurance that these objectives are met consistently. The review team concluded Metro has multiple internal controls approaches and systems in place to safeguard its assets from error, loss, theft, misuse, misappropriation, and fraud.

Formal documentation of accounting policies and procedures is an essential component in providing effective controls over accounting and financial reporting, as well as providing a comprehensive framework of internal controls. The review team concluded Metro has adequate accounting procedures and properly accounts for and makes available on a monthly basis its fund balances.

An organization's structure should provide a framework of functional areas within which individuals can achieve the organization's goals. An effective organization structure clearly reflects the priorities of the organization, facilitates effective service delivery and problem solving, ensures consistency of direction and management control, minimizes obstacles and barriers to performance, and stimulates a culture of shared



accomplishment and teamwork. The review team concluded Metro has established a well thought out and focused organization structure that provides an effective framework of functional areas within which individuals can achieve the organization's goals.

## **Findings and Recommendations**

We find the Los Angeles Metro, functioning as the RTPE, to be in compliance with the requirements of the Transportation Development Act. In addition, Metro generally functioned in an efficient, effective, and economical manner during the triennial period.