



Board Report

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CONSTRUCTION COMMITTEE
JULY 17, 2024

SUBJECT: OFFICE OF THE INSPECTOR GENERAL COMPARISON OF METRO RAIL DESIGN CRITERIA TO 11 CITIES ALONG THE SOUTHEAST GATEWAY LINE

ACTION: RECEIVE AND FILE

RECOMMENDATION

RECEIVE AND FILE Office of the Inspector General Comparison of Metro Rail Design Criteria to 11 Cities Along the Southeast Gateway Line.

ISSUE

The Metro Office of the Inspector General (OIG) initiated a study to determine what differences exist between the Metro Technical Specifications and Rail Design Criteria (MRDC) for the design of construction projects and the typical design specifications of cities in Los Angeles County to warrant the creation of costly permitting packages, lengthy permitting review processes, permitting fees, contractor frustrations, and schedule delays resulting therefrom, and if improvements can be made in consistency between the two specifications to reduce these impacts.

BACKGROUND

The OIG's Construction Change Order Spot Check Program focuses on approved change orders and modifications that exceed \$500,000. In the course of performing our review of change orders, it appears that the change orders are subjected to review by cities, permitting fees, and can result in schedule impacts. Change orders can result from several circumstances including differences in design specifications of Metro and the city where Metro construction is occurring. The Southeast Gateway (SEG) Line alignment will be going through Los Angeles, Huntington Park, Vernon, Bell, Cudahy, Downey, South Gate, Paramount, Bellflower, Cerritos, and Artesia (the "11 Cities"). Those cities' specifications were chosen as examples to study. The OIG, along with its consultant, Mott MacDonald, endeavored to compare the MRDC with the design specifications from those SEG Line 11 Cities.

DISCUSSION

Focus on Section 3 of the MRDC.

The MRDC consists of 12 sections. Each section covers the criteria for the disciplines involved in the planning, design, construction, and operation of Metro facilities. In comparing the 11 Cities design criteria with the MRDC, there are many sections that the MRDC covers in detail that are absent from the 11 Cities criteria. This is because the 11 Cities are not doing rail construction. In the absence of any relevant design criteria from the 11 Cities, the design of these Metro facilities is governed by the MRDC. These relevant rail-related MRDC sections include Environmental Considerations, Guideway and Trackwork, Architectural, Mechanical, Electrical, Systems, Operations, Yards and Shops, and Safety Security Systems Assurance. Section 3 of the MRDC provides criteria for the design of transit alignments, track subgrades, drainage systems, right-of-way clearances, access control, service roads, streets, parking facilities, site work, and utility relocations. Notable references that provide a basis for Section 3 criteria include the Manual of Uniform Traffic Control Devices (MUTCD), Caltrans Standard Plans & Specifications, Caltrans Highway Design Manual, and the AASHTO Policy on the Geometric Design of Highways and Streets. Section 3 of the MRDC provides the most detailed information for direct comparison to the 11 Cities' criteria. Therefore, the focus of the review was on Section 3 of the MRDC to the 11 Cities specifications.

Consultant findings on differences between the MRDC and the SEG Line cities.

Uniform design and construction standards, conformed from the MRDC and the criteria of the 11 Cities, would be valuable to guide the development of the SEG Line project and improve project delivery costs and schedule.

Based on a high-level review by the OIG expert consultant of the MRDC to the SEG Line 11 Cities' specifications inconsistencies are rare. Out of over 5,000 specifications compared, only 21 (about .5%) were found to be different.

The 21 specifications identified as different, which the consult refers to as "exceptions", are set forth in Attachment A to the attached report. Importantly, these inconsistencies account for an incredibly small percentage of the total design criteria. The MRDC and the 11 Cities specifications are essentially 99.5% the same.

Potential Cost and Schedule Savings

1. MRDC Updating. Material conflicts between Metro designs and a city's requirements can create change orders. Change orders are costly and cause delays. Because of this, Board Deputies have asked the Inspector General what the differences are between our design specifications and other cities. This report substantially answers that question. The study by this independent expert consultant in the construction industry confirms that there is less than a 1% difference between most cities and the Metro specifications. While change orders can occur due to several reasons, such as differing site conditions, utility relocations, and other reasons, change orders due to differing specifications should be very limited with respect to any inconsistent specifications, so long as Metro's MRDC remains current and consistent with new laws, regulations and best practices.

Recommendation 1: For this reason the OIG recommends that Metro continue to make a

strong effort to make all updates to its MRDC promptly as requirements change and include best practices to ensure cities can trust Metro's MRDC to reflect legally correct and good quality requirements.

2. Permitting Process. Much of a permitting process is to confirm that the Metro specifications are consistent with the reviewing city's specifications. The permitting process is costly. Metro pays a consultant to compile permitting packages comprised of specifications for a project, schematics, and other voluminous information. The city's personnel time is burdened; they charge Metro to review the packages, and those fees are charged against the budget of the project. Review of the thousands of specifications are performed by a city as time and availability allows, that is a potentially lengthy process. Contractors have expressed frustration with the process and used it as a basis to charge Metro. Since we have confirmed that the deviation of Metro's MRDC from most cities' specifications is less than a 1% deviation, it does not warrant a review and permitting process for the entire other ninety-nine percent (99%+) of the project specifications.

Recommendation 2: Metro should endeavor to be self-permitting for all aspects of a project that are substantially consistent or more stringent standards than a city where we are performing construction.

Recommendation 3: The permitting process, if used, should be limited to those nonconforming specifications that are a lower or materially different standard than what a city requires. Again, this is less than 1% of the specifications of a project. This would also result in less burden on the cities where we build. It might also result in more proposers for Metro projects at a lesser cost. It would save money and schedule time on a project. This would mean more funds would be available for safety-related construction, amenities, and higher-quality products for the construction.

This would not result in any less transparency on the projects to the public or the cities. The full set of specifications could still be made available to the cities to review as they wish. A city would have to have faith in Metro that when it brings to them the exceptions to permit, that is all the exceptions. Self-permitting for the conforming specifications involves of some trust by the cities' permitting authorities, and that trust must be earned by Metro by having an MRDC that is accurate, up to date, and addresses typical city concerns and certifying that the exceptions brought forward are verified as the only significant variances.

Recommendations Recap -

The OIG recommends a frequent and regular review and update of the MRDC to ensure consistency with local cities design criteria.

The OIG also recommends that excerpts from reference criteria in the MRDC be removed from the MRDC and replaced with citations referencing to the governing source criteria that form the basis of the MRDC. It should be clearly noted that newer versions of the source criteria, published prior to the start of a notice to proceed with project design, shall govern. Any updates to referenced source criteria after the notice to proceed should be discussed with the affected city.

Lastly, the OIG recommends that self-permitting occur for the specifications that conform to a city's specifications, and an accelerated, abbreviated permitting process be established for the SEG Line project and for other Metro projects in the future, for the non-conforming "exception" specifications related to the project.

This report does not have a financial impact on the Agency, but action taken on the recommendations has the potential to reduce costs related to construction planning, design, and permitting and improve Metro efficiency.

EQUITY PLATFORM

Of the 11 Cities, nine cities have areas Metro has identified as Equity-Focused Communities. Those are Bell, Bellflower, Cudahy, Downey, Huntington Park, Los Angeles, Paramount, and Southgate. In the opinion of the OIG, we considered whether these design criteria presented any equity-related issues on their face. The OIG did not receive any data concerning community impacts. These low-income equity-based communities along the Southeast Gateway Line will benefit from having increased access to Metro Light Rail. The OIG observed no obvious disparate impacts created by the design criteria on small businesses or low-income persons, or by the implementation of the design criteria in a manner that impacted a disadvantaged community beyond what is typical and usual when conducting any construction.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The Office of the Inspector General review and comparison of MRDC to the 11 Cities design criteria is in support Metro's Strategic Plan Goal #5: Provide responsive, accountable, and trustworthy governance within the Metro organization and CEO goals to exercise fiscal discipline to ensure financial stability. The OIG mission includes reviewing expenditures for fraud, waste, and abuse in Metro programs, operations, and resources.

NEXT STEPS

Our preliminary review with management regarding the OIG's report and recommendations was generally positive. Management's response is attached. Management will continue to review the recommendations and implement as appropriate whether to utilize self-permitting or in another form that will increase the path forward on construction projects.

ATTACHMENTS

Attachment A - Report on Comparison of Metro Rail Design Criteria to 11 Cities along the Southeast Gateway Line

Attachment B - Management's Response

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Comparison of Metro Rail Design Criteria to Cities along Southeast Gateway Line

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ACRONYM	DEFINITION
AASHTO	American Association of State Highways and Transportation Officials
ADA	Americans with Disabilities Act
ADAAG	Americans with Disabilities Act Accessibility Guidelines
AHJ	Authorities Having Jurisdictions
ANSI	American National Standards Institute
APTA	American Public Transit Association
APWA	American Public Works Association
AREMA	American Railway Engineering and Maintenance Association
CBC	California Building Code
CEQA	California Environmental Quality Act
CLSM	Controlled Low Strength Material
CPUC	California Public Utilities Commission
DBE	Design Basis Earthquake
EX	Exception
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
HVAC	Ventilating, and Air-Conditioning
IBC	International Building Code
LABOE	Los Angeles Bureau of Engineering
LACMTA	Los Angeles County Metropolitan Transportation Authority
LAMC	Los Angeles Municipal Code
LID	Low Impact Development
LOS	Level of Service
LRFD	Load and Resistance Factor Design
LRT	Light Rail Transit
MCA	Master Cooperative Agreement
MDE	Maximum Design Earthquake
MRDC	Metro Technical Specifications and Rail Design Criteria
MRT	Metro Rail Transit
MSF	Maintenance and Storage Facility
MUTCD	Manual of Uniform Traffic Control Devices
NE	No Exception
NTP	Notice to Proceed
OIG	Metro Office of the Inspector General
SB	Senate Bill
SEG Line	Southeast Gateway Line Transit Corridor Project
VMT	Vehicle Miles Traveled

Executive Summary

The Los Angeles County Metropolitan Transportation Authority (LACMTA or Metro) serves as the planner, coordinator, designer, builder, and operator of the public transportation system for Los Angeles County. The Metro Office of the Inspector General (OIG) in its periodic audit of construction change orders of rail projects has discovered some inconsistencies between the **Metro Rail Design Criteria (MRDC)** and the design criteria of local authorities having jurisdiction (AHJ) within Los Angeles County.

The Southeast Gateway (SEG) Line project is a planned light rail corridor that will traverse through 11 cities along its alignment. The cities of Los Angeles, Huntington Park, Bell, Cudahy, Downey, South Gate, Paramount, Bellflower, Cerritos, Vernon, and Artesia, plus the County of Los Angeles are collectively referred to in this report as the “SEG Line Cities”. The OIG determined that it is best practice and beneficial to determine commonality between the MRDC and the SEG Line Cities’ criteria prior to issuance of the construction contract.

A unified design and construction standard, conformed from the MRDC and the design criteria of the SEG Line Cities would be valuable for delivery of the construction contract. Mott MacDonald was retained by the Metro OIG to assist Metro in comparing the relevant sections of the MRDC to the SEG Line Cities design criteria and to produce a report and spreadsheet detailing any variances. From the high-level analysis, we addressed potential gaps and made recommendations for building an integrated set of documents and specifications for the upcoming SEG Line construction contract.

The request from the OIG to the Mott MacDonald team was to perform the task at a high-level within a limited scope, time, and budget; therefore, the evaluation and comparison performed on the two sets of documents under this task are at a high-level and should be as expected, an initial study report to guide towards future development of a unified design and construction standard. Metro OIG’s three main objectives for this task and our delivery approach are as follows:

Understand

- Gather the latest MRDC.
- Gather SEG Line Cities design criteria.
 - The OIG’s request for information from the SEG Line Cities and their responses are the basis of data used; however, the Mott MacDonald team initialed contact with cities when their responses needed additional clarity.
- Analyze and understand the MRDC and SEG Line Cities design criteria.

Identify

- Identify the relevant design and construction criteria from the MRDC.
- Identify the appropriate SEG Line Cities design criteria for comparison.
- Evaluate the documents for variances.

Report

- Develop and populate a spreadsheet comparing the SEG Line Cities design criteria and the MRDC.
- Generate methodology to evaluate and resolve the discrepancies.
- Write a report summarizing findings and recommendations.

The spreadsheet with over five thousand MRDC identified items for comparison is included in this report as Appendix A2, and a smaller list of specific exceptions where criteria differ between the MRDC and SEG Line Cities in Appendix A1. In general, we have categorized the items as performance or prescriptive based criteria. The performance-based items are “resolved” items, unless stated otherwise, because the typical language in the MRDC either defers to the AHJ criteria or more stringent governing codes and criteria. The prescriptive criteria are compared against the appropriate SEG Line Cities criteria when available. The Greenbook is relied on by many cities; therefore, the Greenbook was compared to the MRDC.

Construction and policy restrictions from the SEG Line Cities were generally not evaluated because we are not privy to the requirements, and they were not provided in discovery. The granular detailed information needed to perform this work cannot be achieved in this high-level review. To investigate construction and policy restrictions of the SEG Line Cities would require more extensive resources and time. We recommend further evaluation in detailed design or as a significant separate continuing effort.

The immensity of data needed to be compared and validated between the MRDC and the SEG Line Cities’ criteria, codes, regulations, and restrictions is a daunting endeavor; however, having the two sets of documents in conformance and any conflicts mitigated is vital for the successful implementation of the SGL construction contract. The framework and initial evaluation developed in this task should be used to guide the continuation of this effort to completion, but “best practice” would seek resolution prior to the start of final design and construction.

1 Introduction

1.1 Project Summary

The Southeast Gateway Line (SGL) is a new light rail transit (LRT) corridor connecting southeast LA County to downtown Los Angeles. The SGL corridor includes a 14.5-mile-long segment connecting Pioneer Station in the City of Artesia to Slauson Station along the A Line in unincorporated Florence-Firestone. It includes nine stations, five parking facilities, and a new 21-acre Maintenance and Storage Facility (MSF) within the City of Bellflower. A separate 4.5-mile segment is proposed from Slauson to Union Station, which will include 3 additional stations in the Art/Industrial District, Little Tokyo, and Union Station. Together, both segments make up the 19-mile Southeast Gateway Line providing a one-seat ride from Artesia to downtown Los Angeles.

1.1.1 Existing Railroad Right-of-Way

The SGL corridor is largely located within an existing Pacific Electric railroad right-of-way that is now owned by the Los Angeles County Metropolitan Transportation Authority (LACMTA). Most of the existing right-of-way was double track while in service, except for single-track bridges. The line was discontinued in 1958 and a Caltrans survey in 1981 reported that the SGL line had been reduced to a single track, with several at-grade crossings removed and in poor condition. Improvements along the existing railroad right-of-way, now owned by LACMTA, will be governed by Metro Rail Design Criteria (MRDC).

1.1.2 Existing City Right-of-Way

The SEG Line corridor traverses through Los Angeles, Huntington Park, Bell, Cudahy, Downey, South Gate, Paramount, Bellflower, Cerritos, Vernon, and Artesia. Those 11 cities plus the County of Los Angeles collectively are referred to in this report as the “SEG Line Cities.” The SEG Line Cities are served by seven major freeways and a grid of major arterial roads. Many of these roads include on-street parking, bus stops for local and regional transit operators, and an extensive network of bicycle and pedestrian facilities.

Most roadway intersections within the project area are controlled by traffic signals or stop signs. Many of the existing at-grade crossings that intersect the proposed LRT alignment are controlled by crossing gate arms or warning signs and this is where the project will interact most with the SEG Line Cities. Improvements within the existing SEG Line Cities right-of-way will be governed by a mix of design criteria from each city and the criteria within the MRDC.

1.2 Goal of Analysis

1.2.1 A Unified Design and Construction Standard

The Metro Office of the Inspector General (OIG) in its periodic audit of construction change orders of rail projects has discovered some inconsistencies between the MRDC and the design criteria of local agencies' having jurisdiction (AHJs) within Los Angeles County. A unified design and construction standard, conformed from the MRDC and the criteria of the SEG Line Cities would be valuable to guide the development of the SGL construction contract and improve project delivery.

1.2.2 Main Objectives

Metro's three main objectives for this task and our delivery approach are as follows:

Understand

- Gather the latest MRDC.
- Gather the SEG Line Cities design criteria.
- Analyze and understand the MRDC and SEG Line Cities design criteria.

Identify

- Identify the relevant design and construction criteria from the MRDC.
- Identify the appropriate SEG Line Cities design criteria for comparison.
- Evaluate the documents for variances.

Report

- Develop and populate a spreadsheet comparing the SEG Line Cities design criteria to the MRDC.
- Generate methodology to evaluate and resolve the discrepancies.
- Write a report summarizing findings and recommendations.

1.2.3 Delivery Approach

There is an immense amount of data in both the MRDC and the SEG Line Cities Criteria. Validating and comparing these data is a daunting task but having a unified design and construction standard is vital for the successful implementation of the SGL construction contract. The request from the OIG to the Mott MacDonald team was to perform the task at a high-level within a limited scope, schedule, and budget; therefore, our delivery approach matched this recommended level of effort accordingly and will serve as an initial study report to guide the future development of a unified design and construction standard.

Our team approach was to drill down into the most critical aspects of evaluating these various criteria. To analyze and **Understand** the MRDC, we started first by classifying the entirety of the MRDC into the following categories:

- Performance Criteria
- Prescriptive Criteria
- Standard Criteria

We then considered the most relevant scope of work to the SEG Line Cities; namely, that which occurs within each Cities right-of-way along the at-grade crossings of the LRT alignment. We then identified commonalities in the SEG Line Cities Criteria, which allowed our team to **Identify** the most relevant criteria to evaluate.

2 Outreach to SEG Line Cities

2.1 Metro OIG Outreach

Prior to starting analysis of the MRDC and SEG Line Cities criteria, Metro OIG reached out to each of the SEG Line Cities as well as Los Angeles County. The initial outreach between the SEG Line Cities and Los Angeles County gathered information through public record request. These requests generally inquired about city municipal standard criteria and requirements specifically related to rail design and construction, as well as other related design criteria necessary to obtain a permit for these public works. City responses were then collected and sent to Mott MacDonald along with a table summarizing all individual city responses to the initial information request.

After the initial outreach, responses were received from all cities except for Los Angeles and Paramount. For the city of Los Angeles, we were able to review criteria posted online. The cities that responded largely stated they did not have their own standards or criteria for most, if not all, items related to rail design and construction. Based on their responses, design and construction references were generally made to the *Standard Plans and Specifications for Public Works Construction* (the Greenbook), the *American Public Works Association (APWA)*, and Caltrans standards. The cities that responded with their own standards included Artesia, Downey, South Gate, and Vernon, as well as Los Angeles County. The standards provided from these cities, however, are not all encompassing and largely contain items that are either secondary or unrelated to rail design and construction.

2.1.1 Initial Approach

The initial approach of the Mott MacDonald team was to submit secondary information requests to the various cities without duplicating the initial effort from Metro OIG. Therefore, the team took note of the initial outreach efforts and submitted informal information requests to the Public Works and Engineering departments, instead of submitting formal public record requests through the City Clerk. This second round of requests ultimately resulted in similar responses to the efforts of Metro OIG or no response at all. For cities that did not respond, the team assumed the information initially provided to Metro OIG was all that was available.

2.1.2 Summary of Results

A summary of responses from the SEG Line Cities is provided below:

City of Artesia – The City of Artesia provided its Master Cooperative Agreement (MCA), which the City negotiated with Metro, the Artesia Active Transportation Plan, general plan bikeways and truck routes, and the following standard plans: Driveway, concrete sidewalk, backfill and asphalt pavement repair; and the following City municipal codes: lighting, fences walls and hedges, landscaping, open space and recreation (OS-R), and noise. Upon Mott MacDonald’s request for further information, Karen Lee (Special Projects Manager) stated the following: “The City negotiated with Metro in its Master Cooperative Agreement (MCA) that Metro would honor the specs resulting from the Artesia Downtown Specific Plan.”

City of Bell – The City of Bell stated that the City uses the Greenbook. Mott MacDonald attempted to contact the City through their online “Contact Us” form but received no response.

City of Bellflower – The City of Bellflower stated that the City has no records responsive to Metro OIG’s request. Mott MacDonald then reached out to the City of Bellflower’s Inspector,

Frank Preciado, who stated that the City has no standards aside from driveway aprons and that most things will fall under the Greenbook. He also mentioned that the City has a permit writer who has their own requirements.

City of Cerritos – The City of Cerritos stated that the City has no records in response to Metro OIG’s request and that they defer to the American Public Works Association (APWA) standard plan and specifications. Upon Mott MacDonald’s request for further information, the head of the City’s Engineering department stated that there were no standards for railroad crossings and would therefore require all rail projects to be reviewed and approved by the lead City engineer. However, as a general rule, rail works should meet Federal Highway Administration and Caltrans standards. All other standards and work should be referenced in the APWA Greenbook. One example was provided for a deviation to the above standards; standard water lid valves need to be made in Mexico or USA. Valves are not accepted if made in any other country. Additionally, the City has different preferred work hours depending on what part of the city construction will take place in. The following examples were provided: the City prefers work in industrial areas to be carried out in the day, work by the Cerritos Mall to be carried out at night except for Thanksgiving to mid-January where no construction is allowed near the mall.

City of Cudahy – The City of Cudahy stated that the City uses the Greenbook along with Caltrans standards and other construction codes as applicable (e.g., CAMUTCD). The City also stated that Public Works Permit Requirements include the following: completed Public Works Permit application (along with correspondent fees), project plan for proposed improvements, traffic control plan (stamped and signed by a registered Professional Civil Engineer in the State of California), contractor’s license, certificate of insurance, contractor’s worker comp, contractor’s business license, proof of coordination with utility companies and USA notification. Typical hours of operation for projects within the public right-of-way is 7am to 3pm. Aside from the listed items above, other requirements may also be required based on the proposed project and scope of work. Mott MacDonald attempted to contact the City of Cudahy through the Public Works Director, Aaron Hernandez, but received no response.

City of Downey – The City of Downey stated the following: “As a Public Works Department, we do not have standard criteria and requirements related to any rail design and construction, including those for tracks, stations, building access, grade crossings, fencing, duct banks, bridge supports, hauling, and earth monitoring.” The City did, however, provide standard plans for Sewer and Water as well as a standard drawings for residential driveways or parkways 10’ or more. Mott MacDonald was unable to contact the City of Downey through various email attempts as they were bounced back and labelled as spam by the City.

City of Huntington Park – The City of Huntington Park stated the City does not have its own City municipal standard criteria and requirements and therefore utilizes County standards. Mott MacDonald attempted to contact the City through their general contact email but received no response.

City of Los Angeles – The City of Los Angeles has a Master Cooperative Agreement (MCA) with Metro that outlines the roles and responsibilities for the design and delivery of transportation projects within the City limits. Relevant design criteria are also readily available online and has been summarized for each bureau within the Public Works department and the department of transportation below:

Bureau of Engineering

- Standard Plans
- Storm Drain Design Manual
- Architecture Manual
- Brown Book
- Street Design Manual
- Supplemental Street Design Guide
- Structural Design Manual
- Construction Manual
- Sewer Design Manual
- Survey Manual
- Special Orders
- Master Specifications Library

Bureau of Sanitation

- Low Impact Development (LID) Handbook

Bureau of Street Services

- Tree Spacing Guidelines
- Irrigation in the Public Right-of-Way
- Tree Planting Standard Plans

Bureau of Street Lighting

- Design Standards and Guidelines
- Blue Book

Los Angeles Department of Transportation

- Manual of Policies and Procedures
- Complete Streets Committee Policy and Design Guidance
- Supplemental Street Design Guidelines

City of Paramount – Metro OIG submitted an information request to the City of Paramount but had not received any information in return. Mott MacDonald sent a follow-up request for information to Adriana Figueroa with the City of Paramount who forwarded the request to Rafael Casillas from Willdan (the city’s contracted engineering firm). Willdan stated that anything that falls within the City right-of-way typically follows the Greenbook and that general work conditions, construction requirements, and similar can be found in the City municipal codes. However, there is no wide ruling for all areas throughout the City and standards and requirements will largely depend on the location within the City that the work is being performed in. Additionally, depending on the location of work, activities will be subjected to differing requirements based on whether they are distinguished as a betterment activity or a construction activity. The engineer made a final comment that Willdan is hesitant to provide wide-ranging requirements and standards because the City and Willdan assess every project and tailor it for the City.

City of South Gate – The City of South Gate stated that the City uses their own water and sewer standards, but follows Caltrans, Greenbook, and CAMUTCD standards for most other works. Mott MacDonald attempted to contact the Public Works department but received no response.

City of Vernon – The City of Vernon was not initially contacted by Metro OIG but MM submitted an information request through the City’s online portal, initially to the Director of Public Works and the Deputy Director. This request was forwarded to an engineering aide who directed MM to the Cities Standard Drawings online. Standard Drawings are available for the following items:

- Tree Planting Standard
- Standard Masonry Wall Barrier
- Standard Driveway
- Parkway Drains
- Curb Drains
- Manhole Drain and Cover
- Miscellaneous Curb
- Typical Trench Paving Section
- Standard Offset Requirements
- Standard Sidewalk Curb and Gutter
- Curb Ramps

Los Angeles County – Los Angeles County did not respond to Metro OIG’s information request. However, relevant design criteria and construction specifications available online were used by the Mott MacDonald team. These include:

- Los Angeles County Standard Plans
- Hydraulic Design Manual
- Structural Design Manual
- Low Impact Development Standards Manual

3 Identifying Variances

3.1 Classification of Criteria

To analyze and **Understand** the MRDC, the project team classified the MRDC into the following categories:

- Performance Criteria
- Prescriptive Criteria
- Standard Criteria

This allowed our team to **Identify** the most relevant criteria from the MRDC to evaluate against the SEG Line Cities criteria.

3.1.1 Performance Criteria

Performance criteria define functional characteristics of a final product based on the operational environment. It links these functional characteristics to construction, materials, and other items under contractor control. This definition from the Federal Highway Administration (FHWA) implies that without this link, performance criteria would not be under contractor control. As such, our project team used engineering judgement to assume most of the performance criteria within the MRDC that were not linked to prescriptive criteria would not conflict with criteria from the SEG Line Cities. An example of performance criteria from the MRDC without this link is as follows:

- *Existing building relationships, future joint developments, as well as neighborhood ethnic and cultural characteristics shall all be taken into consideration by the Designer when site planning.*

For existing building relationships, a link to more prescriptive criteria, like minimum setbacks, was not provided. Therefore, the judgement from the project team was there is no exception to the SEG Line Cities criteria. Put more broadly, the project team used this same judgement for all performance criteria that were not linked to numerical criteria or material specifications that are under contractor control.

3.1.2 Prescriptive Criteria

Prescriptive criteria give details about product materials and instructions to the contractor for their installation. An example of a prescriptive criteria is the second sentence in the criteria below:

- *Plaza area drainage shall be designed to minimize surface water level and velocity to maintain a safe walking surface. Minimum grade shall be 0.3 percent and maximum grade shall be 2.0 percent in open plaza areas.*

The first sentence provides expectations of the surface water level and the desired outcome of the walking surface, which is performance criteria. In contrast to the first example, this performance criteria is linked to numerical requirements that prescribe in detail how the walking surface in plaza areas should be designed, which is prescriptive criteria.

3.1.3 Standard Criteria

Standard criteria reference materials, products, or construction methods based on requirements from another reference standard. An example of standard criteria is provided below:

- *The design of curb cuts and ramps shall be in accordance with the applicable provisions of the Americans with Disabilities Act (ADA) and Title 24, California Code of Regulations Part 2, "Regulations for the Accommodation of the Disabled in Public Accommodations."*

The assumption from the Mott MacDonald team was the design and construction requirements from the SEG Line Cities would also adhere to these same reference standards. Evaluation of the numerous requirements that makeup the ADA and other standard criteria is also outside the scope of this high-level analysis.

3.2 Relevant Project Scope

Initial outreach by Metro OIG inquired about all city municipal standard criteria and requirements related to any rail design and construction; including tracks, stations, streets, landscape, utilities, sidewalks, grade crossings, right-of-way, fencing, asphalt, concrete, curbs, gutters, drainage, catch basins, duct banks, sewers, water, storm drain, bridge supports, work hours, working conditions, building access, hauling, earth monitoring, or other related specifications and requirements to obtain a permit.

3.2.1 Intersection Improvements

The Mott MacDonald team sought ways to narrow the scope of the analysis to focus on comparing the most relevant criteria; namely, the intersection improvements that occur within each City's right-of-way along the at-grade crossings of the LRT alignment. Typical improvements for these intersections are summarized as follows:

- Access Control
 - Active Warning Equipment
 - Medians and Channelization
 - Guardrails and Fencing
 - Traffic Signals
 - Track Circuitry and Signal Interconnects
 - Driveway relocations
- Approach Improvements
 - Bicycle/Pedestrian Improvements
 - Signage and Striping
 - Landscaping
 - Street Lighting
 - Bus stop relocations
 - Utility relocations
- Roadway Geometry
 - Horizontal alignment
 - Vertical profile
 - Curb bulb-outs
 - Dual curb ramps

Requirements for most of the above Civil scope of work are more specifically described within Section 3 of the MRDC. For items not addressed within Section 3, there are also references provided to Caltrans Standard Plans and Specifications, the American Association of State Highways and Transportation Officials (AASHTO) Policy on Geometric Design of Highways and Streets, the *Standard Plans and Specifications for Public Works Construction* (the Greenbook), amongst other relevant design requirements that form the basis of Section 3 of the MRDC. A thorough evaluation of the requirements within the MRDC against all the relevant design criteria for the intersection improvements is outside the scope of this analysis and additional means of narrowing the scope were pursued.

3.2.2 Greenbook

After gathering responses from the SEG Line Cities and collecting their design criteria, the Mott MacDonald team then identified commonalities amongst their responses. This provided an additional means of narrowing the focus of this analysis. The most common criteria referenced were the *Standard Specifications for Public Works Construction (the Greenbook)*, the *Standard Plans for Public Works Construction*, and the *LA County Standard Plans*. These collectively make up the “SEG Line Cities Criteria” for the purposes of this high-level analysis.

The Greenbook specifications largely include requirements for construction materials and methods and is thus difficult to compare against Metro Rail **Design** Criteria.

On the other hand, the Standard Plans for Public Works Construction and the LA County Standard Plans provide more relevant design criteria for comparison. More specifically, Section 100 includes design requirements for Street Improvements. The LA County Standard Plans are based on the Standard Plans for Public Works Construction and should serve as supplemental criteria. They are both structured in a similar manner and relevant criteria include Sewers and Sanitation, Flood Control and Storm Drain Facilities, Landscaping and Irrigation Systems, Street Lighting and Traffic Signals, and other General Facilities.

3.3 Analysis by Discipline

The MRDC is broken up into 12 sections, each covering differing criteria for the disciplines involved in the planning, design, construction, and operation of Metro facilities. There are many sections notably absent from the SEG Line Cities Criteria when comparing to the MRDC. These include Environmental Considerations, Guideway and Trackwork, Architectural, Mechanical, Electrical, Systems, Operations, Yards and Shops, and Safety Security Systems Assurance.

A matrix has been provided in Appendix A summarizing the analysis by discipline. The two dispositions used when evaluating the SEG Line Cities Criteria were either Exception (EX) or No Exception (NE). The EX disposition indicates a conflict between the individual MRDC specification and the SEG Line Cities Criteria. This means there was criteria for comparison but there was a difference in methodology, material specification, or some other relevant prescriptive criteria. The NE disposition indicates no conflict between the individual MRDC specification and the SEG Line Cities Criteria. That could mean alignment between the two criteria or no criteria for comparison. In the absence of any relevant design criteria from the SEG Line Cities, the design of these Metro facilities should be governed by the MRDC.

3.3.1 Environmental Considerations

Section 2 of the MRDC provides environmental compliance requirements during construction and operation of Metro projects. These include requirements for Traffic and Transportation, Land Use and Development, Urban Design, Noise and Vibration, Air Quality, Energy, Hazardous Materials, Hydrology, Biology, Cultural Resources, and Climate Change. Reference codes and standards for these requirements include California Green Building Standards Code and Metro Environmental Policy. Other requirements from Federal codes, ordinances, regulations, and applicable guidelines from the Federal Transit Administration (FTA) and American Public Transit Association (APTA) also apply. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the requirements for environmental compliance should be governed by the MRDC.

3.3.2 Civil

Section 3 of the MRDC provides criteria for the design of transit alignments, track subgrades, drainage systems, right-of-way clearances, access control, service roads, streets, parking facilities, site work, and utility relocations. Notable references that provide a basis for these criteria include the Manual of Uniform Traffic Control Devices (MUTCD), Caltrans Standard Plans & Specifications, Caltrans Highway Design Manual, and the AASHTO Policy on the Geometric Design of Highways and Streets. This section of the MRDC provides the most direct comparison of the SEG Line Cities Criteria.

3.3.2.1 Utilities

The utilities criteria provided in the MRDC pertain to the upkeep, rehabilitation, and establishment of utilities that may be impacted by the project's construction activities. In the performance of work, due consideration shall be given to the needs of the transit system, the requirements and obligations of the utility organizations, traffic requirements, and the cooperative agreements between the Agencies or Companies and Metro. This section of the MRDC is written as a supplement to the criteria and standards of local AHJs. This is evidenced by statements taking various forms in the following sections:

- General (3.3.1)
All designs involving maintenance, support, and relocation or other utility work shall conform

to the applicable specifications, criteria, and standard drawings of the concerned corporations or agencies.

- Sanitary Sewers and Storm Drains (3.3.2)

Design and construction of Sanitary Sewer laterals to abutting properties shall conform to City and County of Los Angeles requirements or other applicable local codes. All sanitary sewer and storm drain discharges for both operation and construction of the Metro Rail Transit (MRT) shall be properly permitted and compliant with appropriate jurisdictional authority.

Separation between sanitary sewers and water lines shall be per the applicable jurisdictional agency's design requirements. In general, maintain 10 feet minimum horizontal and 1-foot minimum vertical separation, or follow as required by the applicable jurisdictional agency's design requirements. The most stringent requirements shall apply.

- Water (3.3.3)

All maintenance, relocation, restoration, and construction of water mains and appurtenances shall conform to current design standards and criteria, specifications and practices of the agencies having jurisdiction

- Gas (3.3.4)

All work on, or adjacent to, gas lines shall conform to regulations and standards of The Gas Company.

- Electric Power (3.3.5)

All maintenance, relocation, and restoration of electric lines throughout the transit system shall conform to the current practices of the electric company involved, the requirements of the Electrical Code of the concerned jurisdictions and agencies, and the National Electrical Safety Code.

The preparation of designs shall be coordinated with and conform to design requirements of the electric utility company in whose jurisdiction the work occurs and coordinated with any other concerned governmental agencies.

- Telephone (3.3.6)

All maintenance, relocation, and restoration of telephone lines throughout the transit system shall conform to current practices of the appropriate telephone company.

- Telegraph Telecommunications (3.3.7)

All restoration of telegraph telecommunication lines shall conform to existing codes, plans, and standards of the local jurisdictional agency.

- Other Communication Cable Systems (3.3.8)

Designer shall verify ownership, and after consultation with the owners, shall perform the necessary design work in accordance with the approved codes and standards of the companies and agencies affected.

- Fire and Police Alarm Systems (3.3.9)

All work along the corridor will be performed by the respective owners of such systems or their designated representatives.

- Park Facilities (3.3.10)

All relocation and restoration of underground utility lines, water mains, sewers, drains, catch basins, sprinkler systems, lights, pavements, and other improvements within parks shall conform to requirements of the local authority's park and recreation departments involved.

- Street Lights (3.3.11)

All relocations, temporary or permanent, and restoration of existing street light facilities shall be in accordance with the practices and requirements of the local agency having jurisdiction, Local Electrical Codes, and the National Electrical Safety Codes.

• Traffic Signals (3.3.12)

All relocation, temporary or permanent, and restoration of these facilities shall be in accordance with the practices and requirements of the local jurisdiction. In addition, the Manual on Uniform Traffic Control devices shall be followed. Local ordinances include the municipal codes and standard plans of all jurisdictions, and the following reference: City of Los Angeles Special Provisions and Standard Drawings for Installation and Modification of Traffic Signals.

• Oil Pipe Lines, and Steam Lines (3.3.13)

All oil transmission lines and steam lines belonging to private companies shall be relocated clear of the project site. All work shall be performed by the owner of said installation.

• Abandoned Utilities (3.3.14)

Abandoned Utilities within the limits of excavation shall be cut and removed. Cut ends shall be plugged or capped. Abandoned lines larger than 15 inches in diameter remaining within the right-of-way shall be backfilled with sand, one sack cement slurry or controlled low strength material (CLSM).

Pipes under railroad tracks is a key design element which was not found in the design criteria of the SEG Line Cities. **Figure 3.22**, as shown below, of the MRDC specifically states the design criteria. For any pipes under railroad tracks, this design criteria shall govern.

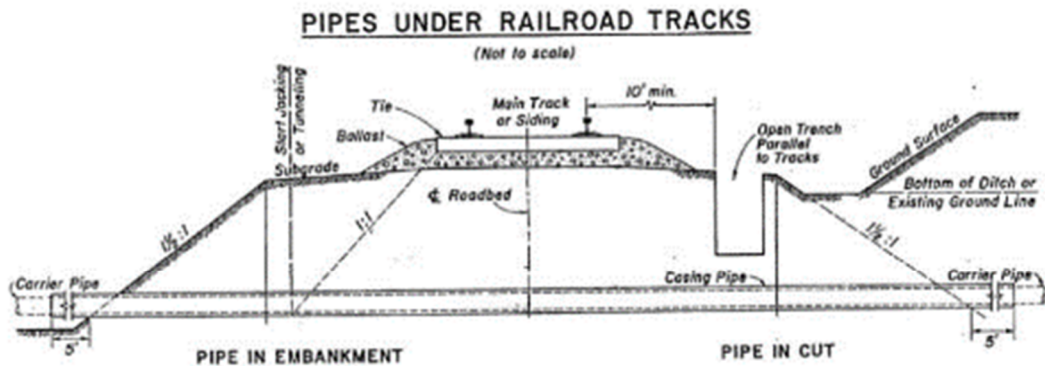
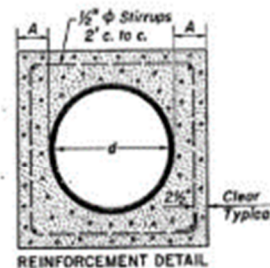


TABLE I
THICKNESS OF PIPE CASINGS FOR SUPPORTING TRACK

Inside Diameter Inches	Corrugated Iron Pipe U.S. Std. Gage No.	Smooth Steel Pipe Min. Thick. Inches
4 to 10	14	1/2
12	14	3/8
15, 18	14	1/2
21, 24	12	1/2
30, 36	10	3/4
48, 54, 60	8	

TABLE II
CONCRETE ENCASEMENT FOR PIPES

d Inches	A Inches	Number of Longitudinal 1/2" Φ Bars
10, 12	4	4
15	5	4
18	5	8
21, 24, 27	6	8
30	7	12
33	8	12
36	9	12



NOTES

- Force mains crossing main tracks and sidings shall be installed in pipe casings as per Table I.
- Gravity drains crossing tracks do not require pipe casings. If concrete encasement is required for structural purposes, see Table II and detail above.
- Casing may be corrugated iron, smooth steel, or concrete. Inside diameter of casing shall be at least 2" larger than outside diameter of carrier pipe and shall slope toward one end. See Table I.
- Cast iron carrier pipe used without a casing shall be at least class 150 or equivalent.

3.3.2.2 Right-of-way and Control of Access

The criteria in Sections 3.4 of the MRDC pertain to the composite total requirement of all interests and uses of real property needed to construct, maintain, protect, and operate the LACMTA system. This criterion is specific to the preferences of LACMTA and there are few, if any, comparable requirements from the SEG Line Cities. In the absence of such criteria, the requirements for right-of-way and control of access should be governed by the MRDC.

3.3.2.3 Streets

The criteria in Section 3.7 of the MRDC includes requirements for the design of publicly maintained facilities, including streets, sidewalks, driveways, bus pads, traffic signs, parking meters, and landscaping. Excerpts of notable criteria requiring further discussion and analysis are included in the following sections:

- Roadway Geometrics (3.7.3)

B. Traffic Lane Widths

The following criteria indicate the optimum traffic lane widths.

CASE	DESIRABLE	MINIMUM
Left Edge Line	2' from C&G	1' from C&G
Right Edge Line	2' 8" from Pvmt. Edge	1' from Pvmt. Edge
Interior thru lane 35mph & below	11' (10')	10' (9')
Interior thru lane 40mph & above	12' (10-11')	11' (10')
Interior thru lane with high truck or bus volume	12' (11')	11' (10')
Interior thru lane adjacent to bike lane	12' (11')	11' (10.5')
Left turn lane	12'	10' (10')
2-way left turn lane	12' (10')	10' (9')
Curb lane-No Parking	13' (11-13')	10'
Curb lane with parking	19' – 26'	18'

The above table is an outdated reference of the City of Los Angeles, Department of Transportation, Manual of Policies and Procedures, Section 531: Application and Design for Striping, Channelization, and Special Signing. The updated values as of 06/23/22 are shown in red for comparison. The MRDC in this case is requiring more stringent design criteria than local agencies having jurisdiction.

C. Number of Traffic Lanes

The lane configuration and signal timings shall, whenever possible, be designed to provide no worse than level of service D at signalized intersections in the P.M. peak hour during at least the year following completion of this project.

In 2013, the State of California passed Senate Bill (SB) 743, which mandates that jurisdictions can no longer use automobile delay in transportation analysis, commonly measured by Level of Service (LOS), under the California Environmental Quality Act (CEQA). The State has issued guidelines calling for the use of a broader measure called Vehicle Miles Traveled (VMT).

E. Curb Return Radii

<i>City of Los Angeles</i>	<i>25'</i>
<i>Los Angeles Co. Master Plan Hwy.</i>	<i>35'</i>
<i>Other Los Angeles Co.</i>	<i>25'</i>

The City of Los Angeles Supplemental Street Design Guide includes additional guidelines for the determination of minimum curb return radii. These include consideration of the street classification, design vehicle, and design speed. There is also discussion on the difference between effective turning radius that allows for smaller curb return radii.

F. Cross Slopes

<i>Concrete and Asphalt Pavement</i>	<i>2%</i>
<i>Aggregate Surface Pavement</i>	<i>3%</i>
<i>Parking Areas</i>	<i>1% min.</i>
	<i>6% max.</i>

The above values for concrete, asphalt, and aggregate pavements, while typical, are not always the minimum. The Highway Design Manual specifies the following: For resurfacing or widening (only when necessary to match existing cross slope), the minimum shall be 1.5 percent and the maximum shall be 3 percent.

For parking areas, Los Angeles Municipal Code (LAMC) 12.21A5 specifies a maximum 6.67% slope in any one direction for parking stalls.

G. Sidewalks

Minimum slope shall be 0.5%

The Los Angeles Bureau of Engineering (LABOE) Street Design Manual, Part E, specifies the following: The transverse slope, which is normally set at 2.5% percent, should direct drainage from the property line toward the roadway. The maximum transverse sidewalk slope permitted is 6% and the minimum is 1%.

The LAOBE standard plans S-444-0 specifies the following: The maximum sidewalk grade including the ¼-inch construction tolerance, is 2%. The minimum sidewalk grade including the ¼-inch construction tolerance, is 0.5%.

- Traffic Control Devices (3.7.7)

D. Design Guidelines

Type 170 controllers shall be utilized throughout the system unless otherwise required by local jurisdiction.

The LADOT Special Provisions and Standard Drawings for the Installation and Modification of Traffic Signals (Redbook), specifies the following: The contractor-supplied controllers shall conform to the latest LADOT material specification and addendum for the Model 2070 controller assembly, with either Type 332 or 337 cabinet as shown on the traffic signal plan, and all auxiliary equipment required to provide a complete functioning controller per LADOT Specifications 054-053-07.

- Landscape Areas and Street Trees (3.7.15)

- A. General

- Subject to local jurisdiction approval, street trees may be replaced on and two-for-one basis with 36" box standard.*

On May 22, 2019, the City Council adopted as amended the Board of Public Works' (Board) proposed establishment of a Tree Replacement Guarantee (In-Lieu) Fee (Non- Refundable Deposit) to provide development and residential projects an additional permit option to satisfy the Department of Public Works' Tree Replacement Policy of "2 x 1" or "4X1" ratio (Tree Replacement: Tree Removal).

3.3.3 Guideway and Trackwork

Section 4 of the MRDC provides design criteria for clearance requirements, fencing, signage, horizontal and vertical track geometry, LRT grade crossings, and trackwork. The basis of this criteria are requirements from the California Public Utilities Commission (CPUC), recommendations from the American Railway Engineering and Maintenance Association (AREMA), and other requirements from Federal, State, and local jurisdictions. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the guideway and trackwork design should be governed by the MRDC.

3.3.4 Structural and Geotechnical

The structural and geotechnical review undertaken focused on high-level review of Chapter 5 of the MRDC. Chapter 5 of the MRDC serves as a set of design criteria for structural and geotechnical components. Where appropriate, the MRDC refers to typical American Industry Standards such as AASTHO Load and Resistance Factor Design (LRFD), AASHTO Tunnel, International Building Code (IBC), ASCE 7 etc.

The Greenbook details structural and geotechnical construction specifications. This differs from the MRDC which is a design criteria manual. There are no expected variances with respect to geotechnical/structural design as the two documents have different purposes. Accordingly, the review undertaken focuses on any other variances between the MRDC and other typically used design criteria's (IBC/California Building Code (CBC), ASCE 7, AASHTO etc.) that any of the AHJs may incorporate.

Given the limited scope of this review, only a few variances were identified. These variances are based on a review of the MRDC and experience on other LACMTA projects:

- The structural load combinations specified in MRDC are based on AASHTO LRFD and Tunnel. These conflict with load combinations specified in the IBC/CBC with combinations on the MRDC generally being more stringent.
- For seismic design, the MRDC considers a 2-level approach; the Maximum Design Earthquake (MDE) and the Ordinary Design Earthquake (ODE) which correspond to event return periods of 2500 years and 150 years respectively. Each level has different performance requirements; life safety and collapse prevention for MDE and immediate return to service for ODE. The building code (IBC/CBC) considers a single event, the Design Basis Earthquake (DBE) which is equal to 2/3 the Maximum Credible Earthquake (return period of 2475 years).
- Each return period is associated with a different level of probabilistic ground motions. In general, the MRDC requires all surface structures (other than bridges) to be designed to IBC/CBC DBE level motions. In some instances, the MRDC (cl 5.5.3) requires these surface

structures to be designed considering ODE and MDE actions rather than DBE and may lead to overly onerous structural design.

3.3.5 Architectural

Section 6 of the MRDC provides architectural requirements and specifications for Metro rail stations and facilities. Requirements related to Metro's stations include area requirements, design of platforms, amenities, artwork, signage, advertising, landscaping, platform access, and guidelines for the selection of materials and finishes. Also included are the General guidelines for the design of Kiss and Ride/Park and Ride facilities, station, and ancillary facilities.

Building codes, regulations and criteria relevant to Metro Rail stations and facilities include FTA Access Board's Americans with Disabilities Act Accessibility Guidelines (ADAAG), California CCR Title 8, 19, 24, American National Standards Institute, Inc. (ANSI), California Building Code, LA City Building Code and Fire Code, LA County Building Code and Fire Code, and NFPA 101 and 130. Other guidelines included in the Architectural section pertain to station uniformity across all Metro Rail Stations related to station control, advertising, signage, and artwork. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the architectural design should be governed by the MRDC.

3.3.6 Electrical

Section 7 of the MRDC provides requirements for the design of electrical systems in fixed facilities for Metro Heavy and Light Rail Transit systems, including, but not limited to, underground structures, tunnels, at-grade and elevated structures. Electrical system design also includes guideways, train control signal houses/bungalows, and enclosures, parking structures, and parking lots, but excludes electrical traction power for the operation of the train. The aim for the analysis was to identify key design variances between the MRDC and the SEG Line Cities Criteria. In the absence of relevant design criteria from the SEG Line Cities, the design for electrical systems in fixed facilities for Metro Heavy and Light Rail Transit shall be governed by the MRDC.

3.3.7 Mechanical

Section 8 of the MRDC provides design criteria for the design of heating, ventilating, and air-conditioning (HVAC) systems for both above ground and underground stations and tunnels. These include systems for platform exhaust, concourse exhaust, emergency ventilation, and HVAC systems for ancillary spaces. Typical application of these systems in enclosed stations or tunnels are largely governed by local and state building codes, mechanical codes, plumbing codes, and fire codes. In the absence of any City, County, or State code, other national codes from the American National Standards Institute, the American Society of Testing and Materials, or the National Fire Protection Association should be followed. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the mechanical design should be governed by the MRDC.

3.3.8 System

Section 9 of the MRDC provides design criteria for the design of systems for rail operations, including fair collection, train control, communications, security, emergency detection, and traction power distribution. Typical application of these systems are largely governed by local and state building codes, mechanical codes, plumbing codes, and fire codes. In the absence of any City, County, or State code, other national codes from the American National Standards Institute, the American Society of Testing and Materials, or the National Fire Protection

Association should be followed. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the systems design should be governed by the MRDC.

3.3.9 Operations

Section 10 of the MRDC provides design criteria for the design of basic systemwide operating and maintenance criteria established for LACMTA projects. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the operations design should be governed by the MRDC.

3.3.10 Yards and Shops

Section 11 of the MRDC provides design criteria for the design of rail operations for a particular rail line or as a systemwide facility. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the yards and shops design should be governed by the MRDC.

3.3.11 Safety Security Systems Assurance

Section 12 of the MRDC provides design criteria for the design of safety, systems assurance, and security issues. There are few, if any, comparable requirements from the SEG Line Cities Criteria for this high-level analysis. In the absence of such criteria, the safety security systems assurance design should be governed by the MRDC.

4 Conclusions

The Metro OIG in its periodic audit of construction change orders of rail projects has discovered some inconsistencies between the MRDC and the design criteria of local AHJs. A unified design and construction standard, conformed from the MRDC and the criteria of the SEG Line Cities would be valuable to guide the development of the SGL construction contract and improve project delivery. The request from the OIG to the Mott MacDonald team was to perform the task at a high-level within a limited scope, schedule, and budget; therefore, our delivery approach matched this recommended level of effort accordingly and will serve as an initial study report to guide the future development of a unified design and construction standard.

4.1 General Alignment with SEG Line Cities Criteria

After review of the available documents for comparison and a high-level evaluation of these documents, the Mott MacDonald team provides the following insight.

- In general, the MRDC is in alignment with the available documents that make up the SEG Line Cities' Criteria, which will govern the construction of the SGL light-rail project.
- The variances identified through this exercise are limited and if further detailed evaluation were to be performed, the variances would likely remain below 1%.

It should be noted that the MRDC is clearly written with the intent of avoiding conflicts with the criteria from local AHJs. This is evidenced by numerous instances within the MRDC stating the design shall conform to the requirements of the local AHJ and adhere to the most stringent criteria when there is a conflict with the MRDC. The MRDC thus serves as a supplement to the requirements of the local AHJ when none are provided.

4.2 Conflicting Criteria

Our high-level analysis identified many parts of the MRDC that are not addressed within the SEG Line Cities Criteria and in the absence of such criteria, the requirements within the MRDC should govern. Notable conflicts with relevant criteria to the SEG Line Cities have been included in Part 3 of this report. The MRDC provides clear instruction about how to resolve these conflicts, although the inclusion of outdated criteria may cause confusion to designers that results in costly change orders for LACMTA projects.

4.3 Overly Stringent Criteria

The resolution of conflicting requirements within the MRDC with the SEG Line Cities Criteria can also result in overly stringent criteria. This occurs because the MRDC requires conformance with the most stringent criteria when there is a conflict, which is a conservative approach that provides clear guidance on how to resolve conflicts. Here again, the inclusion of outdated criteria in the MRDC has resulted in more stringent criteria than local AHJs, as shown in Part 3 of this report, with cost implications for LACMTA projects.

5 Recommendations

The MRDC includes excerpts of criteria that were the basis for development of the MRDC. These excerpts are helpful guidance when no criteria exist from the SEG Line Cities. Unfortunately, the criteria within the MRDC have not been updated at the same frequency as criteria from the SEG Line Cities. This has resulted in the inclusion of outdated criteria within the MRDC that conflicts or provides more stringent criteria than the SEG Line Cities. Both outcomes have cost implications for LACMTA projects.

5.1 Update Excerpts of Reference Criteria

The Mott MacDonald team recommends that outdated excerpts of criteria be updated and to include references to the governing criteria that form the basis of the MRDC. Currently, most sections within the MRDC include a list of references that are the basis of the criteria but there is no link to these references and the body of the MRDC that contains the criteria itself. This leaves no way to determine what reference is the basis of individual criteria. Cues could be taken from academic research papers that provide MLA type references within the body of a report with an accompanying bibliography. It should be clearly noted that newer versions of the reference criteria, published prior to the start of notice to proceed (NTP) with final design, shall govern. Any updates to referenced criteria after NTP should be discussed with LACMTA.

5.2 Link Performance Criteria to Prescriptive Criteria

The Mott MacDonald team also recommends linking performance criteria to prescriptive criteria. A good example of this are the requirements within the MRDC related to curb return radii, shown in Part E of Section 3.7.3 below:

E. Curb Return Radii

<i>City of Los Angeles</i>	25'
<i>Los Angeles Co. Master Plan Hwy.</i>	35'
<i>Other Los Angeles Co.</i>	25'

In this case, geometric considerations, like road classification, the governing design vehicle, or the design speed, and other performance criteria like site characteristics are provided in Part A and might be overlooked when applying the requirements in Part E.

5.3 A Unified Design and Construction Standard

Ultimately, the resolution of conflicting and overly stringent criteria will require a unified design and construction standard, conformed from the MRDC and the SEG Line Cities Criteria. The analysis by the Mott MacDonald team should serve as an initial study report to guide the future development of this standard as revision and amendments to the MRDC will require further analysis. The MRDC update and adoption needs to align closely with the SEG Line Cities Criteria and Metro will need to establish an acceptable revision and adoption schedule of the MRDC prior to issuance of the final design and construction contract of the SGL project.

6 Discussion

6.1 Governance and Project Delivery

Ideally, the SGL project delivered under an updated MRDC should meet nearly all the technical design criteria of the SEG Line Cities; therefore, this provides an opportunity for Metro to explore different governance models. The City of Los Angeles currently has a Master Cooperative Agreement with Metro that could serve as a model for agreements with the SEG Line Cities. “The MCA is intended to establish City and LACMTA obligations, roles and responsibilities, and processes and procedures to support the efficient, timely and safe delivery of LACMTA’s Transportation Projects.” The MCA with the City of Los Angeles also establishes a “Special Permitting Process” that is utilized to, “expedite City’s review of work performed by LACMTA in the public rights-of-way.” More progressive MCAs with the SEG Line Cities could consider self-permitting when there is significant agreement between the MRDC and the criteria from local AHJs. This would help streamline jurisdictional coordination and ensure all stakeholders work effectively to deliver projects successfully. SEG Line Cities would still maintain a primary role in the enforcement of environmental regulations, like limitations on noise, access control, and work hour restrictions.

6.2 Self-permitting Authority

Transit agencies like Metro often seek self-governance because permitting requirements from local AHJs introduce additional costs and schedule delays. In a recent memo to the Sound Transit Executive Committee in Seattle, a Technical Advisory Group noted that AHJs use the entitlement and permitting process to require improvements beyond the core project scope and sometimes beyond what appears to be reasonable. As the permitting process takes place through the final design and construction phases, the specific issues that arise from more detailed designs submitted for permit cannot always be known at the time of environmental review or even at the Project Baseline milestone. In these circumstances, project teams find themselves in a position where if permit design information does not include an AHJ’s desired request, submittals may not be accepted. These betterment requests are often contentious and policy on scope control and escalation paths when disagreements occur are often unclear or applied inconsistently across projects. What is clear is that AHJs are granted deference in interpreting their own codes and the burden is on transit agencies to prove otherwise.⁰¹

Any future MCAs between LCMTA and the SEG Line Cities should consider self-permitting for those items that are consistent, without exception, between the MRDC and the criteria of local AHJ’s. Discussion and resolution of betterment requests should be negotiated up front and with more equal bargaining power. This approach would still involve AHJ outreach and participation from community stakeholders to ensure public support and commercial awareness of impacts to local businesses. A unified design and construction standard between the MRDC and the criteria of the SEG Line Cities has the potential to streamline jurisdictional coordination and ensure all stakeholders work effectively to deliver projects successfully.

01 Moises Gutierrez, Regarding TAG Recommendation #5: Strengthen and enforce an agency betterment policy, Sound Transit Authority, 2024

Appendix A1

Disclaimer: 1. See companion report explaining methodology for comparison of relevant criteria
 2. For the purposes of this high-level analysis, the "SEG Line Cities" criteria includes the Standard Specifications for Public Works Construction (Greenbook), the Standard Plans for Public Works Construction, and the Los Angeles County Standard Plans
 3. All performance criteria within the MRDC that were not linked to prescriptive criteria within contractor control (i.e. containing numerical measurements or material specifications) were assumed to have no conflict with SEG Line Cities Criteria

METRO RAIL DESIGN CRITERIA				SEG LINE CITIES											Specs & Plans	
ID	TYPE	SECTION	DESCRIPTION	No Exception= NE Exception = EX											VARIANCE	DOCUMENT/SECTION
				LOS ANGELES	HUNTINGTON PARK	BELL	CUDAHY	DOWNEY	SOUTH GATE	PARAMOUNT	BELLFLOWER	CERITOS	ARTESIA	VERNON		
333	Prescriptive Spec		Curb Return Radius: City of Los Angeles - 25'	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
334	Prescriptive Spec		Curb Return Radius: Los Angeles Co. Master Plan Highway - 35'	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
335	Prescriptive Spec		Curb Return Radius: Other Los Angeles County - 25'	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
336	Prescriptive Spec		Curb Return Radius: Parking areas - 15'	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
337	Prescriptive Spec		Cross Slope: Concrete and asphalt concrete pavement roads: 2%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
338	Prescriptive Spec		Cross Slope: Aggregate surface pavement: 3%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
339	Prescriptive Spec		Cross Slope: Concrete and asphalt concrete pavement roads: 2%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
340	Prescriptive Spec		Close Slope Parking areas: 1% min. 6% Max.	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
342	Prescriptive Spec		Sidewalk: Minimum slopes shall be 0.5%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
388	Prescriptive Spec	1	Subject to local jurisdiction approval, street trees may be replaced on and one-for-one basis with 36" box standard. The tree species shall be designated by the local jurisdiction. Tree location shall be coordinated with the location of other sidewalk features, such as streetlights, fire hydrants, station appurtenances, and underground utilities and basements.	EX												Los Angeles: BSS
400	Prescriptive Spec		Main storm drains	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
401	Prescriptive Spec		Parking lots	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
402	Prescriptive Spec		All longitudinal drains or subdrains that could flood the roadbed	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
405	Prescriptive Spec		All other areas	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
412	Prescriptive Spec		Subdrains: -0.5%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
413	Prescriptive Spec		Laterals: -0.5%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
414	Prescriptive Spec		Main Collectors: -0.5%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
415	Prescriptive Spec		Ditches: -0.5%	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
421	Prescriptive Spec	2	Materials: All underground storm drains shall be reinforced concrete pipe (RCP). RCP located in track R.O.W. shall be provided with cathodic protection as necessary. High Density Polyethylene Pipe (HDPE) and Polyvinyl Chloride Pipe (PVC) may be used where its use is approved by the governing agency. Drain connections in structural walls and floors shall be Ductile Iron Pipe (DIP). Steel pipe shall not be used in the permanent underground drainage system.	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX		
450	Standard Criteria	D3b	Parallel-to-Curb Bus Bays: Parallel to curb base shall have 10-foot-widelanes and a length of 80 feet.	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	•LA - Bus pad length 120', B4807 •All other cities = greenbook, Length = 85'	LA city std plans greenbook
476	Standard Criteria	F	Curb Returns Parking Lots and Areas 1. For cabs, 20 feet (Inside Radius) 2. For buses, 30 feet minimum (inside radius), 50 foot minimum (outside radius clear). 3. For passenger cars 15.3 feet minimum (inside radius), 25.8' minimum (outside radius clear).	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	EX	LA City Complete streets Guide Bus/Transit = 25' LA County Std 1130-1 = 17' min	

Appendix A2

METRO RAIL DESIGN CRITERIA				SEG LINE CITIES											Specs & Plans		
ID	TYPE	SECTION	DESCRIPTION	No Exception= NE Exception = EX											VARIANCE	DOCUMENT/SECTION	
				LOS ANGELES	HUNTINGTON PARK	BELL	CUDAHY	DOWNEY	SOUTH GATE	PARAMOUNT	BELLFLOWER	CERITOS	ARTESIA	VERNON			
142	Prescriptive Spec		For all normal operating conditions for escalators and elevators located in public areas, the source noise level at 3 feet from the equipment shall not exceed 55 dBA Lmax for steady-state noise, and transient noise shall not exceed 60 dBA Lmax as measured using the fast meter response.														
143	Prescriptive Spec		<u>Escalators</u> . Noise produced by escalators operating individually in either direction under no load and maximum load in the station environment shall not exceed 55 dBA Lmax 5 feet above the tread at the entrance combs at both ends of the escalator.														
		2.8	AIR QUALITY														
144	Performance Criteria			NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		2.9	ENERGY														
		2.10	SURFACE AND SUBSURFACE CONDITIONS AND HAZARDOUS MATERIALS														
		2.11	HYDROLOGY, WATER QUALITY, AND WATER EFFICIENCY														
		2.12	BIOLOGICAL														
		2.13	CULTURAL RESOURCES														
		2.14	CLIMATE CHANGE AND ADAPTATION														
		3	CIVIL														
		3.3	UTILITIES														
		3.3.1	GENERAL														
145	Performance Criteria	3.3.1.A	These criteria govern the maintenance, support, restoration, and construction of utilities encountered by, or affected by, the construction. In the performance of work, due consideration shall be given to the needs of the transit system, the requirements and obligations of the utility organizations, traffic requirements, and the cooperative agreements between the Agencies or Companies and Metro.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
146	Definition	3.3.1.A.1	Utilities comprise facilities belonging to governmental agencies other than Metro, Public Utility Corporations, and private parties, and include service lines to adjoining properties.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
147	Definition	3.3.1.A.2	Utilities encountered or close enough to be affected by transit construction may be:	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
148	Performance Criteria	3.3.1.A.2.a	Supported and maintained complete in place during construction and continued in service following completion of the transit facilities.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
149	Performance Criteria	3.3.1.A.2.b	Temporarily relocated and maintained; then, upon completion of transit facilities, replaced by new utilities.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
150	Performance Criteria	3.3.1.A.2.c	Permanently relocated beyond the immediate limits of transit construction.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
147	Performance Criteria	3.3.1.B	Utility service to abutting properties shall not be interrupted and, if temporarily relocated, shall be permanently restored to its prior location upon completion of work.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
148	Performance Criteria	3.3.1.C	Replacements for any existing utilities, including government facilities, and pavements shall be designed to provide service or capacity equal to that offered by the existing installations. Designer shall comply with local codes and standards of the agencies having jurisdiction. Unless specifically noted otherwise herein, the latest edition of the code, regulation, standard and standard plan that is applicable at the time the design is initiated, not when the bid is submitted nor the contract sign date shall be used. If a new edition or amendment to a code, regulation, standard or standard plan is issued before the design is completed, the Designer shall determine the impact of the change and seek Metro direction on how to proceed. Designer shall request Metro direction on current minimum standards to be used for design of replacement facilities.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
149	Performance Criteria	3.3.1.D	Improvements to utilities shall not be included unless specifically directed by Metro	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
150	Performance Criteria	3.3.1.E	All designs involving maintenance, support, and relocation or other utility work shall conform to the applicable specifications, criteria, and standard drawings of the concerned corporations or agencies.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
151	Performance Criteria	3.3.1.F	Record elevations of all utilities shall be adjusted to project datum. Pertinent utility elevations and locations shall be checked by field survey, and, where critical to design, by digging test holes at locations approved by Metro. Designer shall request Metro direction on current minimum standards to be used for design of replacement facilities, and have direction and concurrence of the utility or agency affected.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
152	Performance Criteria	3.3.1.G	The Designer shall consider plans developed, or being developed, by others in adjoining sections to ensure that the overall utilities systems will be consistent with those existing before the start of construction, and that the systems will be compatible with those of the transit system.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
153	Performance Criteria	3.3.1.H	Design of utility rearrangements shall ensure that construction of the transit facilities may proceed without undue hindrance and without endangering the continuity of utility service. The design shall consider space requirements for equipment and materials and clearances for installation of temporary traffic decking. The Designer shall request direction from Metro on allowable profiles and clearances for temporary deck structures. Design practice for a normal width underground station is to provide minimum clearance of 54 inches between top of temporary decking and the top of the relocated utility profile. These clearances may vary with the length of span required.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
154	Performance Criteria	3.3.1.I	Take into account the needs of each utility for maintenance and accessibility when assigning vertical alignments.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:
155	Performance Criteria	3.3.1.J	Where utilities cross under or run parallel to rail alignments consider live loads imposed by transit facilities in design of utility and utility casings (See Figure 3.22). Protection of both the utility and the transit facility must be considered	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			City of LA: Artesia:

METRO RAIL DESIGN CRITERIA				SEG LINE CITIES												Specs & Plans
ID	TYPE	SECTION	DESCRIPTION	LOS ANGELES	HUNTINGTON PARK	BELL	CUDAHY	DOWNEY	SOUTH GATE	PARAMOUNT	BELLFLOWER	CERITOS	ARTESIA	VERNON	VARIANCE	DOCUMENT/SECTION
				No Exception= NE Exception = EX												
		C	Walkways													
1887	Performance Criteria	C1	Isolated and remote or hidden pedestrian walkways shall be avoided.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1888	Performance Criteria	C2	Effective width of exterior walks equals total width minus obstacles. An additional 1'-0" foot fringe area per side shall be subtracted.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1889	Performance Criteria	C3	Walks shall have a continuous surface.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1890	Standard Criteria	C4	Walkways crossing rail tracks to reach station platform shall be level and flush with the top of rail at the outer edge and between rails, except for a maximum 2-1/2" gap on the inner edge of each rail to permit passage of wheel flanges. Such crosswalks shall be defined by a continuous detectable warning strip 36" wide in the direction of travel and in compliance with ADAAG Section 705, Detectable Warnings and 406, Curb Ramps, and Title 24 (CCR)	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1891	Prescriptive Spec	C5	The boundary between the areas shall be bounded by a continuous detectable warning strip which is 36" wide in the direction of travel.													
1892	Prescriptive Spec	C6	The recommended width of pedestrian walkways shall be as follows: - Walkways over tracks: 15'-0" (preferred), 10'-0" minimum - Walkways through bus stop areas: 12'-0" (preferred), 8'-0" minimum - Walkways adjacent to long-term parallel parking: 8'-0" (preferred), 6'-0" minimum - Walkways adjacent to short-term parallel parking: 10'-0" (preferred), 8'-0" minimum - Crosswalks: 12'-0" (preferred), 10'-0" minimum													
1893	Performance Criteria	C7	Warning signs or signals shall be provided on Pedestrian gates at crossings of light rail and/or railroad tracks, as well as adjacent roadways in accordance with Traffic Control section of this criteria.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
		A	General													
1894	Performance Criteria		In all cases, bicycle access shall be as direct and safe as possible.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1895	Performance Criteria	A1	Provisions shall be made for access to and from stations by bicycle parking, wayfinding signage within Metro property, and other facility design elements at station sites.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
		B	Bicycle Parking													
1896	Performance Criteria	B1	Bicycle parking shall consist of the following:	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1897	Performance Criteria	B1a	Short-term Parking - An inverted-U bicycle rack that allows 2 bicycles to be securely affixed to the rack.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1898	Performance Criteria	B1b	Long-term (paid-secure) bicycle parking - requires a fee payment. Two types of paid-secure bike parking are:	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1899	Performance Criteria	B1b1	A bicycle locker allows for the secure-access and storage of a single bicycle to one or more registered users at one time. The standard bicycle locker material and finish shall be stainless steel with 50% openness.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1900		B1b2	Metro Bike Hub - access is granted to registered users.													
1901	Performance Criteria	B1c	Smart bike parking systems and solutions that offer more security options than short-term bike racks but require less space than bike lockers may be proposed and considered.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1902	Performance Criteria	B1d	Bicycle Parking Baseline Specifications - Refer to Metro Systemwide Baseline Section 12.93.12 for specifications for Bicycle Lockers and Racks and Enclosed Bike Parking.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1903	Performance Criteria	B1e	Bike Module Floor Plan - Refer to AS-013 Standard Drawing for space requirements when designing bicycle parking facilities.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1904	Performance Criteria	B2	Required number of Bicycle Parking Spaces: For each station, bicycle parking spaces shall be provided for current/operating year, as defined in the project environmental analyses for both short-term and long-term (paid secure) bike parking.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1905	Performance Criteria	B2a	Formula and guidance shall be used:	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1906	Performance Criteria	B2a1	Formula to determine Total Required Bicycle Parking Spaces: Number of total bike parking spaces shall equal peak period boardings multiplied by bicycle access mode share.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1907	Performance Criteria	B2a1a	Peak period boardings: Projected three-hour AM (6-9) or four-hour PM (3-7) peak boarding, whichever is larger	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1908	Performance Criteria	B2a1b	Bicycle access mode share (%): 2.5% for current/operating year demand and 4% of Future demand.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1909	Performance Criteria	B2a1c	Alternative bike parking demand supported by station site-specific analyses and supplemented by community input while meeting minimum quantity.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
		A	General													
1910	Performance Criteria	A1	Entrances to sites shall be from secondary roads where possible, with provision for queuing space provided at their intersections with arterial roads.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
1911	Prescriptive Spec	A2	Separate access points into the site from the same street shall be at least 150 feet apart.													
1912	Performance Criteria	A3	Use of residential streets for entrance sites shall be avoided if possible. If residential streets must be designated as access roads, provisions must be made to mitigate impact to local residential traffic patterns.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
		B	Separation of Access Modes													
1913	Performance Criteria		Separation of vehicular modes of access shall be provided whenever possible due to the differing circulation needs and priorities assigned to buses, Kiss-and-Ride, and Park-and-Ride.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
		A	General													
1914			Uses shall be given priority in terms of vehicular access.													
		B	Separation of Access Modes													

METRO RAIL DESIGN CRITERIA				SEG LINE CITIES											Specs & Plans		
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		9.4.6.5.3	LOCAL CONTROL														
3053	Performance Criteria		<p>Local control capability shall be provided to ensure the safe operation of trains by means of Local Control Panels (LCP).</p> <p>At a minimum, the LCP shall indicate track circuit occupancy, signal status, switch position and correspondence, switch locking, traffic direction, manual control, automatic control, and crossing gate position, AC Alarm, DC Alarm, Communication failure Alarm, Microprocessor System failure (Electrologix, VHLC, iVPI, or Microlok), Intrusion detection.</p> <p>These indications shall also be available at Yard Control Tower.</p> <p>LCP shall be of size such that it can display the complete layout of the territory controlled from the location, without need to change screens or scrolling. Mainline track lead indications must be included in the layout, if adjacent to the area of control. Display used for local control panel purpose shall be 32" minimum and be wall mounted.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		9.4.6.6	YARD DWARF SIGNALS														
3054	Performance Criteria		<p>a) Dwarf signals shall be either a 2 head or 3 head unit. The signal shall be used to display permissive aspects at the entrance to each Yard interlocking when routes have been established within the Yard.</p> <p>b) Dwarf signal number plates shall be provided below the lowest dwarf signal lens in the assembly. Signal plates shall meet the requirements of the AREMA C&S Manual and contain alphanumeric characters a minimum of 3 inches high.</p> <p>c) Aspects displayed shall be as follows</p> <p>Aspect: Meaning Green: First switch point in route is in the normal position. Proceed in Yard mode of Operations. Yellow: First switch point in route in reverse position. Proceed in Yard mode of Operations. Red: Stop. Contact Yard Control.</p> <p>If project requirements allow, dwarf signal heads might be substituted by runway-type color signals.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		9.4.6.7	INTERLOCKINGS														
3055	Performance Criteria		<p>As a minimum, the following locking functions shall be provided for powered switch interlockings:</p> <p>a) Switch locking - A locking function shall ensure that a signal governing a switch or combination of switches shall only show a less restrictive aspect than "stop", when all switches in a route are locked in their correct position.</p> <p>b) Route locking - Route locking shall lock switches within a route after a signal has been requested and switches are in their proper position. Route lockers shall prevent clearing of opposing and conflicting signals within the interlocking. Route locking shall be in effect when approach locking is in effect, and it shall remain in effect until the rear of the train has cleared the route.</p> <p>c) Switches, which are part of the route, and switches or signals, which are protecting against flanking (side-swipe), shall be disabled from moving when the route is locked. Signals protecting this route shall be prevented from showing aspects other than stop.</p> <p>d) Approach/Time locking – Approach/Time locking shall maintain switch locking for a predetermined time after a signal has been canceled and there is a train on approach to the signal. .</p> <p>e) Detector Locking – Detector locking shall prevent movement of a switches within an interlocking when any of the track circuits in the interlocking are occupied. Detector locking circuits shall only use contacts from the ac vane track relay. Contacts from non-vital repeaters shall not be used in switch locking circuits.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
3056	Performance Criteria		<p>Detector tracks shall have 5 seconds loss of shunt protection. Sectional release shall be provided where practicable.</p> <p>Any failure, including loss of power, to any part of an interlocking shall not result in the premature release of any locking function.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		9.4.6.8	TRACK SWITCHES														
3057	Performance Criteria		<p>All track switches shall be powered and interlocked. They shall normally be set and locked automatically. An over-switch (OS) track circuit shall be provided, occupation of which shall prevent powered movement of the switch.</p> <p>A manual switch setting facility shall be provided at powered switch locations. The pPlacing of a powered switch into manual operation shall result in loss of indication. Signals shall revert to their most restrictive aspect in the event of loss of indication of switch position.</p> <p>Switch and lock mechanisms shall meet or exceed the recommendations of the AREMA Communications & Signals Manual of Recommended Practice, Part 4.2.5.</p> <p>Parts of switch operating layouts shall be interchangeable between similar layouts.</p> <p>All switch machines in the yard shall have battery backup of 4 hours and have hand throw capability.</p> <p>Mainline switch machines shall be installed for all track switches leading to mainline tracks.</p> <p>Provide green/yellow switch position indicators for facing point switches that are not directly governed by a signal.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			

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		11.5.6	SERVICE AND INSPECTION (S&I) FACILITIES FOR SCHEDULED AND RANDOM SERVICE, INSPECTION AND LIGHT REPAIR															
	Performance Criteria		Items D through N apply to LRV only.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	A	S&I Facility may occupy a bay (bays) in Main Shop Building or be located in a Yard as a separate facility.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	B	Length of the S&I Shop shall accommodate the longest revenue train over the pit.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	C	Underground pit along with service platform at vehicle roof level for undercarriage and roof access shall be provided (roof access applies to LRV only).	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	D	Access to both sides of the vehicle at top of rail level shall be provided, including ability to open or remove vehicle skirt covers.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	E	Removable 3.5 feet tall safety railing shall be provided around the underground pit to enclose the pit perimeter, when there is no vehicle over the pit.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	F	Service platform at vehicle roof level shall be provided for roof access.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	G	Access to a roof level platform shall be blocked when there is no revenue vehicle present, using a system of interlocking entrance gates and track occupancy sensors (Platform Access System).	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	H	Platform Access System shall include traction power (OCS) shut-off feature, activated, when access is allowed and combined with a visual indication (blinking warning sign) of energized OCS. The circuitry associated with these functions shall be of fail-safe design. This means that during an open circuit and/or a dropped relay the OCS shall be automatically shut-off. Two blinking lighted signs shall be provided with independent circuitry and the OCS shall be considered energized upon the status of any single warning blinking sign.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	I	Platform Access System shall be segmented to allow service also of two-car consists and single vehicles on either side of a platform.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	J	Platform Access System shall include provisions for recognition of non-revenue vehicles on S&I tracks.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	K	Platform Access System shall block access to the platform in case of power outage in a Shop.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	L	Platform Access System shall allow exit from the platform in case of power outage in a Shop.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	M	Emergency egress and Exit lights shall be provided as required.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	N	Platform Access System shall include provisions for manual override rights by higher level supervisor in case of emergency.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	O	Platform Access System shall incorporate occupancy sensors on a secondary platform and interlocking safety devices at the vehicle end (see below).	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	P	A narrow secondary platform, not less than 4 feet wide, shall be provided on a side of a track opposite to a service platform for protection of a person working on a roof and for service flexibility.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	Q	Access to the secondary platform shall be made possible only from the main platform through the roof of the vehicle.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	R	The secondary platform may be replaced with a safety railing with Metro approval.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	S	The space between main and secondary platforms (or platform and safety railing) at the end of the last vehicle in a consist shall be blocked by a manual or mechanically operated interlocked end gate, integrated in Platform Access System.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	T	End gates shall accommodate three and two-car consists along with a single vehicle.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	U	Walking surface of the roof level platform shall be at 12.25 feet above top of rail, the edge of the platform shall be in 4.0 feet from track center and width of the platform shall not be less than 4 feet. Clearance between the platform and any part of the moving rail vehicle shall not be less than 4 inches (0.33 ft). See Exhibit 1 diagram provided as reference.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	V	Maximum gap for a technician to step from the platform over the shroud down to the roof shall be 7 inches (0.6 ft) when vehicle is positioned for service.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	V1	Mechanically operated catwalk extension shall be used to achieve a maximum gap for the shroud, if needed (for the AnsaldoBreda LRV)	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	V2	Extension mechanism may be activated only when vehicle, which requires catwalk extension, is positioned on a service track.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	V3	Extension mechanism shall be interlocked with Traction Power System to eliminate possibility of catwalk to be extended, when traction power is on. This will prevent any vehicle movement on a service track next to an extended catwalk.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	V4	Catwalk extension shall be fully retracted before traction power can be turned back on (re-energized).	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	W	Supply of compressed air and shop power shall be provided at all three service levels (two for HRV).	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria	X	Provisions shall be made for vehicle fluid supply reels in the inspection pit.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			

METRO RAIL DESIGN CRITERIA				SEG LINE CITIES											Specs & Plans		
ID	TYPE	SECTION	DESCRIPTION	No Exception= NE Exception = EX											VARIANCE	DOCUMENT/SECTION	
				LOS ANGELES	HUNTINGTON PARK	BELL	CUDAHY	DOWNEY	SOUTH GATE	PARAMOUNT	BELLFLOWER	CERITOS	ARTESIA	VERNON			
		11.11	TRACTION POWER SUBSTATIONS, YARD LIGHTING, COMMUNICATIONS, SIGNAGE AND GRAPHICS														
		11.11.1	TRACTION POWER SUBSTATION														
	Performance Criteria		For Yard electrification, a Traction Power Substation shall be provided with the necessary switch gear and control equipment. Substation shall be accessible to road vehicles for installation, repair, maintenance and Fire Department needs. See more of Traction Power requirements in Section 9 Systems.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		11.11.2	YARD LIGHTING														
	Performance Criteria		The Yard shall be illuminated for operations to be performed safely throughout a 24-hours day. A minimum illumination of two foot candle at ground level shall be provided in all areas, including aisle ways with tracks that are fully occupied by rail cars. This minimum shall not include any illumination from the rail cars. Yard lights, towers, poles and stanchions shall be located in a way, that they will be accessible for maintenance, minimize shadows and do not interfere with routine Yard operations. Yard lights shall be mounted on existing or proposed buildings or other structures whenever it is possible to minimize the need for separate Yard lighting support structures. Yard light pole shall be grounded and each shall have grounding rod (electrode). See more of lighting requirements in Section 7 Electrical.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		11.11.3	COMMUNICATIONS														
	Performance Criteria		All communications throughout the Yard and Shops shall be by radio, telephone and public address system. See more of Communications requirements in Section 9 Systems.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		11.11.4	SIGNING AND GRAPHICS														
	Performance Criteria		Signs and graphics shall be provided throughout the Yard and Shops wherever it is necessary for safety, security, directional, informational; shop, room and track identification location of Yard Limits and other such needs. Signage and Graphics appearance shall be consistent with ones at existing facilities. See more of Signage and Graphics requirements in Section 6 Architectural.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		12	SAFETY SECURITY SYSTEMS ASSURANCE														
8.0		12.1	INTRODUCTION														
		12.1.1	ABBREVIATIONS AND ACRONYMS														
		12.1.2	REFERENCES														
		12.1.3	CODES, STANDARDS AND REGULATIONS														
9.0		12.2	SYSTEM SAFETY														
		12.2.1	SPECIFIC PROVISIONS FOR SAFETY														
	Performance Criteria		Specific provisions for safety are addressed in the specific design criteria for each rail system element. Certain provisions accounted for elsewhere in the Rail Design Criteria are cited in this section to highlight how safety shall be collectively incorporated in specific design elements. This section of the design criteria provides design guidance in System Safety for systemwide aspects and phases of the Metro Rail Transit System.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
		12.2.2	GENERAL														
	Performance Criteria		Safety is a primary consideration through the evolution of each Light-Rail Transit and Heavy Rail Transit System, from preliminary engineering through revenue operations. To achieve safety goals, all applicable codes and regulations, augmented by modern safety engineering technology and industry standards, are to be used to ensure that each Metro Rail Line achieves a level of safety that equals or exceeds that of the rail transit industry.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria		Transit station construction should consider accepted Crime Prevention Through Environmental Design (CPTED) standards within underground station and on at-grade platforms or plazas. The basic function of public transit is to efficiently and safely move the public from one location to another. CPTED promotes open space and the use of structure and seating design to inhibit loitering.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			
	Performance Criteria		Transit station construction should consider accepted Crime Prevention Through Environmental Design (CPTED) standards within underground station and on at-grade platforms or plazas. The basic function of public transit is to efficiently and safely move the public from one location to another. CPTED promotes open space and the use of structure and seating design to inhibit loitering.	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE			

METRO RAIL DESIGN CRITERIA				SEG LINE CITIES											Specs & Plans	
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				LOS ANGELES	HUNTINGTON PARK	BELL	CUDAHY	DOWNEY	SOUTH GATE	PARAMOUNT	BELLFLOWER	CERITOS	ARTESIA	VERNON		
	Performance Criteria		<p>Central/Satellite Control Facilities: The design of the central control facilities shall allow for graceful degradation of control functions enabling continued operation. Provisions shall be provided to continue operation of the rail system at full capacity in the event of loss of automated vehicle position information.</p> <p>Maintenance Facilities: The inability to perform maintenance at the facility does not directly lead to the loss of rail service. However, the ability to perform regular maintenance on the system is essential to the success of the overall operation.</p> <p>The maintenance facility shall include redundant capability to perform overnight and weekly vehicle system checks, repairs, and replenishment.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
		12.4.5	AVAILABILITY													
		12.4.5.1	SCOPE													
	Performance Criteria		<p>The Scope of availability is largely based on the types of downtimes used in the computation and on the relationship with time (i.e. the span of time to which the availability refers).</p> <p>This classification is what is sometimes referred to as the availability as seen by maintenance personnel. This classification excludes preventive maintenance downtime, logistic delays, supply delays and administrative delays. Since these other causes of delay can be minimized or eliminated, an availability value that considers only the corrective downtime is the inherent or intrinsic property of the system.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
		12.4.5.2	CALCULATIONS													
	Performance Criteria		<p>The corrective downtime reflects the efficiency and speed of the maintenance personnel, as well as their expertise and training level. It also reflects characteristics that should be of importance to the engineers who design the system, such as the complexity of necessary repairs, ergonomics factors and whether ease of repair (maintainability) was adequately considered in the design.</p> <p>For a single component, the availability can be computed by:</p> $A_I = \frac{MTTF}{MTTF + MTTR}$ <p>MT</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		
	Performance Criteria		<p>For a system the mean time between failures (MTBF) shall be considered and compute this as follows:</p> $A_I = \frac{MTBF}{MTBF + MTTR}$ <p>MTBF = Uptime / Number of System Failures MTTR = Corrective Maintenance Downtime / Number of System Failures</p> <p>Note that until steady state is reached, the MTBF calculation may be a function of time (e.g. a degrading system). In such cases, before reaching steady state, the calculated MTBF changes as the system ages and more data are collected. Thus, the above formulation should be used cautiously. Furthermore, it is important to note that the MTBF defined here is different from the MTTF (or, more precisely for a repairable system, MTTFF: mean time to first failure).</p> <p>System availability can be enhanced during design by including redundancies and by the planned use of effective failure management procedure.</p>	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE		



Metro[™]

Interoffice Memo

Date	June 14, 2024
To	Karen Gorman, Office of the Inspector General
From	June Susilo through Tim Lindholme
Subject	Response to OIG's Report on Comparison of MRDC to Cities' Standards Along Southeast Gateway Line

The Metro Office of the Inspector General (OIG) completed a study comparing design standards between the Metro Rail Design Criteria (MRDC) and those of the cities that the Southeast Gateway Line project (Project) traverses through including Huntington Park, Bell, Cudahy, Downey, South Gate, Paramount, Bellflower, Cerritos, Vernon, Artesia, and Los Angeles.

The following are recommendations from the OIG's report:

- Recommendation 1: Metro make updates to its MRDC promptly as requirements change and include best practices to ensure cities can trust Metro's MRDC to reflect legally correct and good quality requirements.
- Recommendation 2: Metro be self-permitting for substantially consistent or more stringent standards than a city where we are performing construction.
- Recommendation 3: Metro seek an accelerated, abbreviated permitting process for the SEG Line project and for other Metro projects in the future, for the non-conforming "exception" specifications related to the project.

The results of the OIG's report could not have been timelier as the Project recently reached two significant milestones on April 25, 2024, including Board certification of the Final Environmental Impact Report (FEIR) and the release of a Request-for-Bid for a Construction Manager General Contractor (CMGC) for Advanced Works. As noted in the report's conclusion on page 26, a "unified design and construction standard, conformed from the MRDC and the criteria of the SEG [Southeast Gateway] Line Cities would be valuable to guide the development of the Southeast Gateway Line construction contract and improve project delivery." **Metro agrees with the OIG's assessment and believes the recommendations align with the project's early due diligence strategy of addressing key risks early on including critical third-party approvals.**

Currently, on Metro projects, the contractor submits a permit application and fees to perform work (ranging from utility potholing to roadway construction and striping as an example)

within city right-of-way. City staff (or their consultants) review the application with supporting documents such as construction drawings, provides plan check reviews and comments, and ultimately approves or rejects the application. On transit projects like Southeast Gateway Line, it is expected that the contractor would have to submit multiple permits to perform various work scopes within city right-of-way. This creates the potential for scope creep and schedule delays and ultimately increases costs to Metro. Allowing Metro to self-permit would likely improve Metro's control over the schedule and reduce schedule risks and costs.

For each of the OIG recommendations, Metro is undertaking the following steps:

- Recommendation 1: The MRDC is a living document in which Metro systematically updates to reflect change in law, industry practice, and lessons learned from recently executed projects. In fact, Metro is in the process of updating specific of the MRDC to address lessons learned from the K-Line/LAX and Regional Connector Projects.
- Recommendation 2: In ongoing coordination with cities within the Project, staff has mentioned the idea of Metro to self-permit for work within city and/or public right-of-way to help identify potential offset payments for cities' 3% contribution to fund the project. The cities generally have been receptive to the idea, and is expecting the Project team to present to the Southeast Gateway Line City Managers' Technical Advisory Committee on the valuation methodology this summer.
- Recommendation 3: As staff continues to refine the valuation methodology specific to the Project, Metro is planning to introduce this proposal to cities on other major transit projects including Eastside Transit Corridor Phase 2. This project also recently accomplished Board certification of the FEIR.

Office Of The Inspector General

Metro Rail Design Criteria Review Report

Presented By
Karen Gorman
Inspector General

July 2024

Construction Committee

Los Angeles County Metropolitan Transportation Authority



Purpose Statement

The OIG initiated a study to determine what differences exist between the Metro's rail design criteria and the typical design specifications of cities in Los Angeles.

The 11 Cities along the Southeast Gateway Line were chosen to use as samples for the study.

The purpose of the review was to determine if there exists any opportunities for streamlining and further efficiency in the permitting processes in relation to the specifications.

Findings

1. MRDC and 11 Cities' specifications are 99.5% the same.
2. Permitting review is not warranted for the conforming specifications.

Recommendations

Recommendation 1: Metro make updates to its MRDC promptly as requirements change and include best practices to ensure cities can trust Metro's MRDC to reflect legally correct and good quality requirements.

Recommendation 2: Metro be self-permitting for substantially consistent or more stringent standards than a city where we are performing construction.

Recommendation 3: Metro seek an accelerated, abbreviated permitting process for the SEG Line project and for other Metro projects in the future, for the non-conforming "exception" specifications related to the project.

Metro agrees with the OIG's recommendations as they align with the Project's early due diligence strategy of addressing key risks early on including critical third-party approvals.

Allowing Metro to self-permit would likely improve Metro's control over the schedule and reduce schedule risks and costs.

Steps SEG Line already taking:

- Metro continues to update MRDC to reflect change in law, industry practice, and lessons learned from recent projects.
- Discussions with corridor cities on the idea of Metro to self-permit for work within city and/or public right-of-way to help identify offset payments for cities' 3% contribution to fund the project.
- Metro plans to introduce self-permitting idea to cities on other transit projects including Eastside Extension Phase 2.