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South Coast British Columbia
Transportation Authority

Dan Levy
Director - Chief Office of Civil Rights
Los Angeles County Metro Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

May 28, 2019

Dear Mr. Levy:

RE: LA Metro Peer Review 2019 – TransLink

Thank you for inviting TransLink to participate in a comprehensive peer review of Los Angeles County Metro Transportation Authority's (LACMTA) Americans with Disabilities Act (ADA) compliance on its fixed route transportation services. TransLink (Vancouver, Canada's regional transportation authority) sent a peer review committee comprised of the following members:

- Kathy Pereira, Director, Access Transit Service Delivery, Coast Mountain Bus Company
- Tessa Forrest, Manager, Access Transit Planning, TransLink

The peer review took place over a two-day period in April 2019 and was great opportunity to understand your transit services and its alignment to the ADA legislation by meeting with staff responsible for ADA compliance. Subject matter experts provided an overview of each aspect of your oversight processes.

We were also provided a tour of a bus facility, rode in-service buses and rail cars, and observed the Mystery Rider Program, which is used to monitor compliance of LACMTA operators regarding the LACMTA's ADA related policies and procedures.

It also presented an opportunity for us to consider our own services as we learned how LACMTA addresses accessibility for customers with disabilities. We look forward to sharing what we learned with the leaders of TransLink, Coast Mountain Bus Company and BC Rapid Transit Company.

The change that you have delivered for your customers with disabilities since the Gaddy case is impressive. Highlights for us were the variety of ways that you now engage with operators to ensure that accessibility and customer service is always front of mind, and the requirement to have the Civil Rights Office review and provide formal sign-off on all infrastructure projects.

2019 Accessibility Peer Review Checklist

Please find attached the 2017 Accessibility Peer Review Checklist based on the policies, procedures, and topics that were reviewed by the peer reviewers, including:

CIV 5 – Metro Civil Rights Policy

CIV 1 – Oversight of Accessible Services, Programs, and Construction Projects

Metro Civil Rights Policy

CIV 9 – Providing Transportation Services to Individuals with Disabilities

Gen 42 – Accessibility Complaints Handling Process

- Bus operator training
- Bus operator rulebook
- Communications
- Customer complaints
- Construction
- Vehicle maintenance
- Preventative vehicle maintenance
- Mystery Rider Program
- Bus and rail car configuration

After a comprehensive review of LACMTA’s policies and procedures regarding ADA compliance for its fixed route transportation services, it is our opinion that the LACMTA is, for the most part, compliant in areas reviewed.

Additional Comments not Captured on Peer Review Checklist

Currently there is no prescriptive legislative guidance (such as the ADA) applicable in British Columbia and this means TransLink has developed approaches to serving our customers with disabilities in response to their needs.

As a result, we can provide LA Metro with recommendations that fall outside of the scope of ADA but could result in further improvements for your customers. These are as follows:

Handling of Complaints:

- Consider developing a process to ensure that all recommendations have been fully implemented. This could include strategies such as:
 - Exception reporting on incomplete implementation identified on a 30-60-90 day reporting cycle, with escalation at each milestone.
 - Introduction of a random audit on the implemented recommendations to ensure sustainment.

Address the Needs of a Variety of Disability Groups:

- Consider expanding the Secret Shopper program to include other disabilities aside from wheelchair users, e.g. people who are blind, deaf or have invisible disabilities.
- Consider developing a program such as TransLink's Station Attendant Program which allows customers with sight-loss to call ahead for assistance from station attendants at rail stations.

Customer Communication:

- Consider implementing a Live Chat function on your website to better meet the needs of the deaf community.

Point of Sale Mobility Devices:

- Consider partnering with organizations that sell mobility devices so when new scooters, wheelchairs and other mobility aid users identify they will be using transit, they can book a training session on how to manage their device on the buses.

Provide Opportunities for Operators to Hear Directly from Customers:

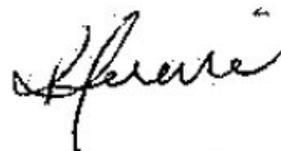
- Consider creating opportunities for customers with disabilities to speak to operators as part of training and other operator engagement.

Your commitment to improving accessibility, including this annual peer review, is to be commended. We appreciated the opportunity to meet your team and to hear about all the excellent work you are doing and wish you continued success with ongoing improvements to your services.

Sincerely,



Tessa Forrest
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Attachment:
2019 Accessibility Peer Review Checklist