

CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

Date: July 29, 2024

To: Honorable City Council
c/o City Clerk, Room 395
Attention: Honorable Heather Hutt, Chair, Transportation Committee

From: Laura Rubio-Cornejo, General Manager 
Department of Transportation

Subject: **BUS LANE ENFORCEMENT PROGRAM**

SUMMARY

In response to Council File [\(CF\) 21-1224](#), this report provides an overview of the Memorandum of Understanding (MOU) between the Los Angeles Department of Transportation (LADOT) and the Los Angeles County Metropolitan Transportation Authority (Metro) to use cameras to enforce parking violations in bus lanes and bus stops.

RECOMMENDATION

That the City Council NOTE and FILE this report.

BACKGROUND

On October 8, 2021, California Governor Gavin Newsom signed Assembly Bill (AB) 917 into law, amending California Vehicle Code §40240, §40240.5, and §40241 to authorize public transit agencies statewide to implement programs that collect video images of parking violations in bus lanes and zones and partner with local jurisdictions to issue and adjudicate parking citations. This authority is effective until January 1, 2027. Pursuant to AB 917, following the launch of the program, Metro will provide to the State Legislature an evaluation report of the enforcement system's effectiveness, impact on privacy, impact on traffic outcomes, cost to implement, change in citations issued, and generation of revenue.

In November 2021, City Council directed LADOT to report on the Metro/LADOT bus lane enforcement partnership including an expected timeline for implementation, a communications plan letting the public know about upcoming enforcement, any legislative actions by Council needed to locally authorize the program, and any staffing and budget needed to implement the program.

In September 2022, LADOT reported with an update on program development in partnership with Metro, an anticipated timeline, and necessary next steps and resources to implement the program. On January 18, 2023, City Council requested that the City Attorney's Office draft an ordinance to effectuate the program, and directed LADOT to report after LADOT and Metro executed an MOU.

DISCUSSION

The authority granted by AB 917 allows for an innovative partnership between Metro and LADOT to use cameras mounted on Metro buses to more consistently enforce parking violations in bus lanes. The

cameras will capture license plate information on vehicles that are parked in bus lanes and bus zones within the City's jurisdiction. Metro will provide the violation information captured by these cameras to LADOT to confirm valid violations and issue citations by mail.

Dedicated bus lanes improve service reliability and reduce travel times for riders. To ensure compliance with bus lanes in the City and realize these benefits, LADOT traffic officers monitor and enforce parking violations in bus lanes. This resource-intensive approach relies on officer presence to achieve compliance. Given the increasing demands on our Parking Enforcement Officers and limited staffing resources, enforcement has not been consistent enough to have lasting behavior change. The new program will increase enforcement efficiency, which is increasingly important as LADOT traffic officers have taken on expanding demands in recent years, and as the Fiscal Year 2024-2025 budget eliminates more than 50 traffic officers. The program will also reduce traffic congestion, improve air quality, and lower the frequency of illegally parked vehicles in bus lanes and zones, which is not only a safety concern, but a significant source of delays to buses during peak hours.

Since August 2021, LADOT and Metro have held regular meetings to develop a camera bus lane enforcement program, address coordination issues, and develop a bus lane enforcement system MOU that clearly describes program requirements and defines agency roles and responsibilities.

Under this MOU, Metro will lead public outreach and communication for the program, install and maintain the cameras, and submit the violation evidence packages to LADOT. LADOT will confirm the validity of the violations, process and issue the citations, and manage the administrative review and hearing process for contested citations. The MOU includes a cost-sharing agreement to ensure cost recovery and establish a revenue split.

With this MOU in place, and following an ordinance to amend 89.60 to establish a base fine and late payment penalties for a bus lane parking violation, Metro can launch the pilot program.

Program Design

The camera bus lane enforcement program will launch with 100 APLR cameras installed on buses operating in two stages on Metro buses serving the following bus routes:

1. Stage 1 (camera installation already under way):
 - Line 212 on La Brea Boulevard
 - Line 720 on Wilshire Boulevard
2. Stage 2 (installation and deployment approximately two months after Stage 1):
 - Lines 910/950 on the Silver Line
 - Line 70 on Olive Street/Grand Avenue

Metro conducted a "proof of concept" test of the camera system to collect data on two routes (720 Wilshire Rapid and J Line 910) from November 22, 2021 through December 22, 2021. The proof of concept captured 823 "bus lane obstructions," with an event capture accuracy rate of 92%. Of those events, 97.5% of captured license plates were read successfully by the bus-mounted camera. Based on this data collected during Metro's proof of concept, LADOT and Metro anticipate an annual volume of 108,000 citations. This estimate is based on four violations per bus lane per day, and one per bus stop per

day, for a total of five violations per day along each route. The volume of citations is calculated at 180,000 events per year minus a 40% rejection rate (based on the Washington D.C. Department of Transportation's experience), for a total of 108,000 valid violations.

Metro states that violations will be enforced in bus lanes during operating hours and at bus stops 24 hours a day, seven days a week. They estimate that the violation rate will likely be 10-20% higher during the initial rollout and stabilize as people become more aware of the program.

As required by State law enacted by AB917, Metro and LADOT will provide the public with information about the enforcement program, existing parking regulations, and the payment options available for low-income persons at least 60 days prior to program launch, and will issue warnings for the first 60 days of the program. Evidence may only be retained for up to six months from the date the information was first obtained, or 60 days after final disposition of the citation, whichever date is later, after which time the information shall be destroyed. Images captured by the bus-mounted cameras that do not contain evidence of a parking violation occurring in a bus lane or bus stop shall be destroyed within 15 days after the information was first obtained.

Cost recovery and revenue

Per the MOU, both LADOT and Metro may recover capital, operations, maintenance, and labor costs from revenue generated by citations issued through the program. All revenue collected and costs incurred will be reported and reimbursed quarterly and fully reconciled annually.

LADOT expenses include two fully burdened, full-time traffic officers totaling \$289,109 in combined salaries and benefits annually. LADOT's parking services contractor will provide set-up and maintenance for the new violations in both the existing software management program, eTIMs, and an additional software management program, Citeweb, which is their proprietary photo enforcement application. The costs are \$38,000 for eTIMS set-up and customization, and \$92,000 for Citeweb set-up that includes programming/development, full end-to-end testing, and deployment of new applications. The costs include building the integration with Metro's contractor, configuration of metadata, and set-up of a new notice type with eTIMS business rules and program logic. These costs were spread over three years to align with Metro's anticipated cost projections.

The ratio of program expenses is 75.92% Metro and 24.08% LADOT. To simplify matters, the MOU agrees to a 75/25 revenue split, with 75% going to Metro and 25% to the City. In the event there are excess funds after the annual reconciliation is complete and both parties have been reimbursed for all costs, LADOT shall retain the excess funds. Metro and the City will continue discussions for the possible reinvestment of net revenues to transportation enhancements within the City. Once those discussions have been completed, LADOT will report back to the Mayor and City Council for approval. Based on the anticipated number of citations issued through the program, recoverable program costs, and the 75/25 revenue split, LADOT anticipates \$5,472,596 in annual net revenue.

Anticipated timeline

Once the City Attorney's Office presents a draft ordinance to the City Council that would establish the penalty and fines for the enforcement of bus lanes in the City, LADOT and Metro will execute next steps. The anticipated program timeline is as follows:

- Metro Board Approval: October 2023
- Executed City/Metro MOU: July 2024
- Installation and Configuration: November 2023 – May 2024
- Public Outreach and Warning Citations Issued: July 2024 – August 2024
- Program Launch: August 2024
- First citation issued: November 2024

FISCAL IMPACT STATEMENT

By establishing the MOU with Metro for a 75/25 split of the bus lane enforcement citation revenue, LADOT anticipates collecting \$5,472,596 annually in net revenue. The net revenue assumes funding two existing traffic officer positions in the FY 2024-25 General Fund budget. The cost may be further offset by an expected increase in bus lane/zone citations issued and improved operational efficiency of bus lane/zone enforcement as the program grows. Final terms between Metro and LADOT on the potential reinvestment of net revenues from the bus lane enforcement program will be brought back to the Mayor and Council for approval once discussions have been completed.

LRC:BH:KH:dg