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Villa Station

32 • Sierra Madre  
Villa Station

40 • Old Pasadena

60 • Sierra Madre/  
Michillinda  
Mon-Fri Rush Hrs

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Call 511  
Go511.com

Stop #  
125460

August 2019



**City of Pasadena  
Transit Division  
Title VI Program**

Member of Non-Faceted Com  
Three Year Summary of Title VI  
City Council approval of Title VI

# City of Pasadena Transit Division Title VI Program

*Submitted August 2019*

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## Introduction to Title VI Program

The City of Pasadena Transit Division, responsible for the planning and operation of Pasadena Transit and Pasadena Dial-A-Ride, is committed to ensuring that no person is excluded from participation in, or denied the benefits of its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964. In addition to Title VI of the Civil Rights Act of 1964, the City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation. In accordance with Federal Transit Administration requirements, the following report provides:

1. Examples of Title VI Notice to Beneficiaries in Pasadena's public buses and offices
2. Title VI Complaint Filing Procedures and Complaint form
3. Analysis of Limited English Proficiency population in Pasadena's service area including Pasadena, Altadena, San Marino and unincorporated LA County in San Gabriel and its interaction with Pasadena's public transit system
4. Language Assistance Plan for Limited English Proficiency population
5. Public Participation plan
6. Construction History
7. Service Standards and Policies including load factor, headways and distribution of amenities
8. Membership of non-elected committees and their recruitment
9. Summary of outreach efforts
10. City Council approval of Title VI plan (for submittal to LA Metro)

## Title VI Notice to Beneficiaries

The following text is posted on Pasadena Transit and Dial-A-Ride vehicles fleet wide, as well as at the public counter at the Pasadena Transit/Dial-A-Ride administrative office. The notice is posted in English, Spanish, Chinese and Armenian. Since 2016, two additional languages have been identified in the service area (Korean and Tagalog). The Notice will be translated in those additional languages and posted.

**Title VI Notice to Beneficiaries**  
**City of Pasadena Transit Division**

The City of Pasadena Transit Division, responsible for the planning and operation of Pasadena Transit and Pasadena Dial-A-Ride, is committed to ensuring that no person is excluded from participation in, or denied the benefits of its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964. In addition to Title VI of the Civil Rights Act of 1964, the City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation. To obtain more information or to fill out a complaint form, visit <http://www.cityofpasadena.net/pasadena-transit/title-vi/> or call (626) 744-4055.

Below are pictures of the postings:

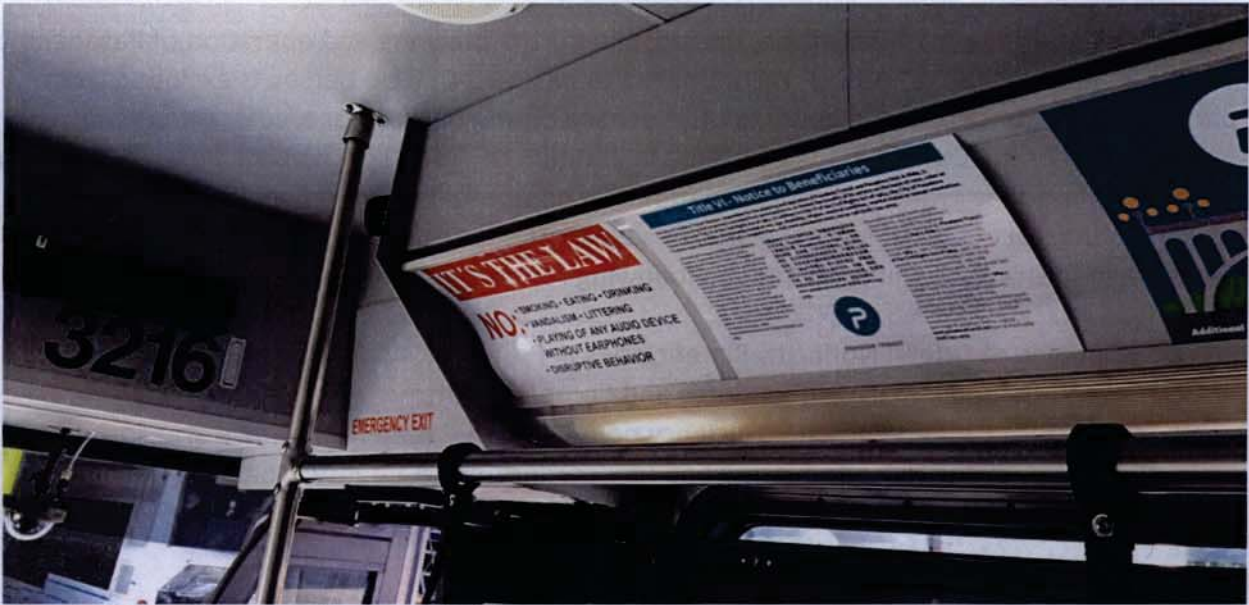


Figure 1: Title VI Notice on Pasadena Transit Vehicle

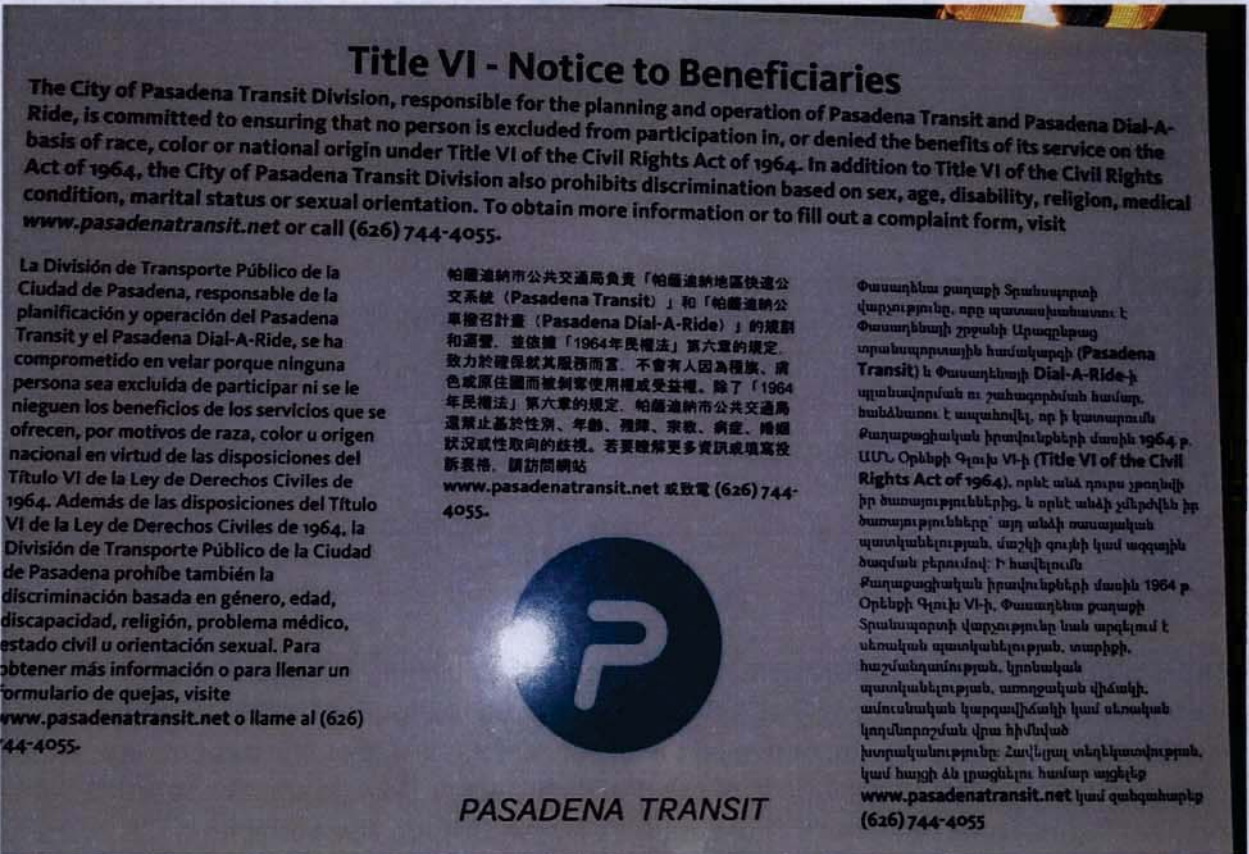


Figure 2: Photo of Title VI Notice posted on Pasadena Transit and Dial-A-Ride vehicles

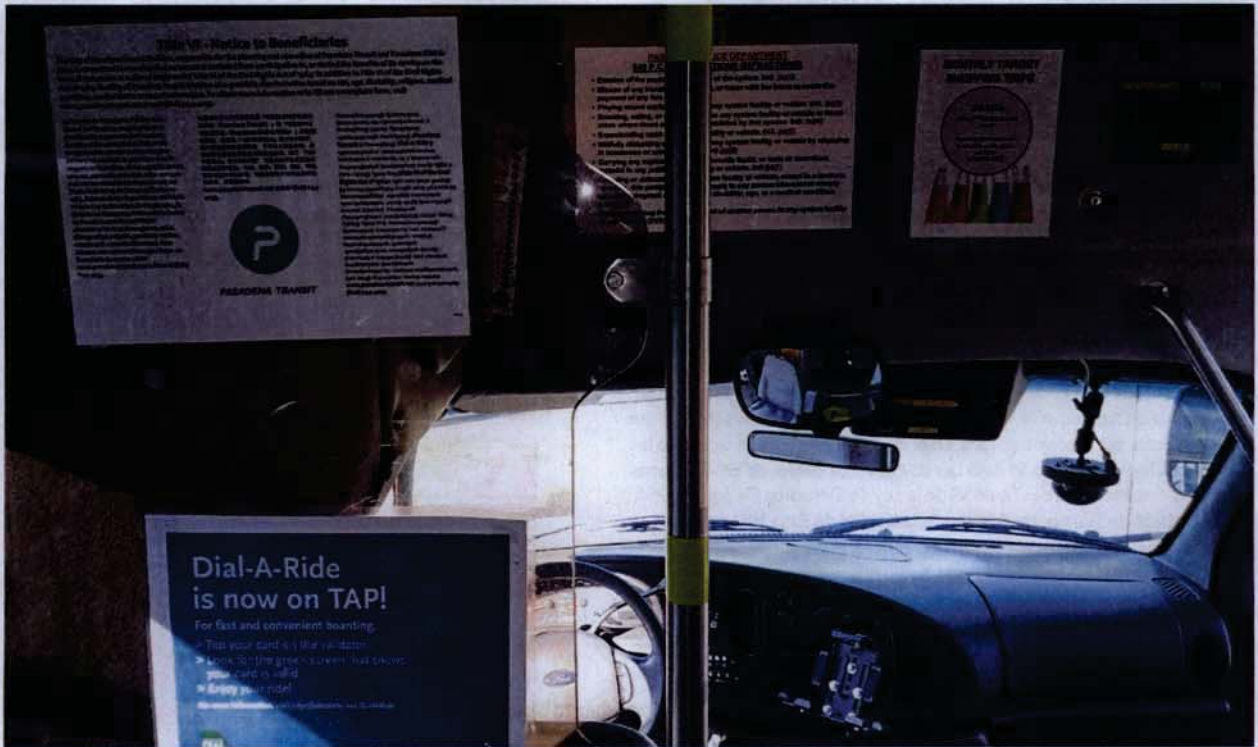


Figure 3: Photo of Title VI Posting on Pasadena Dial-A-Ride vehicle

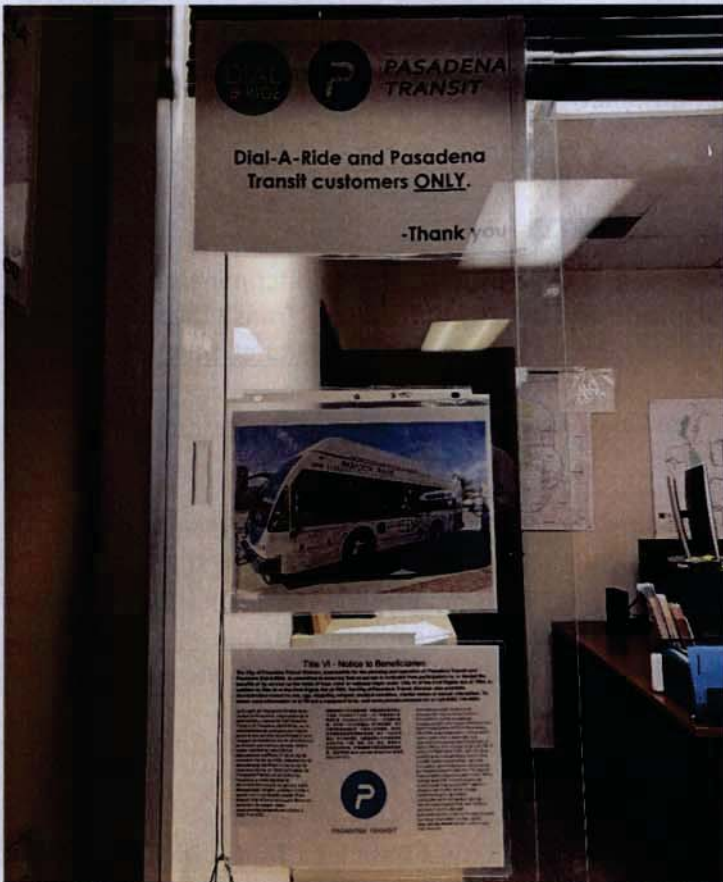


Figure 4: Photo of Title VI Posting at Pasadena Transit and Dial-A-Ride Administrative office

### **Title VI - Notice to Beneficiaries**

The City of Pasadena Transit Division, responsible for the planning and operation of Pasadena Transit and Pasadena Dial-A-Ride, is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964. In addition to Title VI of the Civil Rights Act of 1964, the City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation. To obtain more information or to fill out a complaint form, visit [http://www.cityofpasadena.net/Transportation/Public\\_Transit/](http://www.cityofpasadena.net/Transportation/Public_Transit/) or call (626) 744-4055.

La División de Transporte Público de la Ciudad de Pasadena, responsable de la planificación y operación del Pasadena Transit y el Pasadena Dial-A-Ride, se ha comprometido en velar porque ninguna persona sea excluida de participar ni se le nieguen los beneficios de los servicios que se ofrecen, por motivos de raza, color u origen nacional en virtud de las disposiciones del Título VI de la Ley de Derechos Civiles de 1964. Además de las disposiciones del Título VI de la Ley de Derechos Civiles de 1964, la División de Transporte Público de la Ciudad de Pasadena prohíbe también la discriminación basada en género, edad, discapacidad, religión, problema médico, estado civil u orientación sexual. Para obtener más información o para llenar un formulario de quejas, visite [http://www.cityofpasadena.net/Transportation/Public\\_Transit/](http://www.cityofpasadena.net/Transportation/Public_Transit/) o llame al (626) 744-4055.

Figure 5: Title VI Posting on Pasadena Transit schedules (in English and Spanish)

## **Title VI Complaint Filing Procedures**

Below is Pasadena's Title VI complaint filing procedures, complaint review process, complaint investigation process and definition of terms. All of the information in this section is provided in English, Spanish, Chinese and Armenian on [pasadenatransit.net/title-vi/](http://pasadenatransit.net/title-vi/). The complaint for will also be translated into Tagalog and Korean.

### **Title VI Complaint Filing Procedures**

Any person who believes he or she may have been aggrieved by any unlawful discriminatory practice by Pasadena Transit or Dial-A-Ride may file a complaint with the City of Pasadena Transit Division. For more information on the City of Pasadena's Title VI Policy, please visit [pasadenatransit.net/title-vi/](http://pasadenatransit.net/title-vi/).

Patrons with limited English proficiency who need assistance may visit [pasadenatransit.net/title-vi/](http://pasadenatransit.net/title-vi/) for instructions.

Title VI complaints must be filed within 180 days of the date of the alleged discrimination. Written complaints may be sent to the City of Pasadena Transit Division, 221 E. Walnut Street, Suite 199, Pasadena, CA 91101, Attn: Transit Manager/Customer Relations or an online Civil Rights Complaint Form may be accessed at the Pasadena Transit Division website at [pasadenatransit.net/title-vi/](http://pasadenatransit.net/title-vi/). Please note that accommodations will be made for individuals with disabilities who cannot complete a written form.

Any City of Pasadena employee who becomes aware of a Title VI-related complaint should immediately contact the Transit Division for handling.

In addition to utilizing the civil rights complaint process at the City of Pasadena Transit Division, a complainant may file a complaint pertaining to race, color or national origin with the Federal Transit

Administration (FTA), Office of Civil Rights: Attention Title VI Program Coordinator, east Building 5<sup>th</sup> Floor TCR , 1200 New Jersey Ave., SE, Washington DC, 90590.

### **Title VI Complaint Review Process**

The Transit Division will review any Title VI or civil rights complaint received related to alleged discriminatory treatment or harassment based on race, color, national origin, sex, age, disability, religion, medical condition, marital status or sexual orientation to determine whether the complaint is related to Transit Division services or if it is related to a different City of Pasadena department.

If the Transit Division determines it has jurisdiction, an investigator will be assigned to conduct an investigation within 72 hours of the review, which may be by City's contracted transit operator staff and/or City staff. The complainant will receive notification informing her/him whether the complaint will be investigated.

If jurisdiction is found not to exist in the Transit Division, but does exist in another department within the City of Pasadena, the complaint will be forwarded to the City Attorney's Office. The Transit Division will be notified of the steps taken to resolve the complaint.

### **Title VI Complaint Investigation Process**

The investigator will take the followings steps to investigate the alleged discriminatory act:

- Contact the management staff of where the alleged discrimination took place to determine if an investigation has been initiated and the results of the investigation;
- Identify and review all relevant documents, practices and procedures to determine appropriate resolution; and
- Identify and interview persons with knowledge of the alleged discrimination, such as the complainant, witnesses, others identified by the complainant, people who may have been subject to similar activity, or others with relevant information.

The investigation process and final investigative report will generally be completed within 180 days. If no policy violation is found, and the complainant wants to appeal the decision, he/she may appeal directly to the City Attorney's office.

### **Subsequent Complaints and Amended Charges**

Any subsequent complaint or amended charge should be filed utilizing the Civil Rights Complaint Form. Amended charges can also be submitted via email or other written format. The City of Pasadena staff will review each subsequent complaint or amendment to determine whether the subsequent complaint should stand on its own or be incorporated into the original complaint and investigation.

## **Completion of Investigation**

Upon completion of the investigation, the investigator will prepare a final investigative report for the Transit Division Manager with copies given to the transit services contractor management staff and City Attorney's office. All principle parties will receive written notification of the investigative findings.

## **Implementation of Remedial Actions**

If a policy violation exists, appropriate remedial steps will be taken immediately.

## **Definition of Terms**

**Title VI** - Title VI of the 1964 Civil Rights Act prohibits discrimination on the basis of race, color, or national origin by recipients of federal financial assistance.

**Equal Opportunity** - requirement of non-discrimination in transit services with regard to race, color, or national origin in accordance with Title VI of the 1964 Civil Rights Act, as amended.

**Discrimination** - any act or failure to act, whether intentional or unintentional, which has the purpose or effect of limiting, excluding, or denying a person transit services or benefits because of race, color, or national origin. In addition to Title VI of the Civil Rights Act of 1964, the City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation.

**Environmental Justice** - efforts made to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.

## **Availability**

These Title VI policies and procedures are to be posted:

- 1) On the Pasadena Transit Division website (translations provided per LEP Plan)
- 2) On all transit vehicles operated by the City of Pasadena ("Notice to Beneficiaries" only)
- 3) At the transit counter (translations provided upon request per LEP Plan)
- 4) On Pasadena Transit and Pasadena Dial-A-Ride documents and brochures as necessary

The Notice to Beneficiaries will be available at all four above locations. Complaint procedures will be available on the Transit Division website and at the transit counter. The complaint form will also be available on the Transit Division website and at the transit counter.



# Title VI Complaint Form

Below is Pasadena's Title VI Complaint form which is posted online at [pasadenatransit.net/title-vi/](http://pasadenatransit.net/title-vi/). The form is available on the website in Spanish, Chinese and Armenian. The form will also be translated into Korean and Tagalog.

**Civil Rights Complaint Form**  
**City of Pasadena Transit Division**

The City of Pasadena Transit Division, responsible for the planning and operation of Pasadena Transit and Pasadena Dial-A-Ride, is committed to ensuring that no person is excluded from participation in, or denied the benefits of its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964. In addition to Title VI of the Civil Rights Act of 1964, the City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation.

Any person who believes he or she may have been aggrieved by any unlawful discriminatory practice by Pasadena Transit or Dial-A-Ride may file a complaint with the City of Pasadena Transit Division using this form. Title VI complaints must be filed within 180 days of the date of the alleged discrimination.

In addition to utilizing the civil rights complaint process at the City of Pasadena Transit Division, a complainant may file a complaint pertaining to race, color or national origin with the Federal Transit Administration (FTA), Office of Civil Rights: Attention Title VI Program Coordinator, east Building 5<sup>th</sup> Floor TCR, 1200 New Jersey Ave., SE, Washington DC, 90590

Section I			
Name:			
Address: (Number, Street, Apt. City, State, ZIP)			
Telephone (home):		Telephone (work):	
E-mail:			
Accessible Format Requirements (circle if applicable):			
Large Print	Audio Tape	TDD	Other
If Other, please specify:			

Section II	
Are you filing this complaint on your own behalf? (circle one)	
Yes*	No
*If you answered "yes" to this question, go to Section III	
If not, please supply the name and relationship of the person for whom you are filing a complaint:	
Name:	Relationship:
Please explain why you have filed for a third party:	

<b>Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party:</b>	
Yes	No

**Section III**  
**I believe the discrimination I experienced was based on (circle all that apply):**

Race	Color	National Origin	Sex	Age
Disability	Religion	Medical Condition	Marital Status	Sexual Orientation

**Date of Alleged Discrimination (mm/dd/yyyy):**      \_\_\_\_/\_\_\_\_/\_\_\_\_

**Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) you believe discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach a blank page to this form.**

**Section IV**  
**Have you previously filed a Title VI complaint with the City of Pasadena?**

Yes	No
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**Section V**  
**Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?**

Yes	No
-----	----

**If yes, provide name of agency or court of all that apply:**

Federal Agency	Federal Court
State Agency	State Court
Local Agency	

**Please provide information about a contact person at the agency/court where the complaint was filed.**

Name:	Title:
Agency:	Telephone:
Address: (Number, Street, Apt. City, State, ZIP)	

**You may attach any written materials or other information that you think is relevant to your complaint.**

**Signature and date below.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Please submit this form in person at the address below, or mail this form to:**

Transit Manager/ Customer Relations  
City of Pasadena Transit Division  
221 E. Walnut St., Suite 199  
Pasadena, CA 91101

For more information about our Title VI Notice to Beneficiaries, Investigation Process, and Title VI policies, please visit <http://www.pasadenatransit.net> or inquire in person at the address listed above during normal business hours.

If information is needed in another language, please call (626) 744-4055.

Si se necesita información en otro idioma, por favor llame al (626) 744-4055.

如果信息是需要用另一种语言，请致电 (626) 744-4055.

Եթե տեղեկատվությունը անհրաժեշտ է այլ լեզվով, խնդրում ենք զանգահարել (626) 744-4055.

# Language Assistance Plan

## Introduction/Overview

Per the Title VI of the Civil Rights Act of 1964 (Title VI), the U.S. Department of Transportation (DOT) implementing regulations, and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)", the City of Pasadena Transit Division (City) is federally mandated to develop and implement a Language Assistance Plan (Plan) by which Limited English Proficiency (LEP) persons can meaningfully access translations of written and oral information. As the City is a Federal Transit Administration (FTA) recipient receiving federal financial assistance, the City must take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP persons.

This Language Assistance Plan will provide guidance to Pasadena Transit Division staff in their interaction with LEP individuals, as well as provide a framework for training staff to provide meaningful access to LEP individuals, and ensure Pasadena continues to provide meaningful access to its services and programs.

## 1. Four-Factor Analysis

FTA Circular 4702.1B details the components of the Language Assistance Plan, including the Four Factor Analysis, which provides an analysis of LEPs Pasadena may encounter to determine the specific language services that are appropriate to provide. The Four Factor Analysis balances the following factors:

- Factor One: The Number and proportions of LEP persons in the jurisdiction;
- Factor Two: How often LEPs come into contact with Pasadena services;
- Factor Three: How important Pasadena's services are to LEPs lives;
- Factor Four: The resources available to Pasadena for LEP outreach that can reasonably be provided.

The results of the Four Factor Analysis are used to determine the target LEP populations and the best methods of engaging with the public. Pasadena undertook the Four Factor Analysis in order to develop an appropriate and effective Language Assistance Plan.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.**

Pasadena Transit's service area is primarily in the City of Pasadena (with minimal service into Altadena), however, Pasadena Dial-A-Ride services Altadena, San Marino and unincorporated portions of San Gabriel in addition to Pasadena. The total population for the service area is 228,590 according to the most up to date Census Bureau's American Community Survey (2011-15) for the service area. This data was analyzed to identify potential LEP populations in this service area. This data breaks down which languages are spoken in the service area and the English proficiency by language for residents of the service area over the age of 5. According to this data, at least 29 different languages are spoken throughout the service area.

The table below shows the main languages spoken in the service area (over 1% of the population), as well as proficiency in spoken English by language group. This table specifically shows the proportion of

those that speak English “less than very well” in each language group compared to the total population of Pasadena:

	Altadena	San Marino	Unincorporated LA County	Pasadena	Total
Total Population	43310	12609	40854	131817	228590
<b>Spanish</b>					
Total	5543	774	7119	35922	49358
Speak English less than very well	3141	227	2743	14921	21032
Percent of total population	7%	2%	7%	11%	9%
Percent of language group	57%	29%	39%	42%	43%
<b>Chinese</b>					
Total	429	2832	13441	6264	22966
Speak English less than very well	110	2200	8018	3233	13561
Percent of total population	0%	17%	20%	2%	6%
Percent of language group	26%	78%	60%	52%	59%
<b>Armenian</b>					
Total	1790	30	243	4245	6308
Speak English less than very well	893	10	27	1266	2196
Percent of total population	2%	0%	0%	1%	1%
Percent of language group	50%	33%	11%	30%	35%
<b>Tagalog</b>					
Total	839	149	1015	2245	4248
Speak English less than very well	190	16	289	726	1221
Percent of total population	0%	0%	1%	1%	1%
Percent of language group	23%	11%	28%	32%	29%
<b>Korean</b>					
Total	104	204	465	1730	2503
Speak English less than very well	44	114	137	873	1168
Percent of total population	0%	1%	0%	1%	1%
Percent of language group	42%	56%	29%	50%	47%
<b>Vietnamese</b>					
Total	67	126	1166	592	1951
Speak English less than very well	24	53	467	198	742
Percent of total population	0%	0%	1%	0%	0%
Percent of language group	36%	42%	40%	33%	38%

The “Safe Harbor Provision” stipulates that documents defined as “vital” be translated into each LEP language group that constitutes five percent (5%) or 1,000 people (whichever is greater) of the “total population of persons served...or affected” that speak English “less than very well.” Vital documents are discussed in the Language Assistance Plan following the Four Factor Analysis. The analysis results showed that of the various languages spoken in the service area, five languages had over 1,000 speakers who could speak English “less than very well,” thus falling under the FTA’s “Safe Harbor Provision”

threshold. Based on the results from the American Community Survey, the languages of Spanish, Armenian, Chinese, Tagalog and Korean meet the LEP "Safe Harbor" threshold, as shown in the table below:

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Speak English less than very well	44	114	137	873	1168
Percent of total population	0%	1%	0%	1%	1%
Percent of language group	42%	56%	29%	50%	47%

**Factor 2: The frequency with which LEP persons come into contact with the program.**

The City of Pasadena Department of Transportation Transit Division operates fixed route and Dial-A-Ride public transportation. In Fiscal Year 2018, fixed route ridership was 1.5 million and Dial-A-Ride ridership was 80,000. The Transit Division has a public window and phone line that customers can utilize to apply for Dial-A-Ride membership, purchase tickets, obtain route planning assistance or ask other questions about the service. Customers can also call a Dispatch line, operated by the Transit contractor to the City, to make Dial-A-Ride appointments or request other information about transit services. LEP persons can interact with bus operators, dispatchers making Dial-A-Ride appointments, operations supervisors or

any Transit Division staff member who happens to be working the front window or answering phones. LEP individuals can be encountered at outreach events or public meetings.

Staff in the Administrative Office encounters Spanish speakers on a weekly basis and Chinese (Mandarin) speakers on a monthly basis. Contact with Armenian speakers is limited. At the Dispatch office, staff reports minimal calls from non-English speakers – approximately 2 out of every 100 calls. These are mainly from Spanish speakers, not Chinese (Mandarin) or Armenian. During the reporting period, no LEP persons have attended public meetings. Pasadena Transit staff and Dispatch staff have several bilingual (Spanish-English and Armenian-English) speakers to handle requests.

Pasadena Transit Division also reached out to other City departments to assess their contact with LEP individuals. Pasadena maintains a Citizen Service Center (CSC) which is a phone number citizens call for any number of requests including trash pick-up, tree trimming, graffiti clean-up, etc. The CSC also addresses any requests for information on Pasadena Transit real time arrivals. The CSC manager also reports minimal calls from non-English speakers. Other City departments, such as Human Services and Recreation and the Library, report that if they service non-English speakers, they speak Spanish.

Further supporting LEP analysis, the City Transit Division conducted an on-board survey in 2016 to assess passenger characteristics system-wide. During these surveys, it was found that 57 of 163 respondents (34.9%) completed the survey in Spanish, indicating that Spanish-speaking persons came into contact with the City's transit services at a high level of frequency. No respondents spoke Armenian or Chinese (Mandarin or Cantonese).

Finally, Pasadena Transit staff coordinates closely with several senior living facilities and day care centers in its provision of transit services. Several of these facilities serve large numbers of LEP individuals including Mandarin Chinese speakers. These centers have bilingual staff to help facilitate information to their clients about transit services

The results of factor two support factor one, in that the most common LEP language encountered is Spanish and to a lesser frequency Chinese. Armenian is encountered with much less frequency. There have been no reported encounters with Korean or Tagalog speakers. Section 2 discusses implementation of language assistance measures.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

Transit services operated by the City play a vital role in the lives of many residents of the service area. City transit services include connections to the Los Angeles regional transit network via service to Metro Gold Line stations, Metro bus lines, and Foothill Transit bus lines. These services reach most major job centers in Southern California. Buses operated by the City of Pasadena serve major local commercial, employment, and civic areas. They also provide convenient and nearby connections to colleges such as Pasadena City College, ArtCenter College of Design, and the California Institute of Technology, as well as elementary, intermediate, and high schools. In addition, seniors rely on transit services for trips to shopping areas, doctor appointments, and many other destinations in the City.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

The City Transit Division utilizes resources to outreach to each LEP group while maintaining cost efficiency for taxpayers. Resources include, but are not limited to:

1. Bilingual or multilingual staff members (the City's Transit Division currently has staff members who are fluent in Spanish, and the City has certified bilingual employees in Spanish, Mandarin Chinese and Armenian) (no cost)
  - For oral translation for questions that come up at the public window or the phone line
  - To review any professional translation for quality assurance
2. Professional translation services (can be implemented quickly with minimal cost)
  - Utilized to translate printed documents including Title VI forms, Dial-A-Ride applications, proposed service/fare changes, and other information (the City attempts to use universal symbols such as pictures, maps, and diagrams when feasible to streamline communication among all language groups)
  - Translation services for meetings or public hearings
3. Relationships with community organizations that regularly interact with LEP persons who can help disseminate information about Pasadena Transit services and Dial-A-Ride. Pasadena has identified the following resources to work with in outreach to LEP communities including:
  - Pasadena Human Services and Recreation Community Centers
  - Jivalagian Youth Center 2242 E. Foothill Blvd. (626) 486-2577
  - Concord, Pilgrim Towers and Sunflower Day Care: Living facilities and day care centers for high number of LEP Chinese speakers
  - Culturally specific newspapers including La Opinion
4. Collaboration with multilingual services and resources offered and utilized by other City departments (available upon request). Examples below:
  - Culturally specific programming through Pasadena Libraries or Pasadena Human Services and Recreation

## **2. Implementation**

Based on the results of the Four Factor Analysis, Pasadena has developed the following implementation plan to address the needs of the LEP populations including those identified above.

### **Providing Language Assistance**

#### **Callers and Visitors**

1. Front desk staff have "I Speak" language identification cards available to assist LEP individuals
2. Several employees in the Administrative office are bilingual and can help callers that speak Spanish. Dispatch also has bilingual employees that speak Spanish and Armenian
3. The City of Pasadena maintains a list of certified employees that can be consulted for translation that speak Spanish, Mandarin and Armenian



**Translation of documents including Vital documents:**

1. Vital documents (defined as Title VI Notice to Beneficiaries and Title VI Complaint Form) are available in Spanish, Chinese, and Armenian and will be translated into Korean and Tagalog. All versions are available on [pasadenatransit.net/title-vi/](http://pasadenatransit.net/title-vi/).
2. Instructional and informational rider materials and passenger notices are available in English and Spanish on vehicles and at various locations throughout the City, and are available for translation into other languages covered by the Safe Harbor provision by request with advanced notice. Such documentation includes, but is not limited to, Dial-A-Ride applications, service brochures, and public meeting minutes and agendas.
3. Service alerts are posted in English and Spanish for Pasadena Transit and Dial-A-Ride service. Alerts are available for translation into other LEP Plan identified languages by request with advanced notice.
4. All public meeting notices are published using the City's standard English language public notice resources which may include a variety of media outlets including the City's website, newspapers, Twitter, community outreach flyers or newsletters, etc. and the LEP Plan identified language resources, if available and appropriate.
  - a. All public meeting notices contain the following verbiage in English and the LEP Plan identified languages (Spanish, Chinese and Armenian and will be translated into Korean and Tagalog):
    - i. *Translators are available from the Department of Transportation office with 48-hour advance notice. Please call (626) 744-4055.*

*Comments regarding the [proposal, change, service, etc.] may be submitted by phone at (626) 744-4055, online at <http://www.pasadenatransit.net>, or via standard mail to City of Pasadena Transit Division, 221 E. Walnut St. Suite 199, Pasadena, CA 91101.*

5. Pictographs are used whenever possible to instruct and depict necessary information and procedures.
6. Community events where it is likely that significant numbers of LEP persons will attend, shall be staffed by at least one person fluent in the identified languages, if feasible.
7. Printed information at events is available in English and Spanish, and available for translation into other languages covered by the Safe Harbor provision by request with advanced notice.
8. All customer surveys are in English and Spanish, and in the other languages per the LEP analysis upon request with advanced notice.
9. Oral translation services shall be provided upon request.
10. Any other translation requests are addressed provided it does not create an undue financial or administrative burden.

**Procedures for Timely and Reasonable Language Assistance**

The City recognizes that implementing the LEP Plan requires City staff to be prepared and well-versed in identifying the specific needs of the LEP community. To accomplish this task, the following training has been provided to both Transit Division and transit services contractor staff:

1. Information on the City Title VI Policy and LEP Plan responsibilities.
2. Information on the Title VI complaint forms and procedures.
3. Description of language assistance services offered to the public.

4. Documentation of language assistance requests.
5. Use of interpretative services.
6. How to handle a potential Title VI/LEP Plan complaint.

Implementation of this training occurs every three years following approval of the City's Title VI program updates by Pasadena City Council.

#### **Evaluation, Updating, and Monitoring**

The City recognizes that additional LEP groups require a unique mix of communication, both written and oral, in order to be effectively informed of service changes and other customer information. As required, the City has and/or will conduct a language assessment based on the following methods:

1. Track front desk staff interaction with LEPs
2. Internal surveys of staff who are likely to engage with the public (including Dispatch and Operators)
3. Analyze updated census data to identify the percentage of LEP persons in the service area.
4. Continue to utilize ridership surveys from transit planning or marketing studies to identify the percent of transit users that are LEP persons.
5. Requests for translation

In order to better serve LEP populations within the service area, staff utilizes the following policies in monitoring and evaluating the effectiveness of the LEP Plan:

1. The City analyzes Census data as it becomes available to monitor demographic trends regarding LEP persons. Staff will add translation or other language services to affected populations as needed.
2. The City engages with community organizations serving LEP populations to jointly engage in outreach efforts to LEP populations, when applicable.
3. The City monitors instances on vehicles, at the transit counter, and through the customer comment phone and e-mail system, to determine which LEP populations are most frequently interacting with transit services.
4. The City updates the LEP Plan every three years in accordance with FTA regulations.
5. The City updates and revises the LEP Plan based on any other changes in guidance or regulations at the federal, state, or local level.

All LEP Plan changes are subject to approval by Pasadena City Council.

#### **Availability of this Plan**

This Plan shall be made available to the public at the following locations:

1. Transit Division counter at 221 E. Walnut St., Suite 199, Pasadena, CA 91101
2. Online at <http://www.pasadenatransit.net>.

# Public Participation Plan

## City of Pasadena Transit Division

### I. Introduction

The City of Pasadena Transit Division (City) operates Pasadena Transit, a community public transit circulator serving the City of Pasadena since 1994. In FY 2018, Pasadena Transit served over 1.5 million passenger trips, 63,000 revenue service hours, and 672,000 revenue service miles. The City also offers curb-to-curb Dial-A-Ride (DAR) services to senior and disabled populations within the cities of Pasadena and San Marino, as well as adjacent unincorporated areas in Los Angeles County. Pasadena Transit and DAR services are operated by First Transit and administered by the City's Transit Division within the Department of Transportation.

The Federal Transit Administration (FTA) Office of Civil Rights issued a revised Title VI of the Civil Rights Act of 1964 (Title VI) Circular, 4702.1B, effective October 1, 2012, containing new guidelines and requirements from the previous version, Circular 4702.1A, effective May 13, 2007. The revised Circular states that transit providers must approve a Public Participation Plan. As such, City staff has prepared this Public Participation Plan to promote public involvement in transit planning decision making activities. This Plan establishes formal procedures that allow for, encourage, and monitor public participation within the City including, but not limited to, minority individuals, persons with Limited English Proficiency (LEP), and low-income populations. This document describes proactive public outreach strategies and procedures.

### II. Desired Goals and Outcomes

The goal of the Plan is to offer a variety of opportunities to engage the general public in transit planning and decision-making activities in the City Transit Division in accordance with FTA Circular 4702.1B Chapter III-5 Promoting Inclusive Public Involvement. The objectives of the Plan are as follows:

- To identify stakeholders of transit services within the City of Pasadena.
- To provide procedures for public engagement on both a continual basis and for major service or fare changes.
- To establish procedures to ensure that LEP and low-income populations are engaged in transit planning and/or decision-making outreach and public comment periods.
- To utilize a variety of communication methods to capture public input from populations which are typically not likely to attend or engage in public meetings.

### III. Identification of Stakeholders

General stakeholders within the service area may include, but are not limited to:

- City of Pasadena residents including low-income, LEP, and minority subgroups
- Pasadena City Council
- Major employers, chamber of commerce, and business districts
- Major schools, including, but not limited to, Pasadena City College, ArtCenter College of Design, California Institute of Technology, and Pasadena Unified School District
- Metro, Foothill Transit, and other connecting transit agencies
- Access Services
- Non-profit and private business community
- City of Pasadena Transportation Advisory Commission

Those who may be adversely affected or who may be denied benefit of a plan's recommendation(s) are of particular interest in the identification of specific stakeholders.

#### **IV. Proactive Communication and Participation Activities**

City staff intends to deploy a wide array of public engagement methods during lead-up to major service changes and/or fare changes.

##### **Public Meetings**

City Staff shall hold public meetings for:

- **Service change threshold:** Any project resulting in greater than 25% of a system-wide change, measured by either revenue hours or directional route miles. Change may be either an increase or decrease of said metrics.
- **Fare change threshold:** Any proposed increase to the cash fare structure by the Transit Division will trigger the Public Meetings procedure.
- **Other projects meetings or plans as needed**

Notices of public meetings that are subject to City's standard 72-hour notice before the meeting date will, at a minimum, be posted on the City's website, in public buildings such as City Hall and, if applicable, on the City's transit vehicles. Notices will be posted in English and Spanish, with translated notices for other LEP Plan identified languages available upon request and with advanced notice. Meetings regarding service change threshold or fare changes would be translated into all LEP languages.

Notices for public meetings pertaining to service or fare changes that meet the thresholds identified above will be posted on the City's transit vehicles, and in public buildings such as City Hall. When service or fare changes are proposed that meet the threshold noted above, public meetings will be held and the public will be provided with a 30-day comment period.

##### **Public Meeting Locations**

It is advisable that public meetings take place in an environment, and according to a schedule, that is conducive to meeting facilitation, productive dialogue, and is convenient for members of the public from all parts of the service area. Staff will take necessary measures to ensure that meetings are accessible to minority, low-income, disabled, and LEP populations. This shall be accomplished through methods such as locating meetings throughout the service area in ADA-compliant buildings, with meeting times occurring through different points of the day such as mornings, afternoons, and evenings.

##### **Public Meeting Format**

Public meetings may consist of a brief overview of the proposed project or change, an open comment period from stakeholders, a question and answer segment, as well as an explanation of where affected populations can find further information regarding the project or change, such as the City website. Other formats, such as workshops or other collaborative measures can be utilized on a case by case basis. As Spanish is the largest language spoken other than English in the service area, City Staff will make every effort to provide at least one representative fluent in Spanish at public meetings and workshops to communicate with the Spanish-speaking population. Other LEP persons will be made aware of other feedback procedures per the City's LEP Plan.

### **30-Day Comment Period**

For members of the public who cannot attend a public meeting, the City shall open a 30-day comment period for all service and fare changes meeting the aforementioned threshold. Comments can be sent to the City either in person at the transit counter during normal business hours, on the phone to the Pasadena Transit/Dial-A-Ride numbers, via e-mail, by standard mail, and directly online when available. When warranted, comments will be responded to by City staff in the order in which they were received. Staff will log these comments and provide them to the public for review at the end of the 30-day comment period.

### **Other Methods of Communication**

Techniques utilized to engage the general population may include public notices of meetings in the local newspapers, on the City of Pasadena website, via social media such as Twitter, written and oral announcements at City public meetings, community newsletters, on City transit vehicles, and the City of Pasadena Citizen Service Center (available via phone, online, and as a smartphone app). The City will strive to proactively engage members of the public with other cost-effective approaches utilizing a broad range of techniques.

### **V. Engagement with LEP Populations**

Per the City's LEP Plan, reasonable efforts will be made to engage LEP populations using techniques such as the development of public notices in appropriate non-English languages that will provide contact information where individuals can be informed of the service or fare changes in order to provide comments and express any questions or concerns. City Staff will make every effort to provide at least one representative fluent in Spanish at public meetings and workshops to communicate with the Spanish-speaking population. Translators are available for those who wish to communicate in any other language with 48 hours' notice. To request this service, LEP persons may call (626) 744-4055 or visit the transit counter at 221 E. Walnut St. Suite 199, Pasadena, CA 91101. Information on how to request a translator is included in every public notice in Spanish, Chinese and Armenian per the Language Assistance Plan.

### **VI. Low-income Populations**

Reasonable efforts will be made to ensure low-income populations in the service area are given every opportunity to provide input on transit projects and changes to avoid disproportionate harm, or lack of benefit, of said projects and changes. These efforts may include, but not be limited to, holding public meetings in segments of the service area with large low-income populations, outreach with community members at inclusive public events such as BBQs and block parties. The City strives for inclusivity in all community events.

### **VII. Conclusion**

This Plan will be available for review on the City of Pasadena Transit Division website, <http://www.pasadenatransit.net> and at the Transit Division office. If materials are requested in LEP languages, Braille, and/or large type, staff will make every effort to accommodate those needs unless the request causes the City an undue financial or administrative burden. Members of the public can also obtain information about the Plan by contacting the Transit Division by phone at (626) 744-4055 or at the City of Pasadena Transit Division offices, 221 E. Walnut St. Suite 199, Pasadena, CA 91101.

## **Title VI Facility Construction History**

**City of Pasadena Transit Division**

The City of Pasadena Transit Division has not initiated the construction of a new transit facility within the past three years.

# Service Standards and Policies

## City of Pasadena Transit Division

The City of Pasadena Transit Division, responsible for the planning and operation of Pasadena Transit and Pasadena Dial-A-Ride, is committed to ensuring that no person is excluded from participation in, or denied the benefits of its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964. In addition to Title VI of the Civil Rights Act of 1964, the City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation.

As part of compliance with Federal Title VI regulations, all transit providers that are recipients of federal funding are required to establish “system-wide service standards and system-wide service policies, whether existing or new (i.e. adopted by the transit provider since the last Title VI submission),” as described in Circular FTA C 4702.1B, effective October 1, 2012. This document sets to fulfill all requirements of this mandate, as well as provide City of Pasadena Transit Division (“City”) staff with an effective tool for monitoring service and implementing future services based on criteria that are not discriminatory with regards to the attributes above.

This document is divided into two components, per FTA guidance. “Service Standards” are quantitative measures for effective and equitable operation of the City’s public transit services. “Service Policies” are written guidelines that will influence City decision-making based on relevant service indicators.

### Service Standards

#### Vehicle Load for Each Mode

Vehicle load is defined as “the ratio of passengers to the total number of seats on a vehicle.” (Chap IV-5) The City strives to maintain an acceptable balance between passenger comfort and efficient allocation of resources by maintaining a vehicle load standard on both local and feeder routes. Due to resource constraints, the City realizes that during peak-period trips, not all customers will be able to find a seat on the vehicle. However, these vehicle loads are considered acceptable as long as the number of customers on the vehicle both seated and standing does not exceed the vehicle manufacturer guidelines. As such, the City further differentiates between peak and off-peak acceptable vehicle loads.

Route Type	Peak Vehicle Load Standard	Off-Peak Vehicle Load Standard
Local	1.5	1.0
Feeder	1.0	1.0

The City reserves the right to review and update this policy as necessary based on variables such as demand and available resources.

For Dial-A-Ride vehicles, the City states an acceptable vehicle load as 100% of seated capacity.

#### Vehicle Headway

Vehicle headway is defined as “The amount of time between two vehicles traveling the same direction on a given line or combination of lines.” (Chap. IV-5) As a local transit operator that primarily serves as a

circulator and feeder system, the City schedules service with regard to variables such as peak and off-peak travel patterns to regional transit connections, major business/employment hubs, and other trip generators such as educational institutions and shopping areas. As such, vehicle headways can vary greatly based on route and time of day. Below are the current “average” headways for each route. For the purposes of this analysis, “peak” trips are trips that begin between the hours of 6 to 9 AM or 3 to 6 PM, while “off-peak” trips are trips that operate at any other time in the day. These numbers are effective August 2019.

**Current Route Headways (as of August 2019)**

Route	Weekdays	Saturdays	Sundays
10	18 min	18 min	18 min
20	20 min	31 min	31 min
31/32	Peak 23 min, Off-Peak 24 min	30 min	30 min
40	Peak 15 min, Off-Peak 28 min	32 min	32 min
51/52	Peak 35 min, Off-Peak 60 min	22 min (Limited 51 Rt.)	22 min (Limited 51 Rt)
60	49 min	No service	No Service

**Span of Service**

Fixed Route	
<b>Weekdays</b>	6:00 AM to 8:00 PM*
General time span of all routes is approximately 6:00 AM to 8:00 PM	
<b>Saturdays</b>	7:30 AM to 8:00 PM
Rt 51 begins at 7:30 AM	
Rts 20 & 31/32 begin at 10:30 AM	
Rts 10 & 40 begin at 11:00 AM	
<b>Sundays</b>	7:15 AM to 5:30 PM
Rt 20 begins at 7:15 AM	
Rt 51 begins at 7:30 AM	
Rts 31/32 & 40 begin at 8:00 AM	
Rt 10 begins at 8:30 AM	

No service on New Year’s Day, Memorial Day, Fourth of July, Labor Day, Thanksgiving, Christmas.

Dial-A-Ride	
<b>Weekdays</b>	7:00 AM to 8:30 PM
<b>Saturdays, Christmas Eve, New Year’s Eve</b>	9:00 AM to 6:30 PM
<b>Sundays</b>	7:00 AM to 6:30 PM

No service on New Year’s Day, Memorial Day, Independence Day (July 4<sup>th</sup>), Labor Day, Thanksgiving Day, and Christmas Day.



### **On-Time Performance Standards**

The FTA defines on-time performance as “a measure of runs completed as scheduled.” (Chap. IV-5) The City defines a vehicle as being “on time” if it leaves a stop no sooner than one minute before the scheduled time and no later than five (5) minutes after the scheduled departure time for fixed routes, and a 20-minute window of 5 minutes before and 15 minutes after the scheduled pick-up time on Dial-A-Ride. The City uses 85% compliance on fixed routes and 90% compliance on Dial-A-Ride as acceptable on-time performance measurements.

On-time performance is monitored by the following methods:

- Fixed Route: Vehicle arrival information system reporting, which is compiled and tracked on an ongoing basis.
- Dial-A-Ride: review and log of driver manifests for two highest-traveled days of each calendar month.

### **Service Availability**

Service availability is defined as, “A general measure of the distribution of routes within a transit provider’s service area.” (Chap IV-6) Currently, 90% of the housing units in the City of Pasadena are within a ¼ mile walk of a bus stop, which is a commonly accepted bus stop spacing standard in the industry, especially for local routes such as those run by the City (City of Pasadena General Plan Metrics Report, 2010).

## **Service Policies**

### **Distribution of Amenities**

Pasadena Transit serves 395 bus stops as of August 2019. The City Transit Division coordinates with other city departments on the maintenance and upkeep of passenger bus stop facilities.

The City strives to equitably distribute amenities in its service area. The City places passenger amenities, including shelters, benches, trash receptacles and schedule information or Busfinders (machines installed at bus stops which provide real time arrival information at the push of a button) at stops with the highest number of passengers including, but not limited to, transfer points and high traffic destinations. Furthermore, the City aims to provide amenities at stops near certain areas such as senior centers, hospitals/medical facilities, and shopping areas.

Distribution of passenger amenities at bus zones is also address in the City’s Street Design Guidelines (available to the public at <https://ww5.cityofpasadena.net/transportation/wp-content/uploads/sites/6/2017/05/Pasadena-Design-Guidelines-3-22-17.pdf>):

# PASADENA STREET DESIGN GUIDE

FIGURE 6-2 STOP HIERARCHY: MINIMUM RECOMMENDED PASSENGER AMENITIES BY STOP TYPE

Stop Type	Definition	Minimum Concrete ADA Area (5'x8')	Enhanced Concrete Area**	Shelter and/or Bench	Trash Receptacle	Real Time and/or Static Schedule Information***
<b>Heavy Use &amp; Time Points</b>	Scheduled time points or stops used on a consistent basis throughout the day that are not timepoints.		✓	✓	✓	✓
<b>Destination</b>	Specific destination where more transit use is encouraged, e.g. Old Pasadena, PCC, Caltech, etc.		✓	✓	✓	✓
<b>Support</b>	Typically located between Heavy Use and Destination stops along a route. Not heavily used, not specific destination, not scheduled timepoint.	✓				✓
<b>Transfer Point (Including stops that directly serve gold line stations)</b>	Transfer points fall into each of the categories above and may allow transfers between two routes or more than a dozen. Where there are a high number of transfer possibilities more amenities should be considered.		✓	✓	✓	✓

\*The width of the concrete area may span the amenity zone and the clear walk zone.

\*\*For stops at which a shelter is installed, the enhanced concrete area should be 27'x8'. For stops at which a bench and no shelter is installed, the enhanced concrete area should be 20'x8' sidewalk width.

\*\*\*Though resources do not allow for real-time information to be installed at all bus stops, it will generally be prioritized at heavily used stops.

## Vehicle Assignment for Each Mode

The City's current primary fixed-route vehicle fleet as of August 2019 is as follows (this does not include spare vehicles):

Make and Model	Year	Size	Number of Vehicles	Replacement Year
Ford Starcraft	2011	25' cutaway	4	2018
El Dorado EZ Rider II/BRT	2012	32' bus	10	2022
El Dorado EZ Rider II/BRT	2013	32' bus	7	2023
El Dorado EZ Rider II/BRT	2017	32' bus	4	2029
New Flyer/ Excelsior-XN35	2018	35' bus	4	2030

As a local transit operator with only 21 peak-hour dedicated fixed-route vehicles, the City strives to carry the maximum number of passengers possible while still ensuring an adequate amount of seats for riders. The City generally assigns vehicle types to routes based on route type as indicated in the chart below; however, the City's fleet size is limited, therefore vehicle type assignment to specific routes is subject to change depending on the maintenance schedule.

Route Type	Bus Type	Capacity	Passengers Per Hour Standard	Passengers Per Hour in FY 18*
<b>Local:</b> Rts. 20, 31/32, 40 <b>Feeder:</b> Rts. 10, 60, 88**	El Dorado (EZ-Rider II)	27 seated, 16 standing	26 10	29 14
<b>Local:</b> Rts. 20, 31/32, 40 <b>Feeder:</b> Rts. 10, 60	New Flyer/Excelsior- XN35	29 seats, 39 standing	26 10	29 14
<b>Feeder:</b> Rts. 51/52, 60	Ford Starcraft Cutaway	20 seated, 6 standing	10	14

\*Audited Fiscal Year 2018 Totals.

\*\*Six Month locally funded Pilot Program, three months in FY 18. Route has since been discontinued.

### Title VI Notice to Beneficiaries

The City of Pasadena Transit Division, responsible for the planning and operation of Pasadena Transit and Pasadena Dial-A-Ride, is committed to ensuring that no person is excluded from participation in, or denied the benefits of its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964. In addition to Title VI of the Civil Rights Act of 1964, the City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation.

## Membership of Non-Elected Committees for Title VI Purposes

### City of Pasadena Transit Division

The City of Pasadena currently has one advisory board regarding public transportation services, the non-elected Transportation Advisory Commission. Each commission member is appointed by a member of City Council. City Council members are elected by the general public according to district boundaries that are often influenced by protecting...

“existing and emerging communities of interest based upon demographic data which included age, ethnicity, and family type; socioeconomic data which included homeownership, poverty levels, educational attainment, and income patterns; information on neighborhood association areas, and public input on communities and neighborhoods.” (City of Pasadena Council Redistricting Task Force, 2011-12)

Furthermore, according to the City’s Municipal Code,

“City officials, when recommending or nominating persons to serve on city advisory bodies, shall seek outstanding individuals whose commitment and talents will contribute to the purposes and functions of the advisory body and who reflect the ethnic, geographic and gender diversity of the city.” (Pasadena Municipal Code Sec 2.45.010)

Below is a chart detailing the ethnicity of the City of Pasadena’s Transportation Advisory Commission (TAC) Members, as of August 2019.

City of Pasadena Transportation Advisory Commission (TAC)	Race of Pasadena TAC Members – For Title VI Purposes (as of August 2019)					
	Non-Hispanic White	Latino	African American	Asian American	Native American	Two or more races
At Large	X					
District 1	X					
District 2 (vacant)						
District 3		X				
District 4						X
District 5	X					
District 6	X					
District 7	X					
Mayor	x					

Potential commission members are recruited in the following manner:

1. Vacancy report is posted in the City Council Agenda, online and at City Hall
2. Government Code Section 54972 (Maddy Act) posting: An annual posting that is required is posted online on the Commissions webpage at <https://www.cityofpasadena.net/commissions/>
3. Individual Councilmember digital newsletters, mailings and announcements at District meetings

## Three-Year Summary of Outreach Efforts

### City of Pasadena Transit Division

Within the past three years (July 2016 to August 2019), the City of Pasadena Transit Division has engaged in the following outreach with citizens, riders, and other stakeholders:

- During this time frame for the Short Range Transit Plan (SRTP) process numerous general public meetings were conducted.
- Monthly Transportation Advisory Commissions which are open to the public, always invite public comments, and periodically include agenda items reported on by Transit staff.
- Presentations/participation by Transit staff at the Senior Commission, Parks and Recreation Commission, Northwest Commission, and Accessibility and Disability Commission meetings which are open to the public and always invite public comments.
- Participation by Transit staff at community events every year where transit information is disseminated to the public and staff is available to answer questions and receive comments.
- Participation by Transit staff at numerous rideshare fairs held by large employment sites or office parks every year where transit information is disseminated to the attendees and staff is available to answer questions and receive comments.
- Participation by Transit staff at social service outreach events, such as the Pasadena Older Adult Transportation Conference, Metro's Older Adult Transportation Expo, Conference on Healthy Aging, senior transportation fairs, and community center outreach events where transit information is disseminated to the public and staff is available to answer questions and receive comments.

## City Council Approval of Title VI Program and Related Documents City of Pasadena Transit Division

PLACEHOLDER - The Agenda Report to the Pasadena City Council and documentation of City Council's approval of the Title VI Program will be included here and submitted to LA Metro as part of the complete Title VI submittal.