



July 2016

City of Pasadena
Transit Division
Title VI Program

City of Pasadena Transit Division Title VI Program

Submitted July 2016

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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.

Para obtener más información o para llenar un formulario de queja, visite <http://www.cityofpasadena.net/pasadena-transit/title-vi/> o llame al (626) 744-4055.

要获得更多信息或填写投诉表格，请访问<http://www.cityofpasadena.net/pasadena-transit/title-vi/>或致电 (626) 744-4055.

Մտանալու համար Լրացուցիչ տեղեկությունների համար կամ լրացրեք ձեր բողոքը, այցելեք <http://www.cityofpasadena.net/pasadena-transit/title-vi/> կամ զանգահարել (626) 744-4055.

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 <http://www.cityofpasadena.net/pasadena-transit/title-vi/>.

Patrons with limited English proficiency who need assistance may visit <http://www.cityofpasadena.net/pasadena-transit/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 <http://www.cityofpasadena.net/pasadena-transit/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, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839.

Patrons with limited English proficiency that need assistance can also call the City Transit Division at (626) 744-4055.

Para obtener más información o para llenar un formulario de queja, visite <http://www.cityofpasadena.net/pasadena-transit/title-vi/> o llame al (626) 744-4055.

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Title VI Complaint Review Process

The Transit Division will review any Title VI complaint received to determine whether it is within City of Pasadena Transit Division jurisdiction based on whether or not the complainant has alleged discriminatory treatment or harassment based on race, color, or national origin. The City of Pasadena Transit Division also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation and will review any related complaint to determine jurisdiction accordingly.

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. All complaints will be investigated promptly.

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 following 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
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, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839.

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:	

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party:	
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

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

Signature and date required 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.

Limited English Proficiency (LEP) Plan
City of Pasadena Transit Division

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.

Four-Factor Analysis

In compliance with C 4702.1B guidance, the City conducted a "Four Factor Analysis to determine the specific language services that are appropriate to provide." Below are the results of the analysis conducted by the City for this Title VI Program LEP Plan being submitted in July 2016:

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

To determine this number, the City referred to demographic information provided by the U.S. Census Bureau. Data from the Census Bureau's American Community Survey (2010-14) indicates that the population of the City of Pasadena above 5 years of age is 130,611. From this total, residents were divided by language into those who can speak English "very well" or "less than very well." For the purposes of determining the number of LEP persons eligible to be served by Pasadena Transit Division services, this analysis focuses on those who speak English "less than very well," in accordance with the formal definition of LEP persons from the FTA. The analysis results showed that of the various languages spoken in Pasadena, three 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, and Chinese meet the LEP "Safe Harbor" threshold, as shown in the table below:

Total City Population 5 Years and Older			130,611
LEP "Safe Harbor" Threshold Languages	Total	Speak English "Less Than Very Well"	Percentage of Total Population
Spanish	36,586	15,717	12.0%
Chinese	5,884	3,039	2.3%
Armenian	4,530	1,215	0.9%

The City then determined, based on the numbers provided by the Census, the appropriate level of language assistance needed for each safe harbor group. A higher number of LEP persons per language generally means a higher level of assistance needs to be provided. City staff will work with other City departments, as well as agencies that often come into direct contact with these populations, in order to ascertain the appropriate level of language assistance needed.

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

The City Transit Division conducted on-board surveys in 2014 and 2016 to assess passenger characteristics on selected Pasadena Transit routes. 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. On a daily basis, front line staff has regular interaction with Spanish-speaking individuals.

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. Analyze updated census data to identify the percentage of LEP persons in the service area.
2. Continue to utilize ridership surveys from transit planning or marketing studies to identify the percent of transit users that are LEP persons.
3. Survey staff members who interact with the public, such as drivers and workers at the transit counter, about their experience concerning any contacts with LEP persons during the previous year.

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 currently provides resources to each LEP group while maintaining cost efficiency for taxpayers. Resources may include, but are not limited to:

1. Bilingual or multi-lingual staff members (the City's Transit Division currently has staff members who are fluent in Spanish)
2. Professional translation services (can be implemented quickly with minimal cost)
3. On-call translation services (can be implemented quickly)
4. Input by various community organizations that regularly interact with LEP populations (ongoing basis)
5. Printing services for vital documents, brochures, and other media
 - Essential documents such as Title VI forms, Dial-A-Ride applications, proposed service/fare changes, and certain scheduling information is made available in the identified languages per the LEP analysis. The City attempts to use universal symbols such as pictures, maps, and diagrams when feasible to streamline communication

among all language groups.

6. Documents, brochures, and other media of less essential importance shall be translated into the identified languages per the LEP analysis upon request
7. Multi-lingual services and resources offered and utilized by other City departments (available upon request)

Methods of Outreach

For the languages identified in the Four Factor Analysis, the City implements the following:

1. Vital documents including, but not limited to, Title VI Notice to Beneficiaries, Title VI Complaint Form, and Title VI Complaint Procedures are available in Spanish, Chinese, and Armenian.
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 and the LEP Plan identified language resources, if available, which may include a variety of media outlets, including the City's website, newspapers, Twitter, community outreach flyers or newsletters, etc.
5. All public meeting notices contain the following verbiage in English and the LEP Plan identified languages:
 - a. *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.*
6. Pictographs are used whenever possible to instruct and depict necessary information and procedures.
7. 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.
8. 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.
9. All customer surveys are in English and Spanish, and in the other languages per the LEP analysis upon request with advanced notice.
10. Oral translation services shall be provided upon request.
11. Any other translation request, provided it does not create an undue financial or administrative burden.

Notices of Availability

The availability of language assistance for LEP persons shall be posted in the following locations on applicable materials, as noted above:

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

4. Public meeting agendas created by the Transit Division
5. Printed bus schedules

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

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 2015, Pasadena Transit served over 1.5 million passenger trips, 61,000 revenue service hours, and 627,000 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.

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, the City of Pasadena Citizen Service Center (available online and as a smartphone app), and the City of Pasadena 311 hotline. 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.

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 City of Pasadena Transit Division, 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 July 2016.

Current Route Headways (as of July 2016)

Route	Weekdays	Saturdays
10	Peak 15 min, Off-Peak 18 min	18 min
20	Peak 22 min, Off-Peak 22 min	33 min
31/32	Peak 23 min, Off-Peak 24 min	30 min
40	Peak 23 min, Off-Peak 33 min	31 min
51/52	Peak 35 min, Off-Peak 60 min	22 min (Limited 51 Route)
60	Peak 49 min, No off-peak svc.	No service

Span of Service

Fixed Route

Weekdays	6:00 AM to 8:00 PM
Saturdays (Rts 10-40 begin at 11:00 AM; Rt 51 begins at 7:30 AM)	11:00 AM to 8:00 PM

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

Dial-A-Ride

Weekdays	7:00 AM to 8:30 PM
Saturdays, Christmas Eve, New Year’s Eve	9:00 AM to 6:30 PM
Sundays	7:00 AM to 6:30 PM

No service on New Year’s Day, Memorial Day, Independence Day (July 4th), 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 July 2016. The City Transit Division coordinates with other city departments on the maintenance and upkeep of passenger bus stop facilities.

The table below indicates the amenities currently found at Pasadena Transit bus stops as of the last review of amenities in 2016.

Amenity	Pasadena Transit Stops	Percentage of Total Stops	Percentage of Stops in Minority Census Tracts*
Bench	182	46.1%	53.6%
Shelter	65	16.5%	19.6%
Trash Receptacle	172	43.5%	52.7%
Schedule Information Display (Static or Real-Time)	102	25.8%	27.7%

**Based on 2010 Census. The Pasadena Transit service area (defined by Census tracts in any jurisdiction that includes a Pasadena Transit stop) is 62.2% minority, thus making Census tracts above 62.2% minority fall into the "Minority" category.*

The City strives to equitably distribute amenities in its service area. Schedule information displays are usually located in central business districts which are not located in minority tracts. The City aims to place passenger amenities at stops with the highest number of passengers or where formal requests have been made by passengers. Furthermore, the City aims to provide amenities at stops near certain areas such as senior centers, hospitals/medical facilities, and shopping areas. Ultimate decisions on placement of amenities are made on a case-by-case basis.

Vehicle Assignment for Each Mode

The City's current primary fixed-route vehicle fleet as of July 2016 is as follows (this does not include spare vehicles):

Make and Model	Year	Size	Number of Vehicles	Replacement Year
Ford Starcraft	2011	25' cutaway	6	2018
El Dorado EZ Rider II/BRT	2012	32' bus	10	2022
El Dorado EZ Rider II/BRT	2013	32' bus	7	2023

As a local transit operator with only 19 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 15*
Local: Rts. 20, 31/32, 40	El Dorado (EZ-Rider II)	27 seated, 16 standing	26	32
Feeder: Rts. 10, 51/52, 60	Ford Starcraft Cutaway	20 seated, 6 standing	10	11

*Audited Fiscal Year 2015 Totals.

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 July 2016.

City of Pasadena Transportation Advisory Commission (TAC)	Race of Pasadena TAC Members - For Title VI Purposes (as of June 2016)					
	Non-Hispanic White	Latino	African-American	Asian-American	Native-American	Two-or-More Races
At Large	X					
District 1 (Vacant)						
District 2	X					
District 3	X					
District 4	X					
District 5 (Vacant)						
District 6	X					
District 7	X					
Mayor	X					

Three-Year Summary of Outreach Efforts
City of Pasadena Transit Division

Within the past three years (July 2013 to June 2016), the City of Pasadena Transit Division has engaged in the following outreach with citizens, riders, and other stakeholders:

- 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 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 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.
- Participation by Transit staff who conducted a Pasadena Transit on-board passenger survey information where transit user information was collected and staff was available to answer questions and receive comments. Both English and Spanish-speaking staff participated.

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

The Agenda Report to the Pasadena City Council and documentation of City Council's approval of the Title VI Program are included here.