ATTACHMENT A



August 2025

City of Pasadena Transit Division Title VI Program

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Submitted August 2025

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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
- Analysis of Limited English Proficiency population in Pasadena's service area including Pasadena, San Marino, La Cañada Flintridge, Los Angeles, and unincorporated areas of Los Angeles County (including Altadena and East San Gabriel) and its interaction with Pasadena's public transit system
- 4. Language Assistance Plan for the Limited English Proficiency population
- 5. Public Participation Plan
- 6. Facility Construction History
- 7. Service Standards and Policies, including load factor, headways and distribution of amenities
- 8. Membership of non-elected committees
- 9. Summary of outreach efforts
- 10. City Council approval of Title VI plan (for submittal to Los Angeles County Metropolitan Transportation Authority [Metro])

Title VI Notice to Beneficiaries

The following text is posted on Pasadena Transit and Pasadena Dial-A-Ride vehicles fleet wide, as well as at the public counter at the Pasadena Transit/Pasadena Dial-A-Ride administrative office. The notice is posted in English, Spanish, Chinese, Armenian, Korean, and Tagalog.

<u>Title VI Notice to Beneficiaries</u> 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 examples of the postings:



Figure 1: Example of Title VI Notice on Pasadena Transit and Dial-A-Ride vehicles



Figure 2: Photo of Title VI Posting at Pasadena Transit and Pasadena 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.cityof pasadena.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/o llame al (626) 744-4055.

Figure 3: 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. The complaint form is translated into Spanish, Chinese, Armenian, Tagalog, Vietnamese and Korean and posted on pasadenatransit.net/title-vi/.

Title VI Complaint Filing Procedures

Any person who believes they may have been aggrieved by any unlawful discriminatory practice by Pasadena Transit or Pasadena 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/.

Patrons with limited English proficiency who need assistance may visit <u>pasadenatransit.net/title-vi/</u> 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 210, Pasadena, CA 91101, Attn: Transit Manager or an online Civil Rights Complaint Form may be accessed at the Pasadena Transit Division website at 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, 1200 New Jersey Ave., SE, Washington DC, 20590.

<u>Title VI Complaint Review Process</u>

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 the City's contracted transit operator staff and/or City staff. The complainant will receive notification informing them 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 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 an 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, they 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 principal 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.

Availability

These Title VI policies and procedures are to be posted:

- 1) On the Pasadena Transit Division website (translations provided per Language Assistance 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 Language Assistance 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.

Civil Rights Complaint Form

Below is Pasadena's Title VI Complaint Form which is posted online at <u>pasadenatransit.net/title-vi/</u>. The form is available on the website in Spanish, Chinese, Armenian, Korean, Vietnamese and Tagalog.

<u>Civil Rights Complaint Form</u> 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, 1200 New Jersey Ave., SE Washington, DC, 20590

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

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

Please confirm t behalf of a third		btained the permission	of the aggrieved p	arty if you a	re filing on
Yes	i party.	No			
Section III	crimination Lev	perienced was based or	(circle all that an	ahr):	
		ř		Jiy).	•
Race	Color	National Origin	Sex		Age
Disability	Religion	Medical Condition	Marital Status	Sexual	Orientation
Date of Alleged	Discrimination	(mm/dd/yyyy):		1	1
Section IV Have you previo		e VI complaint with the	City of Pasadena?		
	ously filed a Titlo Yes	e VI complaint with the	City of Pasadena?	No	
		e VI complaint with the	City of Pasadena?	No	
Have you previous Section V Have you filed t	Yes his complaint w	rith any other Federal, S		No Yes	No
Have you previous Section V Have you filed to	Yes his complaint w with any Feden		tate, or		No
Have you previous Section V Have you filed to	Yes his complaint w with any Feden	vith any other Federal, S al or State court? or court of all that apply	tate, or		No
Section V Have you filed to local agency, or If yes, provide n	Yes his complaint w with any Feden	vith any other Federal, S al or State court? or court of all that apply	tate, or		No
Section V Have you filed to local agency, or If yes, provide n Federal Agency	Yes his complaint w with any Feden	vith any other Federal, S al or State court? or court of all that apply	tate, or r: leral Court		No
Section V Have you filed ti local agency, or If yes, provide n Federal Agency State Agency Local Agency	Yes his complaint with any Feder ame of agency	vith any other Federal, S al or State court? or court of all that apply	tate, or r: leral Court ate Court	Yes	
Section V Have you filed to local agency, or If yes, provide na Federal Agency State Agency Local Agency Please provide in filed.	Yes his complaint with any Feder ame of agency	vith any other Federal, S al or State court? or court of all that apply Fed	tate, or ! leral Court ate Court he agency/court w	Yes	
Section V Have you filed ti local agency, or If yes, provide n Federal Agency State Agency Local Agency	Yes his complaint with any Feder ame of agency	rith any other Federal, S al or State court? or court of all that apply Fed St out a contact person at t	tate, or r: leral Court ate Court	Yes	

complaint.	ials or other information that you think is relevant to your
Signature and date below.	
Signature	
	at the address below, or mail this form to:
Transit Manager/ Customer Relatio City of Pasadena Transit Division	ins
221 E. Walnut St., Suite 210	
Pasadena, CA 91101	
	le VI Notice to Beneficiaries, Investigation Process, and Title VI <u>isadenatransit.net</u> or inquire in person at the address listed above
	language, please call (626) 744-4055.
	dioma, por favor llame al (626) 744-4055.
如果信息是需要用另一种语言,i Each in Each lineagh in with no	肩蚁电 (626) 744-4055. սժեշտ 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 (LAP) 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 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 LAP, including the Four Factor Analysis, which provides an analysis of Limited English Persons (LEP) 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 LAP.

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 (unincorporated Los Angeles County). As of December 2024, Pasadena Transit also operates in the Los Angeles neighborhood of Highland Park and provides minimal service in La Cañada Flintridge, thus expanding the service area. Pasadena Dial-A-Ride serves the City of San Marino and unincorporated Los Angeles County, specifically unincorporated San Gabriel and Altadena, in addition to the City of Pasadena. The total population for the service area is 262,874 according to the most up-to-date American Community Survey (2018-23). 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 five.

The table below shows the various languages spoken by those who live in the service area, as well as the proportion of residents who speak English "less than very well" in each language group compared to the total service area population.

Non-English Languages Spoken in Service Area	Total	Percentage
Population 5 years and over (2019)	262,874	
People who speak English "less than very well"; LEP	45,682	17.4%
lep: Spanish	21,975	8.4%
lep: Chinese (incl. Mandarin, Cantonese)	14,755	5.6%
lep: Other Indo-European languages	2,724	1.0%
lep: other Asian and Pacific island languages	1,642	0.6%
lep: Tagalog (incl. Filipino)	1,482	0.6%
lep: Korean	1,442	0.5%
lep: Vietnamese	531	0.2%
lep: Arabic	404	0.2%
lep: French / Haitian / Cajun	235	0.1%
lep: Other and unspecified languages	177	0.1%
lep: German / other West Germanic languages	171	0.1%
lep: Russian / Polish / other Slavic languages (%)	144	0.1%

Beginning in 2016, the Census Bureau made changes to the way that language data is displayed. Due to the large number of recognized languages, the Census Bureau collapses languages into manageable categories to reduce data errors and to secure the privacy of respondents, especially of those living in small towns and/or rural areas where only a few people may speak a given language. As such, all reported languages are placed under one of four language group classifications for Census questions regarding language use at home: "Spanish," "Other Indo-European languages," "Asian and Pacific Island languages," and "All other languages." Additionally, some non-English languages such as Spanish, French, and Chinese are individually recognized in Census tables as they are more widely spoken relative to other non-English languages. These languages are reflected on the tables in this section, which aids Pasadena Transit's efforts to ensure speakers of all major language groups can access its services.

Source: https://www.census.gov/topics/population/language-use/about.html

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 LAP following the Four Factor Analysis. The analysis results showed that of the various languages spoken in the service area, six language groups had over 1,000 speakers who could speak English "less than very well," thus meeting the FTA's "Safe Harbor Provision" threshold.

Based on the results from the American Community Survey, the languages of Spanish, Chinese, Tagalog, Korean, "other Indo-European languages," and "other Asian and Pacific Island languages" meet the LEP Safe Harbor Provision threshold, as shown in the table below:

Languages Meeting Safe Harbor Provision Threshold	Total	Percentage
lep: Spanish	21,975	8.4%
lep: Chinese (incl. Mandarin, Cantonese)	14,755	5.6%
lep: Other Indo-European languages	2,724	1.0%
lep: Other Asian and Pacific Island languages	1,642	0.6%
lep: Tagalog (incl. Filipino)	1,482	0.6%
lep: Korean	1,442	0.5%

Of the six identified language groups, two are group classifications that include multiple languages. In a previous Title VI analysis, Armenian was identified as meeting the threshold and it is assumed that the "Other Indo European languages" encompasses Armenian.

The Census Bureau broadly defines "other Asian and Pacific Island languages," as there are over 15 languages such as Japanese, Hmong, and Thai that fall under this language classification. This language group met the Safe Harbor Provision threshold in the previous Title VI report, but analysis in the additional factors did not identify a specific language from this category.

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

The City of Pasadena Department of Transportation Transit Division operates both Pasadena Transit fixed-route bus service and Pasadena Dial-A-Ride, a paratransit service for older adults at least 60 years old and individuals with an Access Services membership or LACTOA Disabled Reduced Fare TAP card within the service area. In Fiscal Year 2024, Pasadena Transit ridership was nearly 1.2 million and Pasadena Dial-A-Ride ridership was nearly 81,000.

The Transit Division has a public window and phone line that customers can utilize to apply for Pasadena Dial-A-Ride membership, obtain transit route planning assistance, and/or ask other questions about Pasadena's transit services. Customers can also call a Dispatch line, operated by the City's transit services contractor, to make Pasadena Dial-A-Ride appointments or request other information about transit services. LEP persons can interact with bus operators, dispatchers making Pasadena Dial-A-Ride appointments, operations supervisors, or any Transit Division staff member working the front window or answering phones. LEP individuals can also be encountered at outreach events or public meetings.

Pasadena Administrative Office staff encounters Spanish speakers on a regular basis and other languages, including Mandarin Chinese and Armenian, less frequently. The table below displays language data in relation to calls and in-person visits received by the Administrative Office throughout the 2024 calendar year. As made evident by the table, most callers and visitors communicate in English. Spanish-speaking individuals comprise a significant number of inquiries, especially relative to the other languages of Chinese and Armenian, which make up less than one percent of inquiries, even when

combined. Dispatch staff also reports receiving calls regularlyl from Spanish speakers. City of Pasadena Transit staff and Dispatch staff have several bilingual (Spanish-English) speakers to address requests.

This data supports the findings of Factor One, as Spanish-, Chinese-, and Armenian-language inquiries correlate with the three most common non-English languages in Pasadena.

However, it is important to note that calls and in-person visits to the Administrative Office are one of several means in which Pasadena Transit engages its users and not representative of all engagement with LEP populations. Furthermore, the findings of Factor Two do not completely represent all characteristics of service users, as it is very likely other non-English speakers utilize City of Pasadena transit services regularly, which may not be captured by the methods of this section.

Language Data for Calls and In-Person Visits (2024)				
	Count	Percentage		
One language				
English	2,212	93.14%		
Spanish	142	5.98%		
Chinese	17	0.72%		
Armenian	1	0.04%		
More than one language				
English/Spanish	2	0.08%		
English/Chinese	1	0.04%		
Total	2,375	100.00%		

Pasadena's Transit Division also reached out to other City departments to assess their contact with LEP individuals. The City of Pasadena maintains the City Service Center (CSC), a one-stop shop for any number of requests regarding City services, 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 accepts and receives calls in multiple languages, including Spanish, Chinese, and Armenian. CSC staff includes two-Spanish speaking individuals and utilizes the City's list of bilingual employees to provide support in other languages.

The CSC tracks calls internally in English and Spanish and reported a significant volume of calls from Spanish speakers in the 2024 calendar year. Specifically, the CSC received 2,819 Spanish-language calls during that period, resulting in an average of 54 calls per week. The CSC also relays information related to Pasadena Transit services, events, and forums via their website, mobile app, and other platforms. Other City departments, such as Human Services and Recreation and the Library, report that if they service non-English speakers, they speak Spanish.

In preparation for the City's Short Range Transit Plan (SRTP) update, the Transit Division conducted an on-board and online survey for Pasadena Transit fixed-route bus services in late 2024. The survey gauged rider sentiments and usage patterns on the City's fixed-route system and received over 1,300 responses over a three-month period. The survey was only completed in English and Spanish, although it was available in other languages. A survey was also conducted for the Pasadena Dial-A-Ride service, in which registered users of the service were sent survey forms via mail and asked to return to the Administrative Office. Similar to the on-board and online survey for users of the City's fixed-route bus service, the survey gauged rider characteristics and sentiments regarding Pasadena Dial-A-Ride. The

form was sent in both English and Spanish, and of the 170 forms that were returned, six (3.5%) were in Spanish.

The Transit Division also hosted a series of six workshops in Spring 2024 in support of this effort. Two of these workshops were conducted in Spanish, drawing in a total of 14 participants. Across the six SRTP workshops, a total of 67 participants attended, at least 20.9% of which were Spanish speakers. This indicates that Spanish-speaking individuals came into contact with the City's transit services at a frequency that is greater than the proportion of Spanish-speaking individuals who speak English less than very well (8.4%).

Finally, Pasadena Transit staff coordinates closely with several senior living facilities and day care centers, such as The Concord and Sunflower Day Care, 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.

Generally, the results of Factor Two support Factor One, in that the most common LEP language encountered is Spanish and to a lesser frequency Chinese and Armenian. Section 2 of the LAP 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.

The services provided by this department include fixed-route bus service (via Pasadena Transit buses) and Pasadena Dial-A-Ride which play a vital role in the lives of many residents of Pasadena and the service area. Pasadena Transit's services are a crucial means of access for households and individuals without a private vehicle, individuals who cannot drive, individuals with disabilities, and other mobility-impaired individuals. Public transportation is a vital service as it allows individuals to get to and from key destinations, such as school, work, grocery stores, medical centers, and other activity centers. Coupled with housing, transportation costs can make up about half of a household's total expenses, which presents significant challenges to low-income households that may be forced to make difficult spending decisions. However, research shows that transportation costs are reduced in areas where transit is easily and readily accessible, which indicates the importance of quality public transportation services. (Source: https://nlihc.org/sites/default/files/Another_Look_at_Location_Affordability_Understanding_t he_Detailed_Effects_of_Income_and_Urban_Form_on_Housing_and_Transportation_Expenditures.pdf)

Pasadena Transit fixed-route bus routes include connections to the Los Angeles regional transit network including the Metro A Line, local and regional Metro bus lines, as well as Foothill Transit bus lines. These regional services reach most major job centers in Southern California and connect to other local and regional transit hubs such as Union Station and the 7th Street/Metro Center station in downtown Los Angeles, thereby providing riders access to high quality transit service.

Within Pasadena, buses 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. Pasadena Transit routes travel through many of the City's residential areas as well, with a majority of household located within a quarter-mile walk from a bus stop. Should

users have trouble accessing fixed-route bus service due to a disability or age, they may rely on the Pasadena Dial-A-Ride service, which provides curb to curb service by appointment to eligible individuals in the service area.

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, Armenian and other languages) (no cost)
 - For oral translation and interpretation 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, Pasadena 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
 - Translation services via an on demand language line, if in office staff members are unavailable
- 3. Relationships with community organizations that regularly interact with LEP persons who can help disseminate information about Pasadena Transit services and Pasadena Dial-A-Ride. Pasadena has identified the following organizations and resources to work with on outreach to LEP communities including:
 - Pasadena Parks, Recreation, and Community Services (PARCS) Department facilities and recreation centers
 - Non-profit organizations serving youth populations, including Jivalagian Youth Center (2242 E. Foothill Blvd.) and Flintridge Center (236 W. Mountain St. Suite 106)
 - Living facilities and day care centers for high number of LEP Chinese speakers, including The Concord, Pilgrim Towers and Sunflower Day Care
 - Culturally specific newspapers including La Opinion (Spanish-language) and Asbarez (Armenian-language)
 - School districts in the service area (i.e. Pasadena Unified School School District, small portion of the Los Angeles Unified School District in Highland Park and Northeast Los Angeles)
- 4. Collaboration with multilingual services and resources offered and utilized by other City departments (available upon request). Examples below:
 - Culturally specific programming through the Pasadena Public Libraries or Pasadena Parks, Recreation, and Community Services

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.
- 3. The City of Pasadena maintains a list of certified employees that can be consulted for translation that speak Spanish, Mandarin Chinese, Armenian, and other languages.
- 4. The City's Language Line may also be utilized for languages not spoken by the City's list certified employees, or in cases where no one is available to provide translation in said languages.

Translation of documents including Vital Documents:

- Vital documents (including Title VI Notice to Beneficiaries and Title VI Complaint Form) are available in Spanish, Chinese, Armenian, Korean, Tagalog and Vietnamese. All versions are available on <u>pasadenatransit.net/title-vi/</u>. The Pasadena Dial-A-Ride brochure and application have also been translated and are available at: https://www.cityofpasadena.net/pasadena-transit/dial-a-ride/
- 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, Pasadena Dial-A-Ride applications, service brochures, and public meeting minutes and agendas.
- Service alerts are posted in English and Spanish for Pasadena Transit and Pasadena Dial-A-Ride service. Alerts are available for translation into other identified languages identified by the LAP 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, X (formerly 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, Armenian, 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 210, Pasadena, CA 91101.
- 5. Pictographs and other graphic-based outreach materials 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 (i.e. Spanish-language workshops), 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 LAP 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 Language Assistance 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 complaint.

Implementation of this training occurs every three years following approval of the City's Title VI program updates by the 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 pertinent information related to operations. 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, including interactions via phone calls;
- 2. Internal surveys of staff who are likely to engage with the public (including Dispatch and Operators);
- Analyze updated Census data to identify the percentage of LEP persons in the service area;
- 4. Continue to utilize ridership surveys from transit planning and/or marketing studies to identify the percent of transit users that are LEP persons;
- 5. Requests for translation

To better serve LEP populations within the service area, staff utilizes the following policies in monitoring and evaluating the effectiveness of the LAP:

- 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 interactions 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 Plan every three years in accordance with FTA regulations.
- 5. The City updates and revises the Plan based on any other changes in guidance or regulations at the federal, state, or local level.

All LAP changes are subject to approval by the Pasadena City Council.

Availability of this LAP

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

- 1. Transit Division counter at 221 E. Walnut St., Suite 210, 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 fixed-route circulator serving the City of Pasadena since 1994. In FY 2024, Pasadena Transit provided nearly 1.2 million passenger trips, over 70,000 revenue service hours, and over 724,000 revenue service miles within its service area in Pasadena, as well as Altadena and small portions of the cities of La Cañada Flintridge and Los Angeles. The City also offers curb-to-curb Pasadena Dial-A-Ride services for those over 60 or with an Access Services membership or a Persons with Disabilities Reduced Fare TAP Card within the cities of Pasadena and San Marino, as well as unincorporated areas in Los Angeles County in Altadena and San Gabriel. In FY 2024, DAR provided nearly 81,000 trips, over 23,000 revenue service hours, and nearly 211,000 revenue service miles. Pasadena Transit and Pasadena Dial-A-Ride services are operated by Transdev 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 (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 and/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, chambers 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

- Los Angeles Metro, Foothill Transit, and other connecting transit agencies
- Access Services, the regional paratransit provider in Los Angeles County
- 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 languages identified in the Plan available upon request, and with advanced notice. Meetings regarding service change threshold or fare changes would be translated into all languages identified in the Plan.

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 scheduled, 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. To facilitate access to these public forums, such meetings may be made accessible to residents and community members via virtual platforms such as Zoom.

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 are coordinated 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 Language Assistance 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 Administrative Office, 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 X (formerly Twitter), written and oral announcements at City public meetings, community newsletters, on City transit vehicles, and the City of Pasadena's 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 Language Assistance 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 other languages 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 210, 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

Low-income populations are more likely to use public transportation than other income groups and are also less likely to have access to a private automobile, indicating a need for service providers to accommodate their needs. In Pasadena, about 13 percent of residents are low-income, most of which are concentrated in North Central. Further, significant densities of low-income population residents can also be observed in Highland Park, which falls within the Pasadena Transit service area. In a ridership survey conducted in 2023 73 percent of riders were identified as low-income based on the income limits for Los Angeles Metro's LIFE program.

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 or 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 Language Assistance Plan-identified 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 210, Pasadena, CA 91101.

Title VI Facility Construction History

City of Pasadena Transit Division

The City of Pasadena is currently in the planning stages for two facilities to benefit transit services: the Transit Operations and Maintenance Facility and the Hydrogen Fueling Station.

TRANSIT OPERATIONS AND MAINTENANCE FACILITY

The City will construct a Transit Operations and Maintenance Facility (TOMF) located on City-owned adjoining parcels at 2180 East Foothill Boulevard and 2211 East Walnut Street. The project is currently in the design phase with construction planned to be completed before the current Pasadena Transit Operations and Maintenance Facility lease expires in 2028. The new TOMF will be designed with specialized ZEB charging stations, including the necessary infrastructure to support both battery-electric buses (BEBs) and fuel-cell electric buses (FCEBs).

Site Selection and Planning Process and Public Outreach Conducted

As the City has been operating its transit services out of a leased facility since the services began in 1994, a City-owned facility has been a priority. As needs for the transit operations exceeded the available leased space, it became necessary to develop a shovel ready project to assist in the search for available funding for a new facility. As such, a project was developed for the City-owned parcels noted above which are situated in a Commercial General (CG) Zoning District. It has been progressing in its design phases and through the environmental process. Public meetings related to the TOMF included a Design Commission meeting in October 2024, a public meeting in January 2025 to recommend the current site and discuss construction methods, and a public outreach meeting in May 2025 to provide an opportunity to receive public feedback and present the status of the project. Environmental Documents for a Categorical Exemption were submitted to the City's Planning Department for review in May 2025 and are still in review. This project is primarily funded through the Metro Measure R Mobility Improvement Program Grant.

Potential Sites Analyzed

This site was selected as it was one of the only viable locations within the City to place a facility with the size and purpose of the TOMF. The following criteria was developed to guide the search for an appropriate location for a facility. As Pasadena is generally built out, spaces to construct something like the TOMF were limited.

Site selection criteria:

- Located in an area of compatible land uses (preferably commercial or industrial).
- Located reasonably close to the points at which transit services begin and end revenue service.
- Large enough to support development of required facilities.
- Have provision of communications, water, electric and sewer service, or access to same.
- Free of hazardous wastes or capable of remediation.

This option identified and discussed above is cost effective and is an appropriate location to site such a facility. The area is zoned Commercial; previously a restaurant and auto body shop operated on the two locations. The 2180 East Foothill Boulevard was an existing City-owned property with an undetermined purpose. The City decided to purchase 2211 East Walnut Street to provide additional space for the TOMF when it became clear that the initial site was too constrained for the size and scope of the project.

Impact Analysis

The location for the TOMF was neither influenced by income and/or poverty status of the surrounding neighborhood or race, color or national origin. As described above, the location for the TOMF was not influenced by race, color or national origin of the surrounding neighborhood. However, the demographic data gathered from the 2020 US Census support that there is not an impact based on race, color and national origin. The minority population of Pasadena is 63% in the City of Pasadena, but is 56% in the census tract surrounding the TOMF.

According to Census data, about 37% of Pasadena households reported incomes at or below HUD's very low-income threshold of \$56,750 for the 2023 fiscal year. The census tract surrounding the TOMF displayed similar characteristics, with 38% of tract households reporting incomes at or below the same threshold.

HYDROGEN FUELING STATION

To support the City's transition to hydrogen fuel cell buses by 2037, a hydrogen fueling station is planned to be constructed on City-owned property at 159 South Kinneloa Avenue. The City is currently in the public outreach stage. The station will include an above-ground fuel storage and two dispensers, mechanical equipment enclosure, additional bus parking and various site improvements to enhance accessibility and traffic safety. Starting in 2027, it is anticipated that 17 buses will fuel at this site daily, increasing to 25 buses in 2030, and up to 45 buses by 2037. The hydrogen storage tank will be refilled as needed during business hours. This facility will be dedicated solely to Pasadena Transit buses and will not be accessible to the public.

The project is partially funded through the Transit and Intercity Rail Capital Program (TIRCP) that is overseen by the California State Transportation Agency (CalSTA) and administered by the California Department of Transportation (Caltrans); and the Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles (EnerglIZE), which is funded by the California Energy Commission's Clean Transportation Program and implemented by CALSTART, Inc.

Site Selection and Planning Process and Public Outreach Conducted

The City conducted a feasibility study in 2023 to assess the suitability of three City owned sites in Pasadena. Of the three sites analyzed, the Kinneloa site was found to be preferable. Of the other two sites, one was found infeasible, and one was found feasible with drawbacks. Main considerations for selecting a site appropriate for the facility are size, clear from hazards, and accessibility for hydrogen delivery vehicles and the bus fleet. The City has been actively engaging with the community about the project and its location. Public meetings were held in August and September 2024 to introduce the project and gather initial feedback. In March 2025, the current site was recommended at a public meeting that also considered construction methods. Another public meeting was held in April 2025 to allow for more feedback. A CEQA Statutory Exemption was filed in April 2025.

Impact Analysis

As described above, the location for the Hydrogen Fueling Station was not influenced by race, color or national origin of the surrounding neighborhood. However, the demographic data gathered from the 2020 US Census show that there is not an impact based on race, color and national origin. The minority population in the City of Pasadena is 63%, but is 61% in the census tract surrounding the Hydrogen Fueling Station.

As with the TOMF, income characteristics were not a determining factor for the location of the Hydrogen Fueling Station. Of the households in this tract, 37% reported incomes at or below HUD's very low-income threshold, which is identical to the proportion of overall households in the City.

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.

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

Pasadena Transit 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 offpeak 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 June 2025.

Current Pasadena Transit Route Headways (as of August 2025)

Route	Weekdays	Saturdays	Sundays
10	20 min	20 min	20 min
20	20 min	33 min	30 min
31/32	29 min	35 min	35 min
33	35 min	33 min	33 min
40	24 min	30 min	30 min
51/52	Peak 34 min, Off-Peak 60 min	22 min (Limited Rt. 51)	22 min (Limited Rt. 51)
53	31 min (peak hour service only)	No Service	No Service
60	45 min	No Service	No Service

Span of Service

Pasadena Transit Fixed-Route	
Weekdays	6:00 AM to 10:00 PM
General time span of all routes is approximately 6:00 AM to 8:00 PM	
Rt 33 ends at 10:00 PM	
Rts 53 & 60 only run during weekday AM and PM peak	
Saturdays	6:00 AM to 10:00 PM
General time span of all routes is approximately 10:30 AM to 8:00 PM	
Rt 33 starts at 6:00 AM and ends at 10:00 PM	
Rt 51 begins at 7:30 AM	
Sundays	7:00 AM to 5:00 PM
General time span of all routes is approximately 7:00 AM to 5:00 PM*	
Rt 33 starts at 6:00 AM and ends at 10:00 PM	

No service on New Year's Day, Memorial Day, Fourth of July, Labor Day, Thanksgiving, Christmas except Route 33 which runs a Sunday schedule.

Pasadena 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 Pasadena Transit fixed-route 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, and a 20-minute window of 5 minutes before and 15 minutes after the scheduled pick-up time on Pasadena Dial-A-Ride. The City uses 85% compliance on Pasadena Transit fixed-routes and 90% compliance on Pasadena Dial-A-Ride as acceptable on-time performance measurements.

On-time performance is monitored by the following methods:

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

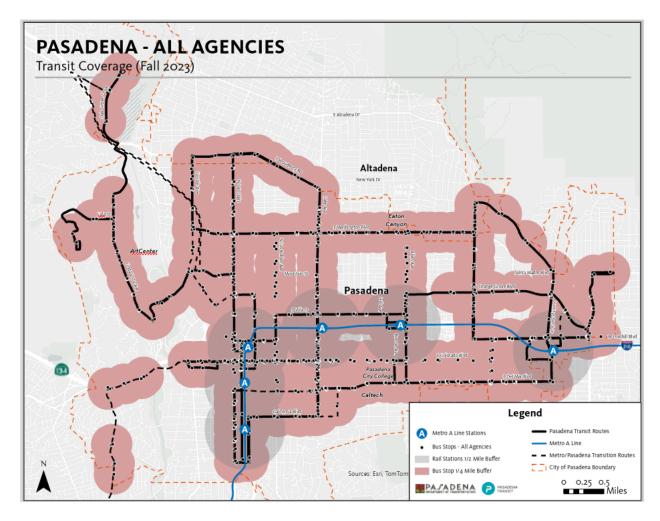
In FY 2025, Pasadena Transit maintained average on-time performance rate of 90.3% and Dial-A-Ride maintained an average on-time performance rate of 87.0%.

Service Availability and Bus Stop Spacing

Service availability for fixed-route services is defined as, "A general measure of the distribution of routes within a transit provider's service area." (Chap IV-6) As shown in the map below, most housing units in the City of Pasadena are within a ¼ mile walk of a bus stop.

Pasadena strives to maintain ¼ mile distance between bus stops along a route. Bus stops to serve local destinations, including schools, centers of employment, retail centers, public facilities including libraries, and hospitals, should be prioritized. This metric 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). The average bus stop spacing within the City is under ¼ of a mile. As the map displays below, there are very little gaps within the system of bus stops.

Given that the majority of Pasadena households are within a ¼-mile walk of a bus stop, it can be said that Pasadena maintains a high level of service availability.



Service Policies

Distribution of Amenities

As of August 2025, the City of Pasadena maintains 491 bus stops within its borders. The City Transit Division coordinates with other city departments on the maintenance and upkeep of passenger bus stop facilities. If the bus stop is outside of the City of Pasadena, Transit Division staff coordinates with the appropriate jurisdiction.

The City strives to equitably distribute amenities within Pasadena. 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, timepoints, transfer points and high traffic destinations. Furthermore, the City aims to provide amenities at stops near certain areas such as senior centers, hospitals and medical facilities, and shopping areas.

Distribution of passenger amenities at bus zones is also addressed in the City's Street Design Guidelines, which is 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***
Heavy Use & Time Points	Scheduled time points or stops used on a consistent basis throughout the day that are not timepoints.		√	✓	✓	√
Destination	Specific destination where more transit use is encouraged, e.g. Old Pasadena, PCC, Caltech, etc.		√	✓	✓	√
Support	Typically located between Heavy Use and Destination stops along a route. Not heavily used, not specific destination, not scheduled timepoint.	V				~
Transfer Point (including stops that directly serve gold line stations)	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.		√	√	1	v

^{&#}x27;The width of the concrete area may span the amenity zone and the clear walk zone

Vehicle Assignment for Each Mode

The City's current primary Pasadena Transit fixed-route vehicle fleet as of August 2025 is as follows (this does not include spare vehicles):

Make / Model	Model Year	Size	Fuel	Number of Vehicles	Replacement Year
Ford / Starcraft All-star	2011	25' cutaway	GAS	3	2019
El Dorado / EZ Rider II	2012	32' bus	RNG	10	2024
El Dorado / EZ Rider II	2013	32' bus	RNG	7	2026
El Dorado / EZ Rider II	2017	32' bus	RNG	4	2030
New Flyer / Xcelsior XN35	2018	35' bus	RNG	4	2030
New Flyer / Xcelsior XN35	2020	35'bus	RNG	2	2032
New Flyer / Xcelsior XN35	2024	35' bus	RNG	9	2036
New Flyer / Xcelsior XE35	2024	35' bus	EV	1	2036
Ford / Starcraft All-star*	2024	25' cutaway	RNG	2	2035

^{*}Vehicles to enter service by Fall 2025

As a local transit operator with only 28 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. For example, smaller buses are assigned to Routes 51/52 and 60 due to route conditions that are not amenable to larger buses. However, the City's fleet size is limited, therefore vehicle type assignment to specific routes is subject to change depending on the maintenance schedule.

[&]quot;For stops at which a shelter is installed, the enhanced concrete area should be 27x8". For stops at which a bench and no shelter is installed, the enhanced concrete area should be 20'x8". sidewalk width

[&]quot;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

Bus Type	Passenger Capacity	Pasadena Transit Route Type	Passengers Per Hour Standard	Passengers Per Hour in FY 24*
El Dorado / EZ- Rider II	27 seated 16 standing	Local: Route 20, 31/32, 33, 40, 53	26	24
		Feeder: Route 10, 60	10	9
New Flyer / Xcelsior Models	29 seats 39 standing	Local : Route 20, 31/32, 33, 40, 53	26	24
		Feeder: Route 10, 60	10	9
Ford Starcraft Cutaway	20 seated 6 standing	Feeder: Route 51/52, 60	10	8

^{*}Audited Fiscal Year 2024 Totals.

The City's Pasadena Dial-A-Ride vehicle fleet as of August 2025 is as follows:

Make / Model	Model Year	Size	Fuel Type	Number of Vehicles	Replacement Year
Ford / Starcraft All-Star	2009	23' cutaway	GAS	2	2016
Dodge / Caravan SE	2017	17' van	GAS	2	2021
Ford / Starcraft All-Star	2017	23' cutaway	GAS	7	2025
Ford / Starcraft All-Star	2019	23' cutaway	GAS	4	2027
Dodge / ProMaster 1500	2023	17' van	GAS	3	2029
Endera / Model B4*	2025	23' cutaway	EV	1	2032

^{*}Vehicle to enter service by Winter 2025

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 nonelected 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 2025.

	Race of Pasadena TAC Members – For Title VI Purposes (as of July 2025)							
	Non- Hispanic White	Latino	African American	Asian American	Native American	Two or more races	Not reported	
City of Pasadena Transportation Advisory Commission (TAC)	1			1			7	

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 (September 2022 – August 2025), 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 the Senior Commission, Parks and Recreation Commission, Northwest Commission, Environmental Advisory 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

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