

CITY OF COMMERCE

TRANSPORTATION DEPARTMENT



TITLE VI – PROGRAM POLICY

2018-2020

Updated January 16, 2018

Prepared/Approved by:

Claude McFerguson
Director of Transportation

Table of Contents

Introduction and Background	1
General Requirements	1
A. Notice of Rights	1
B. Complaint Process	1
C. List of Title VI Investigations, Complaints or Lawsuits	3
D. Public Participation	3
E. Limited English Proficiency	3
F. Non-Elected Officials	4
G. Sub-recipient Monitoring	4
H. Certification and Assurances	5
I. Construction Impact Analysis	5
Demographics	5
A. Racial Distribution	5
B. Racial Distribution Chart	6
Service Requirements	6
A. Short Range Transit Plan	6
B. Mission Statement	6
Service Overview	9
A. Vehicle Load	10
B. Vehicle Assignment	10
C. Vehicle Headway	10
D. On-Time Performance	10
E. Fixed-Route Performance Measures	11
F. Transit Access	11
Requirement to Monitor Service	11
A. Compliance Procedures	11
B. Service and Fare Changes	12
C. Disparate Impact Policy	13
D. Disproportionate Burden Policy	14
E. Poverty Guidelines	14
F. Information Dissemination	15

Appendix A - Title VI Notice of Rights

Appendix B - Title VI Complaint Form

Appendix C - Public Participation Plan

Appendix D – Limited English Proficiency (LEP) Policy and Implementation Plan

Appendix E – System Map and Line Schedules

Revised: January 3, 2018

Reference: FTA Circular 4702.1B Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients.

Background: As a recipient of Federal Transit Administration (FTA) funds, the City of Commerce is required to adhere to the Title VI regulations (49 CFR part 21) and to integrate into its Title VI Program considerations expressed in the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibility to Limited English Proficient Persons (70 FR 74087, December 14, 2005). **In addition, the Title VI Program has been updated to include new provisions mandated by the FTA Circular 4702.1B on October 1, 2012.** Moreover, the procedures contained herein will assure that no person is excluded from participation in, or denied the benefits of its services, with regard to fares, routing, scheduling, or quality of transportation service on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. Further, the frequency of service, age and quality of the Commerce vehicles assigned to routes, quality of Commerce bus stops, and location of routes will not be determined on the basis of race, color or national origin.

General Requirements: The City of Commerce Transportation Department adheres to the Title VI regulations (49 CFR Part 21) and ensures that the public is well advised of Title VI Policy and Complaint Procedure in this regard.

Notice of Rights

The *Title VI Notice of Rights* document is included in the Department of Transportation Operator's Manual, is reflected in the agency's website and displayed on interior bus cards (Appendix A). The document states the following: City of Commerce Transportation Department (together, hereinafter, referred to as "CTD"), is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that CTD furnishes, on the basis of race, color or national origin. In addition, the frequency of service, age and quality of CTD vehicles assigned to routes, quality of CTD bus stops, and location of routes will not be determined on the basis of race, color or national origin. CTD also maintains a brochure that details the *Title VI Notice of Rights* afforded under the Civil Rights Act of 1964; explains Title VI and the programs encompassed therein; identifies discriminatory actions; and describes the complaint process, as well as the role of the Department of Justice who coordinates the enforcement of Title VI.

Complaint Process

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a Title VI complaint with CTD. CTD employs a zero tolerance policy relative to alleged acts of discrimination and posts the process for filing a complaint on the Department of Transportation website. The Title VI Complaint Form (Appendix B) may be printed from the www.ci.commerce.ca.us website or may also be requested from CTD Customer Service who can be reached at (323) 887-4419. The complaint form is available in English and Spanish.

The Title VI Complaint Form is also available for pickup at the Transportation Department, 5555 Jillson Street, Commerce, CA 90040. The completed form must be returned to Transportation Department, Transit Operations, 5555 Jillson Street, Commerce, CA 90040.

Complaints should be filed within one hundred and eighty (180) days of the date of the alleged discrimination and should include the following information:

1. Complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
2. Description of how, when, where, and why complainant believes the discrimination occurred. In addition, the location, names, and contact information of any witnesses should also be included.

In addition to the CTD Title VI Complaint Process, a complainant may file a Title VI complaint directly with the:

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105-1839

Complainants may also file a Title VI complaint with an external entity such as the Department of Justice, other Federal or State agency, or a Federal or State court. However, should a complaint be filed with CTD and an external entity simultaneously, the external complaint will supersede the CTD complaint and CTD's complaint procedures will be suspended pending the external entity's findings. All complaints alleging discrimination based on race, color or national origin relative to a service or benefit provided by CTD will be recorded. CTD staff will forward the Title VI complaint to the Director of Transportation and will provide appropriate assistance to complainant(s), including those persons with disabilities, or who are limited in their ability to communicate in English. CTD will make every effort to resolve such complaints in a quick and expeditious manner.

In instances where additional information is needed for assessment or investigation of the complaint, CTD will contact the complainant within 15 working days. Failure of the complainant(s) to provide the requested information within the specified timeframe may result in the administrative closure of the complaint. CTD will investigate the complaint and prepare a response subject to review by CTD's Director of Transportation. If appropriate, CTD may administratively close the complaint and advise the complainant(s) of his / her right to file a complaint externally. The complainant(s) will also be advised of his / her right to appeal the response to Federal and State authorities as appropriate. CTD will employ every effort to respond to a Title VI complaint within sixty (60) working days of its receipt of such a complaint, unless a complaint is filed with CTD and an external entity simultaneously as noted previously.

CTD will send a final written response to the complainant(s) and advise the complainant(s) of his or her right to file a complaint externally. CTD will make every effort to respond to Title VI complaints within sixty (60) working days of its receipt of such complaints.

List of Title VI Investigations, Complaints or Lawsuits

As previously stated, CTD is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin. Accordingly, CTD has not had any Title VI investigations, complaints or lawsuits that allege discrimination by the City of Commerce with respect to service or other transit benefits since the previously submitted Title VI Program in 2011. CTD regularly affirms its moral and legal obligation to uphold the requirements of Title VI and includes an assessment / report of such in the annual Short Range Transportation Plan.

Public Participation Plan

In accordance with the current guidelines relative to Title VI, CTD has prepared a Public Participation Plan to promote public involvement in transit planning decision-making activities. This proposed plan will establish formal procedures that allow for, encourage, and monitor public participation within the CTD service area including, but not limited to, minority individuals, persons with Limited English Proficiency (LEP), and low-income populations. The CTD Public Participation Plan (Appendix C) describes proactive public outreach strategies and procedures. To that end, truly meaningful public involvement requires an informed public. Accordingly, it is CTD's policy to encourage the public to express their needs and concerns so that transportation decisions better reflect community values, interests and needs. Therefore, educating the public on transportation decisions relative to the CTD service area is at the forefront of public outreach activities.

Limited English Proficiency

Individuals, who have a limited ability to read, write, speak, or understand English are limited English proficient, or "LEP." According to the 2016 U.S. Census data for Los Angeles County, 58.2 percent of the individuals over the age of five (5) years spoke a language other than English in the home. Among limited English speakers, Spanish is the language most frequently spoken. Public transportation is often the primary means of achieving mobility for many LEP persons. As such, CTD strives to provide language assistance to such individuals in a competent and effective manner to ensure that transit services are safe, reliable, convenient, and accessible to those persons. Moreover, CTD makes an effort to improve mobility within its service area by providing transportation services in an equitable manner to all segments of society. CTD emphasizes the fair treatment of people of all races, cultures, and income levels, including minority and low income populations. To that end, CTD analyzed the language groups and English language proficiency of residents in the CTD service area for purposes of public outreach.

That data is also used to assist CTD in identifying the transportation needs of immigrant populations and ensuring that transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations. The *Four Factor Analysis* to improve access for LEP persons and the *Implementation Plan for Language Assistance* reflects identified needs.

In addition, CTD has implemented measures to ensure that information relative to the services provided is made available to customers who are Limited English Proficient as described below:

Public Information – CTD’s Route Brochures, which provide scheduling, route and fare information; Rider Alerts; Surveys and Public Notices are published in a bi-lingual format (English/Spanish). Spanish and English newspapers are used to publish hearing notices, as well as to provide information relative to the operation of CTD.

Customer Service Center

CTD’s Customer Service Center is well equipped to provide information to the community relative to the services that are provided. Bi-lingual staff is available to answer questions or accept comments related to CTD transportation services; bus fare information; lost and found; Commuter shuttle services, and Dial-A-Ride services.

Customers are able to visit or call the customer service staff Monday through Friday, 7:00 am to 5:00 pm, except on legal holidays. The Customer Service Center may also assist with trip planning and logging complaints.

Community Partners

CTD has established partnerships for purposes of promoting transportation services with various community businesses both within city boundaries, as well as in the neighboring communities in which service is provided to promote ridership and facilitate ease of public transportation services.

Service Change Information

Notices regarding public outreach meetings and hearings on service changes are published in English and Spanish newspapers; and all customer comments are welcomed by CTD.

Non-Elected Advisory Councils

At this time, CTD does not have a transit advisory group comprised of non-elected officials. Rather, the Transportation Ad-Hoc Committee comprised of two council members and the Department of Transportation Director, works collectively to maintain open channels of communication. In addition, the City has several commissions that occasionally discuss transit matters, including the *Traffic and Safety Commission*, the *Planning Commission*, and the *Culture and Recreation Commission*.

All City of Commerce commissions consist of five members, the majority of whom are minorities. Commission vacancies are advertised in English and Spanish newspapers to allow for equal representation.

Sub-recipient Monitoring

CTD does not currently have any sub-recipients. However, if the situation were to change in the future, any sub-recipient would be held to the same standard as the City of Commerce relative to Title VI regulations (49 CFR part 21).

Certification and Assurances

The Civil Rights Assurance and Title VI Assurance have been incorporated in the Annual Certification and Assurance submission to FTA; and the document has been uploaded into TEAM - the FTA database.

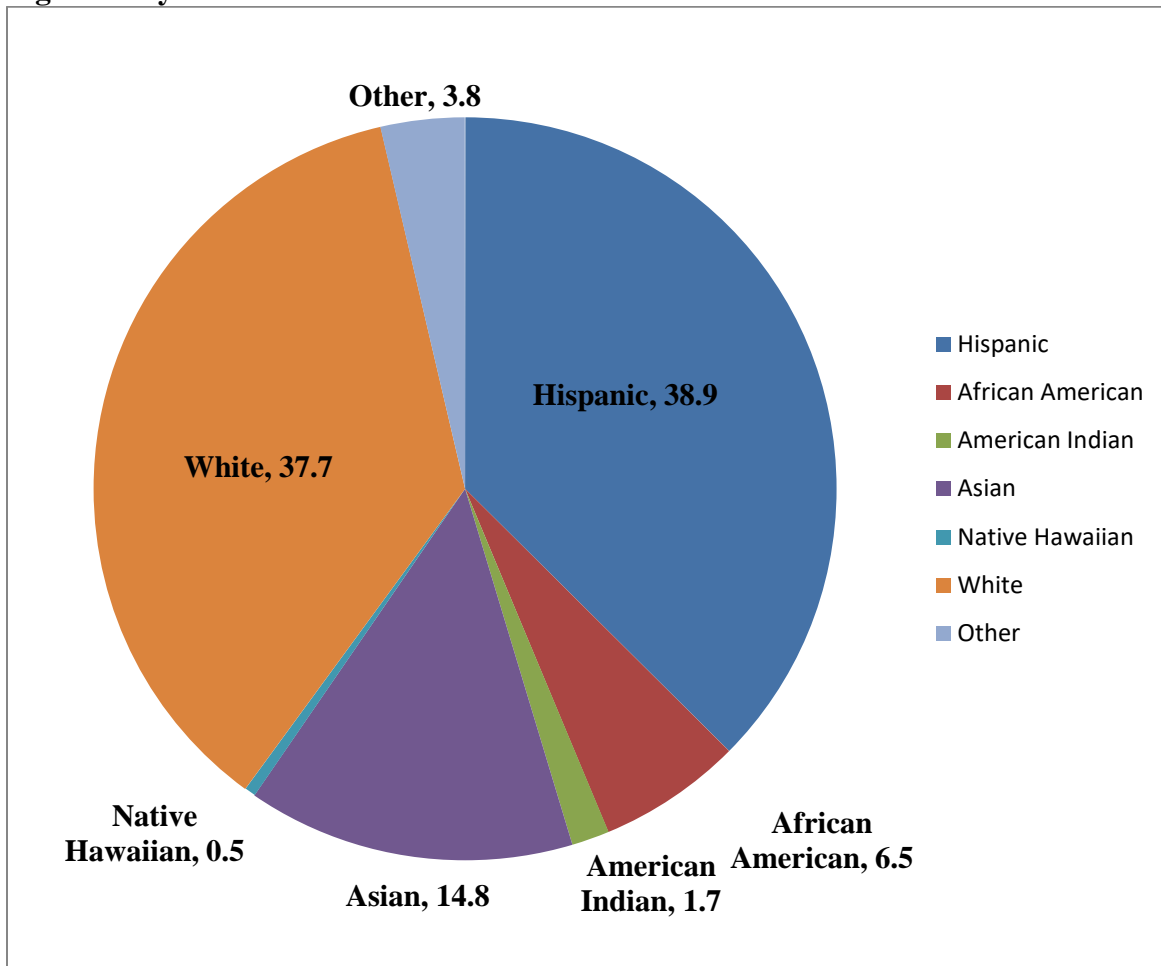
Construction Impact Analysis

CTD does not currently have any ongoing construction projects that impact transit operations or services. However, the floor in the maintenance shop area has exceeded its useful life and scheduled to be replaced in early 2018.

Racial Distribution

A large percent of the population served by CDT is Hispanic, accounting for 38.9 % of the population. Asians represent 14.8 %, White account for 37.7 of the population. The remaining ethnicities are reflected in Figure 1, System Racial Distribution.

Figure 1: System Racial Distribution



Source: 2016 Community Survey

The communities that connect via the CTD service area encompass the ethnicities as reflected in Table 1 below:

Table 1: Racial Distribution Chart

City / Ethnicity	White	African American	Hispanic	Asian	Native American	Other
Alhambra	8.7%	1.4%	33.5%	54.6%	0.1%	1.7%
Bell Gardens	2.2%	0.5%	96.0%	0.6%	0.2%	0.4%
Commerce	3.1%	1.1%	93.6%	1.2%	0.4%	0.6%
La Mirada	34.1%	2.3%	42.1%	18.6%	0.2%	2.6%
Los Angeles	26.3%	8.0%	48.7%	14.1%	0.2%	2.7%
Montebello	7.6%	0.7%	80.6%	10.2%	0.2%	0.7%
Monterey Park	4.2%	0.4%	25.9%	67.9%	0.1%	1.5%
Pico Rivera	4.3%	0.7%	91.7%	2.5%	0.2%	0.6%
Rosemead	3.6%	0.3%	30.5%	64.7%	0.1%	0.8%
San Gabriel	9.4%	0.9%	23.6%	64.3%	0.1%	1.6%
Santa Fe Springs	9.5%	2.5%	82.5%	4.0%	0.4%	1.1%
South Gate	2.7%	0.7%	95.3%	0.7%	0.1%	0.5%
Vernon	35.2%	8.8%	53.7%	1.8%	0.0%	0.4%
Whittier	23.8%	1.0%	67.9%	3.9%	0.2%	1.3%

Source SCAG 2017, Local Profiles of SCAG Member Jurisdictions

Service Requirements

In accordance with FTA obligations, the CTD Title VI Program reports on a variety of information and analyses to demonstrate compliance with the Title VI requirements as contained in the Civil Rights Act of 1964; and with other regulations governing the topic. Based upon FTA Circular 4702.1, the following information provides documentation demonstrating that CTD has followed Title VI and is indicative of the agency’s commitment to providing high-quality transportation services to all the communities within the CTD service area.

Short Range Transit Plan

The Short Range Transportation Plan (SRTP) is prepared primarily for purposes of detailing CTD’s vision and goals; and to ensure that all Federal, State and local reporting requirements are achieved, data collection efforts are coordinated, and that CTD’s budget is consistent with Los Angeles County Metropolitan Transportation Authority (Metro) planning policies and funding assumptions. The SRTP is presented to the City of Commerce Council at which time the community is afforded the opportunity to provide input; as well as to make inquiries.

CTD operates in accordance with its mission statement; and is guided by a set of goals and objectives that serve as the blueprint for the future of the agency.

Mission Statement – *“To provide safe, reliable, convenient and cost-effective transit services, with skilled team of employees, dedicated to meeting the needs of our community and providing excellent customer service.”*

Goal 1 – Develop strategies and administrative processes that support the long-term vision.

Objectives:

- Enhance financial tracking by maximizing the citywide automated financial system;
- Enhance the employee recruitment process; and
- Streamline the payroll production process.

Short-term: Continually to improve the existing transportation system.

Long-term: Integrate operations into the City’s new infrastructure and transportation plans.

- Continually review passenger riding trends and analysis to look for opportunities to fulfil the community’s unmet needs;
- Implement a Dial-A-Ride service for qualified elderly and special needs customers;
- Assess and revise existing Procedure Manuals (Grant Administration/Procurement) and maintain a master calendar for timely reporting and revision of mandatory programs (DBE, EEOP and Title VI)

Goal 2 – Meet and exceed customer expectations by providing safe, clean and reliable service.

Objectives:

- Provide safe, clean and user-friendly bus stops;
- Maintain and improve interior and exterior appearance of the fleet;
- Develop and maintain a user-friendly transit system;
- Expand access to customer information;
- Improve system reliability;
- Install and monitor the new security surveillance camera system at the Commerce Metrolink Station for increased passenger safety and security; and
- Distribute posters to various businesses throughout the City and provide detail information of the bus stops services by the 26th Street shuttle in an effort to increase ridership.

Goal 3 – Provide a network of services to Commerce and Southeastern Los Angeles County.

Objectives:

- Actively pursue options for increased transit connections
- Foster partnerships within Commerce and surrounding cities
- Ensure the continued free movement of buses and the people throughout the City
- Conduct planning and development research
- Operate high quality Dial-A-Ride service

- Operate the 26th Street Shuttle, a semi-fixed-route feeder service to and from the Commerce Metrolink Station.

Goal 4 – Use financial, technology, and human resources effectively and wisely.

Objectives:

- Maintain an aggressive training program to enhance employee professional development;
- Maintain effective communication and teamwork throughout the Transportation Department;
- Continually create opportunities for employees to work and learn together;
- Ensure that financial and management standards meet desired results;
- Implement an automated Vehicle Maintenance Management System Citywide;
- Enhance the Facility Maintenance Program;
- Update and refine the fleet replacement program/schedule (buses and vehicles);
- Maintain an effective AVL/ CAD System;
- Maintain and upgrade Automatic Passenger Counter System;
- Upgrade the bus and chassis wash to improve operational efficiency; and
- Develop a sustainable Transportation Facility Master Plan that addresses future growth and development.

CTD continuously strives to attain established goals and objectives set forth in the annual SRTP while fulfilling community interests and needs. In particular, public outreach is at the forefront of CTD activities which include but are not limited to:

Improved Customer Information Services and Amenities

- Continually upgrade website, social media sites and phone system to provide a more attractive, user-friendly and enhanced interface experience for patrons; while also providing an opportunity to provide feedback and make inquiries;
- Continued zero tolerance graffiti abatement program on fleet;
- Phase II of the Metrolink Revitalization Project will include upgrades to meet current Americans with Disabilities Act requirements; and
- Enhance existing transit mobile app to include additional passenger features.

Community Based Marketing

- Maintained a multi-year marketing plan designed to attract new riders, sustain existing ridership and promote public transportation as a viable transportation option.
- Redesigned printed materials, including electronic versions that display information in English and Spanish.
- Issued press releases to notify the community of various projects and accomplishments.
- Established new, and cultivated existing, public and private partnerships.

Community / Public Outreach

- Participated in several rideshares to promote CTD's services as a viable, convenient and cost effective mode of transportation.

- Maintain a program intended to create awareness and promote public transportation while enhancing the image of CTD. For example, CTD participated in the *Rider Relief Transportation Program* led by Los Angeles County Metropolitan Transportation Authority which provides fare subsidy coupons that allow low-income patrons to redeem toward transit passes for eligible riders including adult regular fare, Senior / Disabled/Medicare, K-12, and college / vocational students who meet the criteria.
- Adopted a “Passenger Perspective” to view issues from the passenger’s point of view; base decisions on increasing passenger ease and satisfaction to the extent feasible; and viewing the customer as the reason for being.

Service Overview

As previously stated, CTD provides public transportation connections within the City of Commerce and the surrounding communities of Alhambra, Bell Gardens, Boyle Heights, Monterey Park, Pico Rivera, Rosemead, San Marino and the unincorporated area of East Los Angeles. Services are also provided from Commerce to the Cities of Montebello, East Los Angeles, Whittier and Downtown Los Angeles. CTD operates seven fixed-route services; lines operate Monday through Friday as a basic service pattern. Lines Red, Green Yellow and Orange provide service on Saturdays and a Church/Shopper route that operate on Sundays.

Table 2 identifies the peak frequencies by service day for each of the respective CTD routes.

Line	Peak Service Frequency (in minutes)		
	Weekday	Saturday	Sunday
Red	45	60	----
Green	45	60	----
Yellow	60	----	----
Blue	45	60	----
Orange	60	----	----
Citadel Express	30	30	30
26th Street Shuttle	30	----	----

CTD operates a fleet of thirteen buses, including a contingency reserve fleet of two buses, comprised of all CNG powered buses. The entire fleet is equipped with wheelchair lifts, kneeling devices, radios, air conditioners, bike racks, security cameras and other standard operating equipment. In addition to the fixed-route service, CTD provides demand response Dial-A-Ride service for the elderly and disabled. Dial-A-Ride services are available between the hours of 7:00am – 5:00pm, five days a week, excluding including holidays. CTD also participates in the mandated para-transit transportation program for Los Angeles County provided by ACCESS Services, a local public entity established to meet the Americans with Disabilities Act.

Vehicle Load

CTD's fixed-route service utilizes standard coaches that are thirty-five (35) and forty (40) foot long, with seating capacity for twenty-nine and thirty-eight passengers respectively; standing load capacity is forty-one and thirty-seven respectively, with two wheelchair tie-down positions on each vehicle. To ensure that routes do not become overcrowded, upgraded frequencies are provided when the average route load exceeds the standard. Vehicle load factors are monitored through daily ridership data and strategic line-by-line analysis studies conducted by City staff.

CTD will conduct additional surveys if comments or complaints are received relative to overcrowding on a given route. Through diligent monitoring, CTD is able to maintain its vehicle load at acceptable standards. The latest line-by-line analysis study concluded that there is no significant overcrowding that warrants additional buses.

Vehicle Assignment

CTD coaches are assigned to each route based upon route-level capacity requirements. Higher seating capacity (38-seat) buses are assigned to the longest high volume lines with multiple peakload points. The 29-seat buses are generally assigned to lines with lighter loads. Aside from the length of the bus and the greater seating capacity of the larger buses, all vehicles are identical (including wheelchair lifts and air conditioning on all coaches), thereby providing the same amenities and accessibility features to all passengers in all serviced communities.

Vehicle Headway

Market demand, performance standards, and availability of resources generally determine the line-by-line headways. CTD has a very ambitious program to assess line-by-line load factors in order to determine whether higher frequencies are needed to meet the market demand. Currently, CTD has three service categories including, major local, minor local, and peak express. These categories are detailed as follows:

- Major Local Service (Lines Red, Green, Blue, and Citadel Express) – These lines run at high frequencies and cover a long service day, with service provided late into the evening and on weekends. They serve major travel corridors with intensive demand. The frequent service permits easy transferring between routes.
- Minor Local Service (Lines Yellow and Orange) – These lines generally run at lower frequencies than the major lines. This service provides access to major trip generators and serves corridors with less transit-supportive land use, compared to major local service corridors.
- Peak Express Service (26th Street Shuttle and Purple Route) – These lines provide weekday peak-hour express service from major activity centers and transit hubs in Commerce to downtown Los Angeles. The express service provides higher speed and limited stop service.

On-Time Performance

In addition to monitoring vehicle load, vehicle assignment, and vehicle headway, CTD has performance standards it relies upon to ensure that patrons receive quality services. Table 3 illustrates CTD's performance compared to the standard of key performance measures.

Table 3: Fixed-Route Performance Measurements

Measure	Performance
Cost Per Revenue Hour	\$119.89
Pay to Platform Hour Ratio	1.03 Hrs
Overtime Ratio: Operations	9.8%
Overtime Ratio: Maintenance	1.6%
Passenger Per Revenue Hour	19
On-Time Performance	85.3%
Buses on Hold	2
On-Time PM Inspections	99%

CTD currently has 66 bus stops within the City. Forty-six of these stops include shelters and the majority of the stops have solar lighting systems for safety and convenience. CTD recently completed installing Phase IV of the Bus Stop Improvement Project which entailed upgrading all bus stops and amenities within the City. Market demand determines the location and type of bus stop amenities installed. All bus stops within the City meet the requirements set forth in the Americans with Disabilities Act relative to the clearance dimensions for the location of the bus stop amenities. In addition, CTD is committed to providing its patrons with clean and safe waiting areas. As such, CTD recently hired a contractor for maintenance and custodial services of the bus stops to ensure that the bus stops are clean and safe for its patrons in all communities served.

Transit Access

CTD is housed in its own federally funded facility at 555 Jillson Street, Commerce CA 90040. The facility serves as CTD’s headquarters, bus division / yard and maintenance facility. The location is perfectly situated in the center of CTD’s service area and provides optimal access to manage its transit services; as such, the facility location does not result in a disparate impact. CTD provides fixed-route service to its patrons who predominately reside within ¼ mile of CTD routes. In many areas, Los Angeles County Metropolitan Transportation Authority (Metro), the regional operator, provides service within a city block of CTD, as well as duplicates service on some routes. Accordingly, the passenger is assured of accessible transportation. Moreover, CTD service has been implemented in response to identified needs regarding route alignment and headways. CTD has made every effort to provide access to all public transit users and shares this practice with the regional provider, Metro, who also ensures that there is an equal distribution of transit services throughout the region.

Requirement to Monitor Transit Service

In accordance with Title VI regulations, CTD monitors the performance of the system relative to system-wide service standards and policies.

Compliance Procedures

Every three years, a strategic line-by-line analysis is conducted on CTD’s fixed-route transit services. The *Line-By-Line Analysis of Transit Services and Market Survey* has the following objectives:

- ✓ Gather current service and patronage data to assist management and staff in evaluating current performance and planning future service.
- ✓ Assess system-wide operating ridership and performance.
- ✓ Conduct a detailed analysis at the route, route segment, time of day and day of week levels of current ridership and performance measures.
- ✓ Analyze intra and inter system transfer patterns.
- ✓ Assess the level of unmet mobility needs within the CTD service area.
- ✓ Present the findings of intercept surveys conducted at major bus stops and a random telephone survey of area residents.
- ✓ Develop a series of recommendations for improvements to CTD's fixed-route bus network.

The *Line-By-Line Analysis of Transit Services and Market Survey* provides detailed information on service effectiveness, ridership, capacity issues, passenger loads, route performance, and schedule adherence by the route level. This information provides CTD with the necessary data to ensure that vehicle load, assignment, and headway standards are met. The *Line-By-Line Analysis of Transit Services and Market Survey* also capture passenger-boarding detail, which assists CTD with the determination and placement of transit amenities. Unmet transit needs in the City of Commerce are documented by the *Line-By-Line Analysis of Transit Services and Market Survey* as well as by field observations, customer complaints, and suggestions.

Service and Fare Changes

Periodic service changes are needed to address changing ridership trends, population distribution, land use patterns, unmet transportation needs, and availability of resources. The FTA requires that funding recipients prepare and submit service and fare equity analyses for public comment in consideration of proposed major service or fare changes. Accordingly, CTD has established a threshold that defines a “major service change” and the definition of an ensuing adverse impact that would be created by a “major service change”.

Specifically, a major service change is defined by CTD as meeting one of the following criteria:

1. All proposed fare changes excluding ride free promotional events and services, and temporary fare reductions that are mitigating measures for other actions.
2. All promotional fare reductions remaining in effect after six (6) months.
3. Proposed service expansions and reductions including all routing and timetable changes remaining in effect after 12 months that exceed 20 percent of their current configurations.

If a proposed major service change falls within one of the three categories above, CTD will conduct a Title VI service and fare equity analysis for review and consideration by the City of Commerce Council and the public prior to implementing such changes. Proposed system-wide changes are then prepared in staff reports for City Council consideration. Public comments and City Council input formulate the administrative policies that provide equal accessibility and distribution of services to all riders.

An adverse effect is defined as a major geographical or time-based reduction in service which may include, but is not limited to, span of service changes, frequency changes, route segment elimination, re-routing, or route elimination. CTD shall consider the degree of adverse effects in the form of an equity analysis when planning major service changes.

The following types of service changes are exempt:

- Minor route alignment, frequency, span, or time point adjustments;
- Routing or bus stop changes due to temporary road detours caused by construction, maintenance, closures, emergencies, labor disruptions or strikes, fuel shortages, or safety concerns;
- Any temporary service addition, change, or discontinuation of a route with less than twelve months of operation;
- Changes on special service routes serving sporting events, special events, or service contracted through other cities or agencies;
- Any service change that does not meet the definition of a major service change described above.

Notwithstanding the considerations specified above, CTD is a fare free transit system; and there were no major service changes that occurred during the past three years. Moreover, CTD does not anticipate service changes over the next three years that will affect greater than 20% of service hours on any given route. However, if the situation were to change in the future, CTD would abide by all requirements relative to Title VI regulations (49 CFR part 21).

CTD management and planning staff hold monthly and weekly staff meetings to discuss service recommendations. Overall benefits, costs, and fair distribution of services are determined at the planning and programming stages. Proposed system-wide changes are then prepared in staff reports for City Council consideration. Public comments and City Council input formulate the administrative policies that provide equal accessibility and distribution of services to all riders.

Disparate Impact Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service or fare change are borne disproportionately by minority populations. For the purpose of this policy, a minority population is defined as any readily identifiable group of minority persons who live in geographical proximity, and if circumstances warrant, geographically dispersed / transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy, or activity.

CTD defines a “disparate impact” as occurring when an adverse effect of a major service or fare change on minority populations is at least 20 percent greater than the adverse effect on non-minority populations. In order to identify a potential impact, CTD will follow the process within the flow chart illustration. To that end, if a proposed major service change would result in a disparate impact, CTD will consider modifying the proposed change to avoid, minimize, or mitigate the disparate impact of the change.

If CTD finds potential disparate impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate potential disparate impacts, CTD will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts of the changes. If CTD chooses not to alter the proposed changes, CTD may implement the service or fare change if there is substantial legitimate justification for the change and CTD can show that there are no alternatives that would have less impact on the minority population and would still accomplish program goals.

Disproportionate Burden Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service or fare change are borne disproportionately by low-income populations. Low-income population is defined as any readily identifiable group or households who are at or below 150 percent of the U.S. Department of Health and Human Services Poverty Guidelines in Figure 2 below.

Figure 2: 2017 Poverty Guidelines

2017 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA

PERSONS IN FAMILY/HOUSEHOLD	POVERTY GUIDELINE
1	\$12,060
2	\$16,240
3	\$20,240
4	\$24,600
5	\$28,780
6	\$32,960
7	\$37,140
8	\$41,320

For Families/Households with more than 8 persons, add \$5,230 for each additional person.

Note:

The poverty guidelines (unlike the poverty thresholds) are designated by the year in which they are issued. For instance, the guidelines issued in January 2017 are designated the 2016 poverty guidelines. However, the 2017 HHS poverty guidelines only reflect price changes through calendar year 2016; accordingly, they are approximately equal to the Census Bureau poverty thresholds for calendar year 2016. The poverty guidelines may be formally referenced as “the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2).”

CTD defines a “disproportionate burden” as occurring when the low-income population adversely affected by a major service or fare change is 20 percent more than the average low-income population of CTD’s service area.

Similar to the approach in identifying a potential disparate impact, should a proposed major service or fare change result in a disproportionate burden, CTD will consider modifying the proposed change to avoid, minimize, or mitigate the disproportionate burden of the change.

If CTD finds potential disproportionate burdens and then modifies the proposed changes in order to avoid, minimize, or mitigate potential disproportionate burdens, CTD will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disproportionate burdens of the changes. If CTD chooses not to alter the proposed changes, CTD may implement the service or fare change if there is substantial legitimate justification for the change and CTD can demonstrate that there are no alternatives that would have less impact on the low-income population and would still accomplish program goals.

Information Dissemination

City staff disseminates bi-lingual information in advance of public meetings to allow for agendas to be prepared and made available for public review in community libraries and at Commerce City Hall. Public notices regarding public hearings are advertised in both English and Spanish newspapers, as well as posted at public facilities. Pamphlets are available on all buses, at Commerce City Hall, libraries and at several large retail centers (e.g., *The Citadel Outlets*). Outreach is also conducted with community groups at senior citizen centers, senior housing complexes, local school districts and other community venues; and notices are distributed to CTD patrons.

Conclusion

CTD is committed to its mission “*To provide safe, reliable, convenient and cost-effective transit services, with skilled team of employees, dedicated to meeting the needs of our community and providing excellent customer service.*” Further, the agency understands the need to align the mission with stated goals and objectives. In addition, CTD must accomplish said goals within the framework of established FTA regulations, in particular Title VI. CTD strives to promote fiscal responsibility and a culture of integrity, cultivates a work environment that fosters performance and high morale; and consistently works to enhance customer service. In doing so, CTD employees are focused and effective which leads to increased operational efficiency, higher revenues, sustained public trust and confidence while fulfilling community interests and needs; and accomplishing the mission of the organization.

APPENDIX A

Title VI Notice of Rights

The City of Commerce Municipal Bus Lines is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that CTD furnishes, on the basis of race, color or national origin. In addition, the frequency of service, age and quality of vehicles assigned to routes, quality of bus stops, and location of routes will not be determined on the basis of race, color or national origin.

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The Title VI Complaint Form may be printed from the www.ci.commerce.ca.us website or may also be requested from CTD Customer Service at (323) 887-4419. The Complaint Form is also available for pickup at the Department of Transportation, 5555 Jillson Street, Commerce, CA 90040. The complaint should include the following information:

1. Complainant's name, address, and how to contact you (i.e., telephone number, email address, etc.)
2. Description of how, when, where, and why complainant believes the discrimination occurred. In addition, the location, names, and contact information of any witnesses should also be included.

The completed form must be returned to:

Transportation Department
Attention: Director of Transportation
5555 Jillson Street
Commerce, CA 90040
(323) 887-4419

In addition to the Title VI complaint process at CTD, a complainant may file a Title VI complaint with the:

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105-1839.

Complainants may also file a Title VI complaint with an external entity such as the Department of Justice, other Federal or State agency, or a Federal or State court. However, should a complaint be filed with CTD and an external entity simultaneously, the external complaint will supersede the CTD complaint and CTD's complaint procedures will be suspended pending the external entity's findings.

APPENDIX B

TITLE VI COMPLAINT FORM

The City of Commerce Municipal Bus Lines is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that Commerce Municipal Bus Lines furnishes, on the basis of race, color, or national origin.

If you believe you have been discriminated against, you may file a signed written complaint within 180 days from the date of the alleged discrimination. The Title VI Complaint Form may be printed from the www.ci.commerce.ca.us website or may also be requested from CTD Customer Service who can be reached at (323) 887-4419. The Title VI Complaint Form is also available for pickup at the Transportation Department, 5555 Jillson Street, Commerce, CA. 90040. The completed form must be returned to Transportation Department, Director of Transportation, 5555 Jillson Street, Commerce, CA 90040.

Your Name: _____

Street Address, City, State, Zip Code: _____

Telephone Number: _____

Name of person discriminated against (if someone other than complainant: _____

Street Address, City, State, Zip Code: _____

Date of Incident: _____

Please describe the alleged discrimination incident. Provide the names and titles of all Commerce Municipal Bus Lines employees involved if available. Explain what happened and whom you believe was responsible. If necessary; use back of this form.

APPENDIX C

PUBLIC PARTICIPATION PLAN

INTRODUCTION AND PURPOSE

As a recipient of Federal Transit Administration (FTA) funds, the City of Commerce is required to adhere to the Title VI regulation (49 CFR part 21) and to integrate into its Title VI Program considerations expressed in the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibility to Limited English Proficient Persons (70 FR 74087, December 14, 2005). The revised Circular states that transit providers which operate 50 or more fixed-route vehicles in peak service and are located in urbanized areas (UZA) of populations of 200,000 or greater must approve a Public Participation Plan.

Accordingly, Commerce Municipal Bus Line's (CTD) Public Participation Plan strives 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 CTD service area 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.

GOALS AND OBJECTIVES

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

- To determine what non-English languages and / or other barriers may exist to public participation within the CTD service area.
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the CTD service area.
- To hold meetings in locations that are accessible and reasonably welcoming to all area residents, including, but not limited to, minority, LEP, and low-income members of the public.
- To utilize a variety of communication methods to capture public input from populations that is typically not likely to attend or engage in public meetings.

IDENTIFICATION OF STAKEHOLDERS

Stakeholders are those individuals who are either directly or indirectly affected by a plan, project, or program based on decisions related to recommendations or implementation actions. Those individuals 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.

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

- All thirteen (13) cities and unincorporated communities
- Community Partners
- Major Employers

- Major Colleges, Universities, and School Districts
- Metrolink
- Commerce City Commissions (Traffic and Safety, Planning, and Culture and Recreation)
- Commerce Chamber of Commerce
- Non-profit and private business community
- Other regional and municipal transit providers such as the Montebello Transit, Foothill Transit, Los Angeles Metropolitan Transportation Authority, and Norwalk Transit
- Public (including minority, LEP, and low-income populations)
- Southern California Association of Governments (SCAG)
- Transit Advocates (Los Angeles Marketing Exchange and Gateway Cities Transit Providers)

In the City of Commerce, CTD provides demand response Dial-A-Ride Services for the elderly and disabled which complements CTD’s fixed-route services. Additionally, CTD also participates in the mandated para-transit transportation program for Los Angeles County provided by ACCESS Services, a local public entity established to meet the Americans with Disabilities Act (ADA). CTD staff may also periodically meet with social service providers, transit advocates, public members, and other agencies as necessary.

DIRECT STAKEHOLDERS

According to the U.S. Census Bureau, 10,137,915 residents exist within Los Angeles County area as depicted in the Table 1 below:

Table 1: Demographic Profile for Los Angeles County

Category	Number	Percentage of
Total	10,137,915	100%
Hispanic / Latino	4,916,888	48.5%
White	2,575,030	25.4%
African American	922,550	9.1%
Native American / Alaskan Native	152,068	1.5%
Asian	1,530,825	15.1%
Native Hawaiian and Pacific Islander	40,551	0.4%

2% of the population identifies as two or more races.
 Source: U.S. Census Bureau, 2017 Census

Techniques utilized to engage the general population includes public notices of meetings in the local newspapers, on the CTD website, social media, written and oral announcements at City of Commerce Council meetings, and community meetings. Further, with the imminent installation of an innovative intelligent transportation system, CTD will strive to proactively engage members of the public with other cost-effective approaches utilizing a broad range of electronic messaging techniques.

MINORITY POPULATIONS

As indicated in Table 1 referenced above, minority populations comprise almost half of the percentage of the population in Los Angeles County. Hispanic / Latino individuals are the largest minority, with 48.5 percent of the total population. Asian and African American persons account for 15.1 percent and 9.1 percent of the population, respectively. A small number of Native American / Alaska Natives and Native Hawaiian and Pacific Islander individuals account for less than 2 percent each. Persons who consider themselves to be of more than one race account for 2.0 percent of the population.

LIMITED ENGLISH PROFICIENCY POPULATIONS

Consistent with CTD'S Limited English Proficiency (LEP) Policy and newly incorporated Language Assistance Plan, reasonable efforts will be made to engage LEP populations utilizing 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 affected project or services to provide input or comments. Other efforts may include conducting focus groups in concentrations of LEP populated areas for the purpose of gaining input from a particular defined portion of the community. In addition, non-profit organizations and other advocacy groups can be utilized to disseminate information to LEP populations. Such non-profit organizations, advocacy groups, or other organizations can provide insight into the needs of LEP populations.

LOW-INCOME POPULATIONS

To ensure that low-income households are not under-served, CTD will identify populations within the service area with a per capita income of 80 percent or less of the national average in order to establish low income thresholds. Low-income populations in the CTD service area should be given every reasonable opportunity to provide input on transportation plans and programs to avoid disproportionate harm; or lack of benefit of transportation programs and projects.

In summary, methods of gaining input either directly or indirectly from minority, LEP, and low-income population groups include a wider range of notification techniques, focus group meetings or informal interviews, if required; and the use of agency or advocacy group contacts through non-profit or private organizations.

PUBLIC COMMENT PROCESS FOR MAJOR SERVICE AND FARE CHANGES

In addition to the outreach efforts identified earlier in this plan, CTD will utilize the City of Commerce Council meetings to announce proposed major changes to services and fares. Accordingly, the public will be notified of proposed major service or fare changes resulting in increases or decreases as well as identified potential disparate or disproportionate burden impacts. In addition, public comments will be presented to the City of Commerce Council prior to approval of the proposed major service or fare change.

The following procedures, strategies, techniques, and media will be utilized to engage and notify the public in the public hearing process prior to the City of Commerce Council approval:

- Place printed materials on buses: interior cards, flyers, and / or comment cards describing the proposed changes.

- Information available on website.
- Social media outlets: email blasts, Facebook, Twitter.
- Press releases and meetings with local media representatives.
- Presentations to professional, citizen, and student organizations.
- User and non-user surveys.
- Use of various illustrative visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, maps, and the Internet.

CONCLUSION

This document will serve as the *Public Participation Plan* for CTD. The plan will be available for review on the CTD website, www.ci.commerce.ca.us, and at the Transportation Department Facility. If materials are requested in LEP languages, large type, and / or Braille, staff will make a reasonable attempt to accommodate those needs.

Members of the public can also obtain information about the plan by contacting CTD Customer Service by phone at (323) 887-4419; or via U.S. Postal Service: Transportation Department, Director of Transportation, 5555 Jillson Street, Commerce, CA 90040.

APPENDIX D

LIMITED ENGLISH PROFICIENCY (LEP) POLICY AND IMPLEMENTATION PLAN

LIMITED ENGLISH PROFICIENCY (LEP) POLICY

Pursuant to 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)”, Commerce Municipal Bus Lines (CTD) is federally mandated to develop and implement a Language Assistance Plan by which Limited English Proficiency (LEP) persons are able to meaningfully access translations of written and oral information; and to ensure that no person shall be discriminated against relative to services that CTD furnishes on the basis of race, color, or national origin.

A LEP person is defined as an individual limited by the ability to speak English less than “very well” or “not at all” as reported by the U.S. Census Bureau (Census). As CTD is a Federal Transit Administration (FTA) recipient receiving Federal financial assistance, CTD must take reasonable steps to ensure meaningful access to the benefits, services, information, and other relevant aspects of its programs and activities for LEP persons.

Four Factor Analysis

The purpose of this analysis is to ensure that no person shall be discriminated against with regard to fares, routing, scheduling, or quality of transportation services that Commerce furnishes, on the basis of race, color, or national origin under any program or activity receiving Federal financial assistance from the FTA.

Analysis Using Four Factor Framework

The City of Commerce Transportation Department has conducted The City of Commerce Transportation Department conducted this analysis to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP).

With respect to the “Four-Factor Analysis” as specified in the DOT LEP Guidance Handbook, CTD initiated the following:

I. Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

Task 1, Step 1: Examine prior experiences with LEP individuals

Commerce serves a diverse population. Bus operators and customer service staff report daily interactions with LEP persons, particularly persons speaking Spanish as their primary language.

The majority of interactions with LEP persons are requests for information relating to the use of transit services, including route, schedule, fare, and transfers.

Commerce frequently gets requests for LEP persons regarding Dial-A-Ride (Paratransit) services.

Task 1, Step 2: Become familiar with data from the U.S. Census

The U.S. Census 2009-2013 American Community Survey (ACS) describes languages spoken in Los Angeles County and number of individuals speaking each language as follows:

Language	Number of Speakers
English Only	3,991,721
Spanish	3,653,909
Chinese	174,385
Tagalog	227,658
Korean	183,007
Armenian	168,485
Vietnamese	80,624
Persian	72,908
Japanese	51,713
Russian	49,310
Arabic	43,544
French	38,633

Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves

The City of Commerce’s transit service operates almost exclusively in the City of Commerce. The bus routes touch the Cities of Bell Gardens, Montebello, and the unincorporated areas of East Los Angeles. The City’s service area is also illustrated in the map shown in the following section.

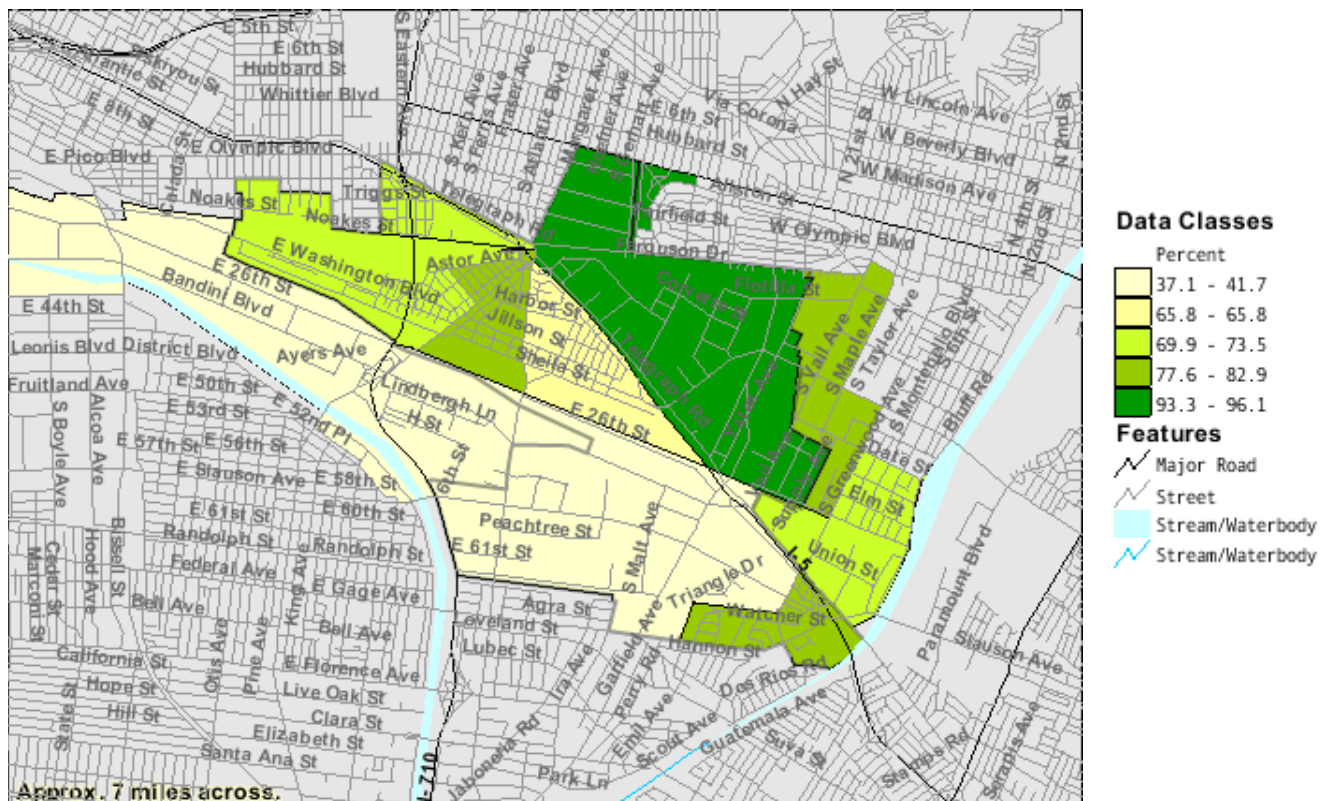
Task 1, Step 2B: Obtain Census data on the LEP population in your service area

Shown below is the ACS data on Language Spoken at Home by ability to Speak English for the Population 5 Years and over.

Language Spoke at Home- Population 5 years and over-City of Commerce	Estimate	Percent
English Only	2,785	23.1%
Language other than English	9,275	76.9%
Speaks English less than “very well”	4,299	35.6%
Spanish	9,149	75.9%
Speaks English less than “very well”	4,261	35.3%
Other Indo-European languages	106	0.9%
Speaks English less than “very well”	38	0.3%
Asian and Pacific Islander languages	20	0.2%
Speaks English less than “very well”	0	0.0%
Other languages	0	0.0%
Speaks English less than “very well”	0	0.0%

This information is shown geographically in the map shown below.

Language Spoken at Home by ability to Speak English for the Population 5 Years and over.



Task 1, Step 2C: Analyze the data you have collected

Limited English Proficiency is determined by adding those who speak English in all categories other than very well. Commerce's total population is 12,721. A total of 4,299 persons (35.3%) are identified with limited English proficiency. Of these persons 4,261 speak Spanish and 38 speak Asian and Pacific Islander languages.

Task 1, Step 2D: Identify any concentrations of LEP persons within your service area

The majority of Commerce patrons with LEP is Spanish speaking and resides in all areas of the City. This is shown in the map noted above.

Task 1, Step 3: Consult state and local sources of data

Data obtained from the Department of Labor supports the conclusion that Spanish speaking persons make up the majority of all persons not speaking English "very well" in Los Angeles County. LEP persons speaking Chinese, Korean, Persian and Tagalog are also well represented. While the data from the Department of Labor encompasses a much larger area than Commerce's service area, the data is anecdotally useful.

Task 1, Step 4: Reach out to community organizations that serve LEP persons

LEP persons are served by many organizations in Commerce and surrounding communities, including various school districts, government agencies, churches, and other community organizations.

Task 1, Step 4A: Identify community organizations

The Commerce Transportation Department is in contact with over twenty-seven community organizations that come in contact with LEP persons. These organizations include Asamblea Un Nuevo Comienzo, Auld Lang Syne Club, Boy Scouts-Troop #473, Commerce Aquatic Boosters Club, Commerce Evening Lions, Commerce Garden Club, Commerce Senior Citizens Club, Commerce Sister City Association, Commerce Social Club, First Baptist Church of Commerce, First Baptist Church of Commerce-Spanish Department, Model City Democratic Club of Commerce, New Life Family Church, Society of Our Lady of Guadalupe, St. Marcellinus Church Holy Name Society, United Family of Bristow, Voala-Community Head Start, Women's Club of Commerce, Woman's Club of Rosewood Park, American G.I. Forum, Cub Scout Pack #473, Door of Hope Community Center, Mt. Wilson Vista Girl Scout Troop #226, Organization for the Physically Impaired, Rosewood Park School PTA, Rotary Club of Rio Hondo/Bell Gardens/Commerce, and St. Marcellinus Confraternity of Christian Doctrine.

Task 1, Step 4B: Contact relevant community organizations

Commerce staff is in contact with the organizations listed in Step 4A as well as the Montebello Unified School District.

II. **Factor 2: The Frequency With Which LEP Individuals Come Into Contact With Your Programs, Activities, and Services**

Task 2, Step 1: Review the relevant programs, activities, and services you provide

LEP individuals inquire about the programs and services that Commerce provides on a daily basis. Operational services include fixed-routes, Dial-A-Ride (Paratransit), and excursion service. LEP individuals come into contact with Commerce staff by calling and emailing customer service staff and the Transportation Center. Additionally, LEP individuals visit the Transportation Center counter to inquire about services and programs.

Task 2, Step 2: Review information obtained from community organizations

As part of a future transit study, Commerce will conduct surveys on the frequency in which LEP individuals use transit service, and what modes of service or particular routes are used most frequently.

Task 2, Step 3: Consult directly with LEP persons

Almost all of the LEP persons that utilize Commerce transit services are Spanish speaking. The City continually interacts with community groups and will identify any new LEP groups that speak languages other than Spanish, and provide additional language assistance as necessary.

III. **Factor 3: The Importance to LEP Persons of Your Program, Activities and Services**

Task 3, Step 1: Identify your agency's most critical services

Commerce's most critical services include:

- Fixed Route transit service
- Dial-A-Ride Paratransit service
- Excursion service

If English is a barrier to using these services then the consequences for the individuals are serious, including limited access to obtain health care, education, employment, and faith-based institutions. Critical information from Commerce which can affect access includes:

- Route and Schedule information
- System rules and information about how to ride
- Public service announcements
- Safety and security announcements
- Complaint and commendation forms

- Web Pages
- Communication related to program changes
- Information about Dial-A-Ride Paratransit service

Task 3, Step 2: Review input from community organizations and LEP persons

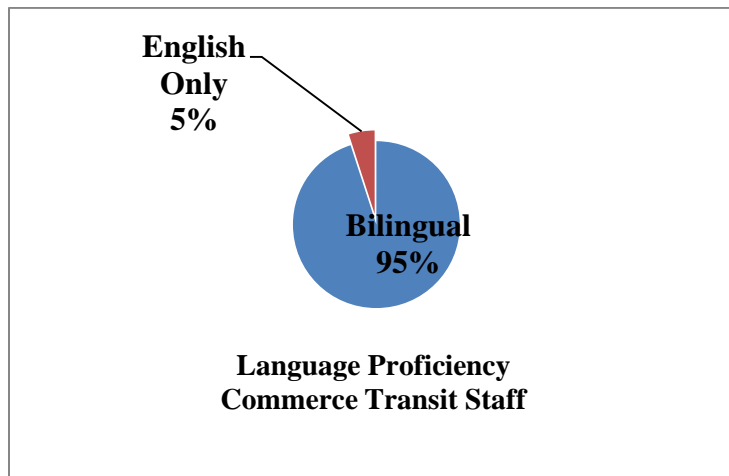
Based on input for LEP persons, the most critical services provided by Commerce are:

- Fixed Route transit service
- Dial-A-Ride Paratransit service

IV. Factor 4: The Resources Available to the Recipient and Costs

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs.

As shown below, 95% of the staff within the Commerce Transportation Department is bilingual. **All LEP customers can be accommodated by existing staff.**



Transit service information, information posted inside transit vehicles, web pages, and bus destination signs are all bilingual. Commerce includes all costs for LEP assistance in the current Transportation Department budget.

Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access

No additional services are currently required to provide meaningful access to LEP persons. The City continually interacts with community groups and will identify any new LEP groups that speak languages other than Spanish and provide additional language assistance as necessary.

Task 4, Step 3: Analyze your budget

Since Commerce already has administrative staff and bus operators that are bilingual, the cost associated with implementing further LEP measures are limited to staff time, printing, marketing, and advertising.

Task 4, Step 4: Consider cost effective practices for providing language services

Commerce collaborates with community organizations identified in Task 1 to implement cost effective practices that provide:

- Distribution channels for printed information
- Educational and outreach opportunities to help improve access for LEP persons.

LANGUAGE ASSISTANCE PLAN

Under the LEP Policy, the Language Assistance Plan is comprised of various implementation procedures and measures to provide meaningfully access translation of written and oral information; and to ensure that no person shall be discriminated against relative to services that CTD furnishes on the basis of race, color, or national origin.

Procedures to Identify an LEP Person in Need of Language Assistance

CTD shall perform a language needs assessment to determine the language demographics of its service area using one or more of the following methods:

- Analyze updated census data to identify the percentage of LEP persons by census tract.
- Utilize ridership surveys from transit planning or marketing studies to identify the percentage of CTD riders that are LEP persons.
- Examine records to see if requests for language assistance have been received in the past and if so, for what language.
- Survey front-line staff such as drivers and customer service staff regarding their experiences concerning any contacts with LEP persons during the previous year.

Research among operations staff, customer service, and administrative staff reveal that the frequency of contact with LEP persons speaking Spanish occurs on a daily basis; contact with Chinese speaking patrons is occasionally. Moreover, CTD's Language Assistance Plan works in conjunction with the Public Participation Plan to engage LEP populations utilizing 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 affected project or services to provide input or comments.

Language Assistance Measures

CTD shall perform a language needs assessment to determine the language demographics of its service area using one or more of the following methods:

- CTD Customer Service shall request the assistance of trained interpreters to provide translation for the LEP identified languages upon request.
- Public meeting announcements posted on the CTD website shall be available in English and LEP identified languages.

When written communication is received from a LEP customer, it is forwarded to the CTD Director who will designate an appropriate staff member to translate and provide a response in the LEP customer's native language. CTD has several authorized bi-lingual employees who are well versed in providing translation services.

Outreach Techniques

If the percentage of LEP persons in a particular census tract is significant or if the ridership surveys reveal a significant percentage of CTD's riders are LEP persons, CTD will identify the primary language(s) of those individuals potentially impacted and implement the following steps:

- Instructional and informational rider materials and passenger notices shall be available in English and in the potentially impacted LEP identified languages within affected communities of the CTD service area.
- All public hearing notices shall be published in an English language newspaper and the LEP identified language newspaper, if available, while following all requirements set forth in the CTD Major Service and Fare Changes Policy.
- All public hearing notices shall contain the following verbiage in English and the LEP identified languages:
 - Comments regarding the proposal may be submitted by phone at (323) 887-4419 or via standard mail to Transportation Department, Director of Transportation, 5555 Jillson Street, Commerce, CA 90040.
- Pictographs shall be used on the buses whenever possible to instruct and depict necessary information and procedures.
- General notices stating that language translation assistance is available for LEP identified languages shall be posted on City of Commerce public meeting agendas.
- Information displays at 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 LEP identified languages, upon request.
- CTD printed information at an event shall be available in English and the LEP identified languages.
- All customer surveys shall be available in English and in the potentially impacted LEP identified languages within specific communities of the CTD service area.
- All Title VI complaint forms shall be available in English and the LEP identified languages.

Staff Training

Training of CTD's responsibility relative to serving LEP persons is provided during orientation and initial training of new operators. Dispatchers, field supervisors, customer service personnel and management staff also receive ongoing training in this regard. Specifically, the following training shall be provided to CTD staff:

- Information regarding CTD's Title VI Program and LEP responsibilities.
- Information regarding the Title VI complaint forms and procedures; and how to handle a potential Title VI/LEP complaint.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- Use of interpretive services.

Monitoring and Updating the LEP Policy and Language Assistance Plan

The CTD LEP Policy and Language Assistance Plan are designed to be flexible to the needs of the public. On an annual basis, CTD staff shall evaluate the LEP Policy and Language Assistance Plan and, if applicable, propose revisions based on input from the following sources:

- Surveys and studies.
- Formal comments from the public.
- Feed back from customers, community members and CTD staff.
- Input and recommendations from local, State and Federal officials.
- Changes in regulations.

All proposed revisions to the LEP Policy and Language Assistance Plan will be presented to the City of Commerce Council and the public for consideration and approval.

CONCLUSION

This document will serve as the *Limited English Proficiency (LEP) Policy and the Language Assistance Plan*. The plan will be available for review on the CTD website, www.ci.commerce.ca.us and at the Transportation Department Facility. If materials are requested in LEP languages, large type, and/or Braille, staff will make a reasonable attempt to accommodate those needs.

Members of the public can also obtain information about the plan by contacting CTD Customer Service by phone at (323) 887-4419; or via U.S. Postal Service: Transportation Department, Director of Transportation, 5555 Jillson Street Avenue, Commerce, CA 90040.

APPENDIX E

System Map and Line Schedules