



**TORRANCE TRANSIT SYSTEM
TITLE VI STANDARDS AND POLICIES**

October 17, 2016

BACKGROUND

Federal Title VI requirements of the Civil Rights Act of 1964 were recently updated by the Federal Transit Administration (FTA) and now require each public transportation provider's to adopt five standards and policies:

- Major Service Change Policy;
- Disparate Impact Policy;
- Disproportionate Burden Policy;
- System-wide Service Standards; and
- System-wide Service Policies

Torrance Transit staff has developed draft standards and policies and included them within this document for review and adoption by the Torrance City Council.

The first policy defines "major service change" as a threshold for when an agency will conduct a thorough analysis of the potential effects of service changes on protected populations. For the second and third policies, agencies are required to define thresholds for when they will find that a fare change or major service change will result in a "disparate impact" on the minority population or a "disproportionate burden" on the low-income population. The last two policies define service standards and policies to be used when determining whether service and amenities are distributed equitably to minority and non-minority routes and facilities.

Information about the Title VI process, complaint procedures, and the proposed standards and policies are available via the Torrance Transit website as well by calling the customer service phone number.

These policies are in draft form and will be revised based on input from the public and the Board. They will be brought back as final recommendations for approval by the Torrance City Council at a later time.

MAJOR SERVICE CHANGE POLICY

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the Torrance City Council for consideration and included in the Torrance Transit Title VI Program with a record of action taken by the City Council.

A major service change is defined as:

- A. All changes to the existing level of service (whether an increase or decrease) on any of TTS's existing eleven routes, of greater than 25 percent of revenue vehicle hours or revenue vehicle miles shall necessitate the solicitation of public comment.
- B. Experimental service changes of no more than 180 days will not require public comment.
- C. Emergency service changes of no more than 180 days will not require public comment.

Major Service changes and fare changes are subject to Equity Analysis as well, as stipulated by the Federal Transit Administration's enforcement of Title VI of the Civil Rights Act of 1964. Impacts of the proposed changes are analyzed to specifically ensure that they do not disproportionately impact the minority or low income population utilizing the service. The analysis accomplishes the following goals:

- 1. Defines and evaluates the impact on rider.
- 2. Identifies adverse impacts to low-income and minority riders as defined by the FTA's enforcement of Title VI.
- 3. Considers alternatives or mitigating solutions to proposed service changes if there are adverse impacts.

DISPARATE IMPACT POLICY

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations. Per FTA Circular 4702.1 B:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race,

color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

The policy shall establish a threshold for determining when adverse effects of [fare/]service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by nonminority populations. The disparate impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.

In the course of performing a Title VI Equity Analysis, Torrance Transit must analyze how the proposed action would impact minority as compared to non-minority populations. In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, Torrance Transit must evaluate whether there is an alternative that has a more equitable impact. Otherwise, Torrance Transit must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established at 15 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations. The table below provides the existing minority population by route, based on the US American Community Survey 2009-2013 by Census Block Group.

Route	Population (within 1/4 mi)	Minority
Line 1	43,967	84.3%
Line 2	61,207	78.7%
Line 3	85,392	79.7%
Line 4	52,370	75.7%

Line 5	48,033	73.1%
Line 6	18,171	76.6%
Line 7	38,141	65.7%
Line 8	43,281	52.6%
Line 9	32,109	72.2%
Line 10	37,373	75.3%
R3 Rapid 3	66,509	83.3%

DISPROPORTIONATE BURDEN POLICY

This policy establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1 B:

The policy shall establish a threshold for determining when adverse effects of [fare/]service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations ... The disproportionate burden threshold must be applied uniformly ... and cannot be altered until the next [Title VI] program submission.... At the conclusion of the analysis, if the transit provider finds that low-income populations will bear a disproportionate burden of the proposed fare[service] change, the transit provider should take steps to avoid, minimize, or mitigate impacts where practicable. The transit provider should describe alternatives available to low-income populations affected by the fare[service] changes.

The Torrance Transit's Disproportionate Burden Threshold to determine if the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established at 15 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations. The table below provides the existing low-income population by

route, based on the US American Community Survey 2009-2013 by Census Block Group. The low income status is defined as 150% of the Census-defined poverty rate provided published by the U.S. Department of Health and Human Services in the Federal Register on January 25, 2016.

Route	Population (within 1/4 mi)	Low Income
Line 1	43,967	28.8%
Line 2	61,207	26.4%
Line 3	85,392	32.7%
Line 4	52,370	37.9%
Line 5	48,033	18.2%
Line 6	18,171	17.0%
Line 7	38,141	15.4%
Line 8	43,281	15.3%
Line 9	32,109	22.8%
Line 10	37,373	21.2%
R3 Rapid 3	66,509	35.7%

SYSTEMWIDE SERVICE STANDARDS

Pursuant to requirements set forth in The Federal Transit Administration's (FTA) Circular 4702.1 B Torrance Transit must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service. In some cases, these standards differ from standards used by Torrance Transit for other purposes.

The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers set these standards; therefore, these standards will

apply to each individual agency rather than across the entire transit industry:

- Vehicle Load;
- Vehicle Headways;
- On-Time Performance; and
- Service Availability

For the purposes of defining service standards and policies for Torrance Transit fixed-route service, the agency has split its system into three route categories:

Local: Moves passengers on arterial streets with stop spacing on average of 0.25 mile between major transfer points, employment centers, shopping areas, and other points of interest.

Rapid: A limited stop service on arterial streets with minimum stop spacing on average of 0.8 mile.

Express: Serves passengers during peak hours and Saturday in and out of downtown Los Angeles via HOT ExpressLane with limited stops.

Category	Line Number
Local	1, 2, 3, 5, 6, 7, 8, 9, 10
Rapid	Rapid 3
Express	4

The categories were not developed to, and in fact do not, differentiate routes by minority or income status of the areas or passengers served. Torrance Transit also defines service standards differently for peak and off-peak service. "Off-Peak" refers to weekday midday and evening service, as well as Saturday, Sunday, and Holiday service. Peak travel times are defined between 6 a.m. and 9 a.m. and 3 p.m. and 7 p.m.

1. Vehicle Load Factor

Vehicle Load Factor is described as follows by FTA Circular 4702.1 B:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed-route transit service (i.e., bus, express bus, bus rapid

transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.

Torrance Transit calculates Vehicle Load Factor by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route. Vehicle Load Factor is monitored regularly to ensure customer comfort and to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns. Vehicle Load Factor standards are presented in the table below.

Category	Peak	Off-peak
Local Service	1.3	1.1
Rapid Service	1.3	N/A
Express Service	1.0	1.0

2. Vehicle Headway

Service demand, scheduling, constraints, fiscal constraints, and time's capital resources are considerations to setting Torrance Transit's vehicle headways. Vehicle headway is described as follows by FTA Circular 4702.1 B:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., four buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15-minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For

example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.

Torrance Transit calculates headway by determining the average length of time between buses on each route during peak and off-peak times. In the event a route regularly exceeds Vehicle Load Factor standards, Torrance Transit will evaluate whether frequency on that route should be adjusted within the confines of existing or expected funding levels. Vehicle headway standards are presented in the table below.

Category	Peak	Off-peak
Local Service	30 - 70 min	30 - 80 min
Rapid Service	11 - 35 min	N/A
Express Service	20 - 40 min	60 - 65 min

3. On Time Performance

Torrance Transit has a system-wide on-time performance goal of 90%. On-time performance is described as follows by FTA Circular 4702.1 B:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed line time window."

A bus is determined to be late if it departs the scheduled "time point" five (5) or more minutes later than the published time. Buses are considered early if

they depart from a published time point one (1) minute or more prior to the scheduled departure. It is Torrance Transit' goal to be on-time at least 70 percent of the time. On-time performance is tracked and published on a quarterly basis and is included in the Key Performance Indicator report to the Torrance Transit Director and Managers. Transit Operations staff regularly performs on road monitoring and on-time performance is one of the areas checked. Operators who consistently fail to meet on-time performance standards are counseled and advised as to how to best meet this requirement. Discussions with bus operators are also used to identify vehicle scheduling issues which are corrected through service changes four times annually. On-time performance standards are presented in the table below.

Category	Peak	Non-peak
Local Service	70%	70%
Rapid Service	70%	N/A
Express Service	70%	70%

4. Service Availability

Service availability/transit access is described as follows by FTA Circular 4702.1 B:

Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be in less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.

Torrance Transit's goal is to ensure 75% percent of residents live within walking distance (i.e. - one quarter mile) of a bus stop. Torrance Transit

service is particularly strong in communities with significant minority and low-income populations. Transit access is determined by mapping all active bus stops within the system and then calculating the population (based on latest Census data) within one-quarter mile radii of those stops. This information is then compared to the total service area population.

SYSTEMWIDE SERVICE POLICIES

The FTA requires fixed-route transit providers to develop a policy for each of the following service indicators. Transit providers also may opt to set policies for additional indicators. The following system-wide policies differ from service standards in that they are not necessarily based on meeting a quantitative threshold, but rather qualitative evaluation results:

- Vehicle Assignment; and
- Transit Amenities

1. Vehicle Assignment

Torrance Transit operates a fleet of 63 Alternative-Fuel Buses - 53 Compressed Natural Gas (CNG) 40-foot coaches and 10 Gasoline-Electric Hybrid (GE) 41-foot buses. Five diesel-powered buses are maintained as the emergency/contingency fleet, though they rarely see operation presently. All coaches are wheelchair accessible, air-conditioned, including bike racks, and are low-floor design and have a kneeling feature for ADA wheelchair ramp. Additionally, Torrance Transit buses are also equipped with on board Computer Aided Dispatch/Automatic Vehicle Locator (AVL) system, which includes on board camera, passenger counters, and automatic voice annunciators. All vehicles have electronic head signs and validating fareboxes. Vehicle assignment is described as follows by FTA Circular 4702.1 B:

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying

vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.

Torrance Transit's policy with respect to vehicle assignment is service-specific. Torrance Transit currently has three modes of service (e.g. – Local, Rapid and Express). With the exception of the Rapid buses, which are specifically designated for those services, all Fixed Route buses are continuously rotated in service so that all the buses serve all lines on a rotational basis.

All buses have the same level of amenities available to riders. Buses are assigned in such a manner to ensure they are distributed equitably among the communities Torrance Transit serves. Buses are not assigned to a specific community or city within Torrance Transit's area based on vehicle age, size or propulsion system or size.

When new buses are purchased, they are distributed based on the age and mileage of the coaches at the yard. Coaches with the highest mileage or the oldest are selected first for retirement and replaced with a new bus.

2. Distribution of Transit Amenities

Transit amenities is described as follows by FTA Circular 4702.1 B:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This....is not intended to impact funding decisions for transit amenities. Rather, this ... applies after a transit provider has decided to fund an amenity.

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters, benches and trash receptacles. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).

Torrance Transit is responsible for the transit amenities at all bus stops located within the City of Torrance. Other bus stop locations system-wide that

are outside if the City of Torrance are maintained by individual cities in cooperation with Torrance Transit. Additionally, Torrance Transit will also help those cities identify high traffic bus stops by providing ridership information and information regarding the bus routes servicing individual stops.

A. Bus Shelters

Local policy states that shelters are considered for installation based on the following criteria:

- Stops where more than 30 passengers boardings/transfer per day
Local policy also states that all bus shelters within Torrance city limits shall include trash receptacles and that all stops with shelters and benches will be cleaned and have their trash receptacles emptied twice per week.

B. Bus Stop Benches

Benches are considered for installation based on the following criteria:

- Stops where more than 20 passengers boards.

C. Trash Receptacles

Trash receptacles are considered for installation based on the following criteria:

- Required by law for all stops with Torrance city boundaries.

Torrance Transit utilizes a contractor and City staff to empty bus stop trash receptacles within the City of Torrance at least once each week.

Bus Stop Guidelines

The placement of bus stops is usually dependent on multiple factors including density of the area as well as location of the bus stop at the intersection. This section provides a guideline for Torrance Transit when seeking to relocate existing or determine new bus stops.

1. Bus Stop Spacing

The spacing of bus stops is important in ensuring a free-flow level of service, maintaining on-time performance threshold, and providing access to passengers within the area of a bus stop. When bus stops are located too

closely to one another, the walking distance will be reduced. However, the operating speed of the bus significantly increases. Buses will also have to stop and pick up passengers more often and will not reach an optimum speed desired. Closely-spaced bus stops will create an overall longer bus trip time.

The goal of Torrance Transit is ensure that passengers have easily accessible bus stops, while at the same time, our buses can maintain optimal system speeds. The table below provides minimum and maximum spacing to all three modes of service provided by Torrance Transit. These threshold will be used when reviewing bus stop placement on any given line.

Category	Minimum Spacing (Mile)	Maximum Spacing (Mile)
Local Service	0.25	0.5
Rapid Service	0.8	1.25
Express Service	0.5	2.5

Whenever possible, bus stops will be placed at the minimum spacing to allow for reduced travel times throughout the system. When a route travels on freeway or through a low density land use area (e.g. commercial, industrial, etc.), minimum spacing may increase due to the lack of safe location to stop.

2. Bus Stop Placement

Torrance Transit utilizes a possible of three locations at any given intersection for a bus stop: near-side, (immediately before the intersection), mid-block (between two intersections), and far-side (immediately after the intersection). As a guideline, when relocating or installing new bus stops, bus poles should be installed on the far-side of an intersection. Far-side stops are often a preferential option over mid-block or near-side because far-side locations are better in terms of safety and schedule adherence. In the case of our Rapid 3 Line, fare-side stops also compliments to the Bus Signal Priority Program (BSP).

Near-side stops are also acceptable when a school or hospital is located on the same side as it eliminates the vulnerability of the passengers having to cross the street. In this case, near-side stop is often preferred as they provide a safer environment for passengers.

PROCEDURES

In compliance with FTA Circular 4702.1B, Torrance Transit must perform a system-wide monitoring process of its performance relative to its service standards and service policies provide in previous sections not less than every three years. The monitoring process includes comparing minority transit routes to non-minority transit routes to ensure that equal service is being provided system wide.

A minority route is defined as one in which at least one-third of the revenue miles are located in a Census block, Census block group, or traffic analysis zone where the minority population percentage is greater than the minority population percentage found in the service area. The table below describes existing minority routes and non-minority routes within the system.

Route	Minority Line
Line 1	Yes
Line 2	Yes
Line 3	Yes
Line R3	Yes
Line 4	Yes
Line 5	No
Line 6	No
Line 7	No
Line 8	No
Line 9	No
Line 10	No

Additionally, service standards to be analyzed by route and minority vs. non-minority are:

1. Vehicle load
2. Vehicle headway
3. On-time performance
4. Service availability

Service policies to be analyzed system-wide:

1. Vehicle assignment
2. Distribution of transit amenities

METHODOLOGY FOR TITLE VI SERVICE STANDARD AND POLICY

ASSESSMENT

Vehicle Load: Vehicle loads will be analyzed by individual route during peak and off peak times. Peak travel times are defined as 6 a.m. to 9 a.m. and 3 p.m. to 7 p.m. Off-peak times are early morning, midday, late evening, as well as Saturday, Sunday, and holidays. Maximum load factors is defined as the maximum achievable capacity calculated by dividing the actual total seated and standing capacity by the seated capacity of the vehicle. In this analysis, Torrance Transit staff will utilize data from the most recent schedule change. The tables below provide examples that will be included in the results of the analysis. Data may also be presented in graphical format.

Route	Minority Route?	AM Peak		Off-Peak		PM Peak	
		Average Load Factor	Standard Load Factor	Average Load Factor	Standard Load Factor	Average Load Factor	Standard Load Factor

Route	AM Peak		Off-Peak		PM Peak	
	Average Load Factor	Standard Load Factor	Average Load Factor	Standard Load Factor	Average Load Factor	Standard Load Factor
Average Minority Route						
Average Non-Minority Route						

Vehicle Headway: Vehicle headway will be analyzed by individual route during peak and off peak times. Peak travel times are defined as 6 a.m. to 9 a.m. and 3 p.m. to 7 p.m. Off-peak times are early morning, midday, late evening, as well as Saturday, Sunday, and holidays. Maximum load factors is defined as the maximum achievable capacity calculated by dividing the actual total seated and standing capacity by the seated capacity of the vehicle. In this analysis, Torrance Transit staff will utilize data from the most recent schedule change. The tables below provide examples that will be included in the results of the analysis. Data may also be presented in graphical format.

Route	Minority Route?	AM Peak		Off-Peak		PM Peak	
		Actual Headway	Standard Headway	Actual Headway	Standard Headway	Actual Headway	Standard Headway

	AM Peak		Off-Peak		PM Peak	
Route	Actual Headway	Standard Headway	Actual Headway	Standard Headway	Actual Headway	Standard Headway
All Minority Route						
All Non-Minority Route						

On-time Performance: On-time performance will be analyzed by individual route during weekday and weekends for peak and off-peak time period. Torrance Transit shall include comparisons of overall on-time performance of minority lines and non-minority lines. A bus is determined to be late if it departs the scheduled "time point" five (5) or more minutes later than the published time. Buses are considered early if they depart from a published time point one (1) minute or more prior to the scheduled departure. In this analysis, Torrance Transit staff will utilize data from the most recent schedule change. The tables below provide examples that will be included in the results of the analysis. Data may also be presented in graphical format.

Weekday		AM Peak		Off-Peak		PM Peak	
Route	Minority Route?	Actual OTP	Standard OTP	Actual OTP	Standard OTP	Actual OTP	Standard OTP
Average System Wide							

Weekday	AM Peak		Off-Peak		PM Peak	
Route	Actual OTP	Standard OTP	Actual OTP	Standard OTP	Actual OTP	Standard OTP
Average Minority Route						
Average Non-Minority Route						
Average System Wide						

Service Availability: Service availability will be analyzed and measured by

comparing the percentage of minority and non-minority population within ¼ mile of Torrance Transit bus stops. Additionally, the staff will also measure and compare the two groups within a 1 mile radius of all bus stops. These numbers will also be used to compare with the overall service area percentage. Below is an example of a table that will be used to display the results of the analysis. Data may also be presented in a graphical format as well.

Households	Within 1/4 Mile	Within 1 Mile
Minority		
Non-Minority		
System-Wide		

Vehicle Assignment: Torrance Transit operates a fleet of 63 Alternative-Fuel Buses - 53 Compressed Natural Gas (CNG) 40-foot coaches and 10 Gasoline-Electric Hybrid (GE) 41-foot buses. Five diesel-powered buses are maintained as the emergency/contingency fleet, though they rarely see operation presently. Torrance Transit's policy with respect to vehicle assignment is service-specific. Torrance Transit currently has three modes of service (e.g. – Local, Rapid and Express). With the exception of the Rapid buses, which are specifically designated for those services, all Fixed Route buses are continuously rotated in service so that all the buses serve all lines on a rotational basis.

Using the table below as an example, Torrance staff will compare minority and non-minority routes being served by the types of buses, average age of the buses, and their purchase dates. Data may also be presented in a graphical format as well.

Type of Buses	No. of Minority Routes Served	Avg. Age of Buses	Avg. Date of Purchase
Compressed Natural Gas (CNG)			
Gasoline-Electric Hybrid			
Diesel-Powered			

Distribution of Transit Amenities: As mentioned in our “Service Policies” section, Torrance Transit is responsible for the transit amenities at all bus stops located within the City of Torrance. Other bus stop locations system-wide that are outside of the City of Torrance are maintained by individual cities in cooperation with Torrance Transit. Additionally, Torrance Transit will also

help those cities identify high traffic bus stops by providing ridership information and information regarding the bus routes servicing individual stops.

Torrance Transit staff will provide a map of our system wide transit amenities including, transit centers, bus shelters, benches, trash receptacles, etc. relative to the location of the bus routes overlaying the locations of minority and non-minority populations. Additionally, a separate map will be provided showing just the transit amenities located in the City of Torrance overlaying the locations of minority and non-minority populations within the city. Data may also be presented in table format in addition to transit amenities overlay maps.

SERVICE AND FARE EQUITY ANALYSIS

A Title VI Equity Analysis completed for a major service change or proposed fare change must be presented to the Torrance City Council for consideration and included in the Torrance Transit Title VI Program with a record of action taken by the City Council. Additionally, Torrance Transit has developed threshold for disparate impact and disproportionate burden per FTA Circular C 4702.1B. These thresholds are intended to ensure that major service changes or fare changes do not unfairly burden minority and low-income populations within our service area.

In order to meet with the requirements of the Circular, Torrance Transit must evaluate each service change and determine if it exceeds the major service change threshold. Should that threshold is exceeded, or when a fare change is proposed, Torrance Transit must provide analysis of the service change based on the disparate impact and disproportioned burden policies.

Major Service Change Analysis: As stated and defined in our major Service Change Policy, all major increases or decreases in transit service of greater than 25 percent of revenue vehicle hours or revenue vehicle miles shall subject to a Title VI Equity Analysis prior to Board approval of the service change and shall necessitate the solicitation of public comment.

The minority population of the entire service area is 78.3 percent and the low-income population of the entire service area is 32.2 percent. The Data for the minority population was derived from the US American Community Survey, 2009-2013. The table below provides an example of what our agency will be using to perform an analysis for all major service changes. The analysis compares the number of people trips before and after the service change for each individual route and the cumulative impact as a whole with respect to minority and low-income populations. The analysis will also compare the impact borne by minority and low-income groups for the service changes against the

respective service area average.

Route	Before				After				Difference				
	Popula tion (within 1/4 mi)	Low Inco me	Mino rity	Trips (Annu ally)	Popula tion (within 1/4 mi)	Low Inco me	Mino rity	Trips (Annu ally)	People- Trips (Popula tion * Trips)	Low Inco me Peop le- Trips	Mino rity Peop le- Trips	Chan ge Borne By Low Inco me	Chan ge Borne by Minori ties
1 Line 1													
2 Line 2													
3 Line 3													
4 Line 4													
5 Line 5													
6 Line 6													
7 Line 7													
8 Line 8													
9 Line 9													
10 Line 10													
R3 Rapid 3													
All Changes													

	Low Income	Minority
Change Borne By		
Area Average		
Delta		

Fare Equity Analysis: According to our Fare Change Policy, all fare changes are subject to Equity Analysis as stipulated by the Federal Transit Administration’s enforcement of Title VI of the Civil Rights Act of 1964. Impacts of the proposed changes are analyzed to specifically ensure that they do not disproportionately impact the minority or low income population utilizing the fare media.

As part of the Fare Equity Analysis, Torrance Transit staff will provide graphical information regarding fare payment by ridership groups (minority, low-income and overall ridership). Additionally, the staff will also provide a table similar to the one shown below to identify a pattern in fare media usage by groups, the percent change of the fare media proposed, and how that proposed fare media change will affect minority and low-income groups compared with the overall usage based on our disparate impact and disproportionate burden threshold policies.

Percent of Total	Cost		Change		Usage by Group		
	Existing	Proposed	Absolute	Percentage	Minority	Low-Income	Overall
Local Base Fare							
L.A. Express Base Fare							
Senior Local Fare							
Senior L.A. Express Fare							
Children Base Fare							
Students Local Fare							
Students L.A. Express Fare							
Disable Local Fare							
Disable L.A. Express Fare							
Blind Base Fare							
Medicare Local Fare							

Medicare L.A. Express Fare							
Interagency Transfer							
Regular Local Pass							
Regular L.A. Express Pass							
Student Local Pass							
Student L.A. Express Zone Fare							
Local EZ Pass							
L.A. Express EZ Pass							
Senior Local EZ Pass							
Senior L.A. Express EZ Pass							

City of Torrance Transit System

Guidelines for Public Review and Participation: *Fare and Service Changes*
Updated: 5/26/2016

The Torrance Transit System's policy on Required Public Comment conforms to the requirements of the Federal Transit Administration, state and local transit authorities, and the City of Torrance Procedure. The purpose of this policy is to ensure the opportunity for public participation prior to making significant changes in fares or service, which impact riders on the Torrance Transit System

- I. Fare Changes Requiring Public Review
 - A. All changes to the existing fare structure (whether an increase or decrease) by the Torrance Transit System (TTS) shall require the solicitation of public comment.

- II. Service Changes Requiring Public Review
 - A. All changes to the existing level of service (whether an increase or decrease) on any of TTS's existing eleven routes of greater than 25 percent of revenue vehicle hours or revenue vehicle miles shall necessitate the solicitation of public comment.
 - B. Any proposed new route or routing coverage change for an existing route shall be deemed a major service change and require public comment.
 - C. Experimental service changes of no more than 180 days will not require public comment.
 - D. Emergency service changes of no more than 180 days will not require public comment.

- III. Procedures for Conduct of Public Review
 - A. A public hearing is mandatory for any fare change or for any service change, greater than 25 percent as described in the previous sections. Any new proposed routes or service coverage changes shall also require public hearing. The public hearing may be held in conjunction with a meeting of the Torrance City Council or at separate meetings organized by staff.
 - B. Publish legal notice describing proposed change in service or fares prior to the hearing date.
 - C. Notice will appear in the South Bay Daily Breeze and specific neighborhood ethnic newspapers (La Opinion) servicing areas affected by change.

- D. Notification of intent to change fares or change levels of service and information on public hearing will be posted on TTS (where appropriate) transit vehicles and at the West Annex Transit Center.
- E. Notice will be posted at the TTS web site (where appropriate) as well as all social media outlets (Facebook and Twitter).
- F. Public comment will be accepted at public hearing and by written submission, telephone voice mail or message, fax, and e-mail.
- G. Consideration will be given to all public submissions and comments.

Summary of Public Review and Participation

On November 10, 2012, High Occupancy Vehicle (HOV) lanes on the I-110 Freeway in Los Angeles County were converted to High Occupancy Toll (HOT) lanes (known as ExpressLanes). Per State law, net toll revenues must be reinvested in the same corridor where they were generated on transit and/or carpool lane improvements. In 2014, LACMTA approved the Transit Department's application for a \$2,235,991 ExpressLanes Net Toll Revenue Reinvestment Grant to improve service that fed service or served the I-110 ExpressLanes.

Transit Staff identified Line 4 as a primary candidate to receive these funds for service improvements. Currently Line 4 operates nine one-way trips per weekday. In the morning, four trips start in Torrance at Hawthorne Boulevard at Pacific Coast Highway and pick up passengers on Hawthorne Boulevard and Torrance Boulevard, on Vermont Avenue and at Harbor Gateway Transit Center (HGTC) before taking the ExpressLanes to Downtown Los Angeles with the final stop at Union Station. In the afternoon, five trips start in Downtown Los Angeles picking up passengers to take them back to Torrance and other South Bay destinations.

In the summer of 2015, Transit staff conducted an on-board passenger survey on all nine Line 4 trips to determine their travel patterns, reasons for riding the bus, and preferences for potential future service improvements. Through this process, Staff created a proposal that would truncate Line 4 at the Harbor Gateway Transit Center to feed the Metro Silver Line during weekday off-peak hours and weekends, and where by Line 4 during the peak periods would be replaced by Line 4X. Line 4 and Line 4X were proposed to operate every 45 minutes and speed improvements to southbound service would be realized with service being re-aligned from Figueroa St to Flower St for Line 4X.

On November 17, 2015, the Transit Department presented a proposal based on the findings of the survey along with additional research to the Transportation Committee. The Transportation Committee gave their approval for the Transit Department to seek Council approval to conduct a series of public hearings to gather input from customers and stakeholders on the proposed changes. The threshold of a major change is defined as anytime a route is to have a decrease or increase of more than 25% in vehicle revenue hours or vehicle revenue miles, or when any fare change is proposed. Line 4 is proposed to exceed the 25% threshold in vehicle revenue and

miles and therefore requires public hearing. Transit staff conducted three (3) public hearings regarding the proposed Line 4 and Line 4X service changes. The three meetings conducted by Transit staff were:

- January 26, 2016 at 11am – 1pm at Katy Geissert Civic Center Library (Torrance)
- January 26, 2016 at 6pm – 8pm at Katy Geissert Civic Center Library (Torrance)
- January 27, 2016 at 6pm – 8pm at Los Angeles Trade Tech College (Los Angeles)

The venues for these public hearings were selected to comply with Title VI and allow opportunities for customers and stakeholders along the current Line 4 route to have an opportunity to attend. In conjunction with the three meetings, Transit staff conducted the following outreach activities to promote awareness and inform the public of the service changes, to solicit feedback.

- January-March 2016, information on proposed service changes was posted on the Transit website home page. The information included locations and times of the public hearing sessions.
- Printed information appeared in English and Spanish and was distributed by the following means:
 - Car cards were posted overhead the passenger seating area inside all buses
 - Take-one flyers were distributed at the following locations:
 - In all buses
 - At all public hearing meetings
 - At the West Annex Transit Store
 - Katy Geissert Civic Center Library
 - El Retiro Branch Library
 - Henderson Branch Library
 - North Torrance Branch Library
 - Southeast Branch Library
 - Walteria Branch Library
- Social media updates were posted on Facebook and Twitter regarding the meetings with links to information on our website
- E-mail and telephone hotlines were created to collect public feedback from any member of the public not able to attend the meetings
 - All patrons seeking additional information received follow-up communications from staff
- Advertisements for the public hearings were published in two newspapers, the Daily Breeze and La Opinion, two weeks prior to the meetings and alternative methods of contacting the department with comments
- A press release regarding the proposed service changes and public outreach process was sent to all Torrance CitiCABLE news media contacts

During the public input process, a total of 17 participants attended the public hearings held by Transit.

The attendance for each meeting was as follows:

- January 26, 2016 at 11am – 4 attendees
- January 26, 2016 at 6pm – 9 attendees
- January 27, 2016 at 6pm – 4 attendees

At each meeting, transit staff described proposed changes to routing, service frequency, and service span. Time was dedicated after the presentation to hear and address questions and concerns raised by the public and to provide clarification as requested. Comment cards were completed by attendees to assure that all feedback was recorded and considered and to give an opportunity for comment to those who did not want to speak before a large group. All comment cards received during this process were included in the planning process (Appendix D, Public Hearing Comment Cards). In addition to public hearings, patrons were able to contact staff directly via mail, e-mail, and a hotline. All feedback received at the meetings and through telephone and electronic media were summarized (Appendix E, Hotline and E-mail Summary of Comments). Patrons who sought follow-up responses from staff were contacted directly. Respondents were overwhelmingly in favor of the general concept of making improvements to service. The most common specific comments received during this process were:

- ***Desire for better frequency so that customers would have more options to meet work and personal schedule needs.***
- ***Concern over duplication of Line 1 and proposed Line 4 off-peak trips that would go only as far north as Harbor Gateway Transit Center, not to Downtown Los Angeles***
- ***Concern over fares south of Harbor Gateway Transit Center***
- ***Concern over maintaining last southbound trip around 6:45pm***
- ***Wanting weekend service to Downtown Los Angeles***
- ***Concern over the possibility of empty buses in the midday***
- ***Approval of reverse commute trips, two-way operation***

Revised proposal after feedback

With consideration of public feedback, staff modified the proposal to replace Line 4 entirely with Line 4X to maximize peak frequency, maintain existing service span, and add hourly service on Saturday. Line 4X is proposed to begin in Fall of 2016. The following is a summary of all proposed changes:

- Cancel and replace Line 4 with Line 4X
- Operate bi-directional service on Line 4X every 20-30 minutes during AM and PM peak periods
- Modify routing for southbound service due to Regional Connector construction (Appendix B, Proposed New Line 4 Routing Map)
 - A) Between 5th St and Wilshire Bl, service will no longer operate on Flower

St, but instead use Grand Ave. The stop on Flower St at 5th St will be moved to Grand Ave at 5th St.

- Modify routing for southbound service to improve speed by travelling on Flower St between 11th St and 23rd St instead of Figueroa St (Appendix B, Proposed New line 4 Routing Map)
 - A) Remove stops on Figueroa St at Pico Bl and Washington Bl, and on 23rd St at Flower St
 - B) Add stops on Flower St at Pico Bl, Washington Bl, and 23rd St
- Add additional northbound service stop on 6th St at Flower St
- Add hour service on Saturday

The modified proposal is designed to address the concerns of all stakeholders while also staying within the project budget. By concentrating our service during the peak periods, Staff believes that Line 4X will be able to maximize ridership potential and therefore use the grant funding most effectively while meeting the needs of the public.

The proposed changes for Line 4X have been approved and is scheduled to launch in Fall of 2016.

City of Torrance Limited English Proficiency Plan

Updated May 2016

City of Torrance Limited English Proficiency Plan

Updated May 2016

LIMITED ENGLISH PROFICIENCY [LEP] PLAN

TORRANCE TRANSIT SYSTEM CITY OF TORRANCE, CALIFORNIA Updated May 2016

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Torrance Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance".

Torrance Transit is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services on the basis of race, color, or national origin.

This plan was developed to guide Torrance Transit in its administration and management of Title VI related activities.

Plan Summary

Torrance Transit has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, the Torrance Transit undertook the U.S. Department of Transportation's four-factor LEP analysis which considers the following factors:

5. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Torrance Transit program, activity or service.
6. The frequency with which LEP persons come in contact with Torrance Transit programs, activities or services.
7. The nature and importance of programs, activities or services provided by Torrance Transit to the LEP population.
8. The resources available to Torrance Transit and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Torrance Transit program, activity or service.

Torrance Transit reviewed 2010 U.S Census tract level data. Those census tracts that were within ¼ mile of a Torrance Transit route were considered part of the Torrance Transit service area. The review indicated that the total service area has a population of reportedly 812,241 individuals who are five years of age or older. Of those persons, 192,384 (23.69%) speak English “not well” or “not at all”. Of those persons with limited English proficiency, 136,300 (70.85%) speak Spanish. The next languages listed with the highest number of persons that speak English “not well” or “not at all” were: 1) Korean at 14,430 persons (7.50%); Filipino/Tagalog at 9,923 (5.16%); Chinese at 8,795 (4.57%) and Japanese at 7,308 (3.80%). A number of other language groups (i.e. – Vietnamese, Arabic, Persian, Hindi, etc.) make up the remainder of limited English speaking persons in the service area.

As detailed in Figures 1 through 3, census tracts with the majority of limited English speaking persons were located primarily in the Downtown Los Angeles area and I-110 Fwy. corridor as well as portions of the service area in the communities of Wilmington and Long Beach. These tracts had a population of limited English speaking persons ranging from a low of 20% to a high of 60% or more.

2. The frequency with which LEP persons come in contact with Torrance Transit programs, activities or services.

Torrance Transit reviewed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes reviewing phone inquiries and surveying bus operators. To date, Torrance Transit staff has had infrequent requests for assistance in languages other than English. In an optional survey of bus operators, thirty (30) bus operators indicated a fairly high level of interaction with LEP persons. Most bus operators surveyed indicated that they have daily interaction with LEP persons. Approximately 37% of bus operators surveyed interact with LEP persons 10 or more times a day. The predominate language encountered by bus operators is Spanish, with some interaction with Korean-speaking passengers. There have been few requests made to bus operators for language translation of public information, with 73% of operators indicating that passengers do not request translated materials.

Figure 1: Torrance Transit Service Area Census Tracts and Route Network

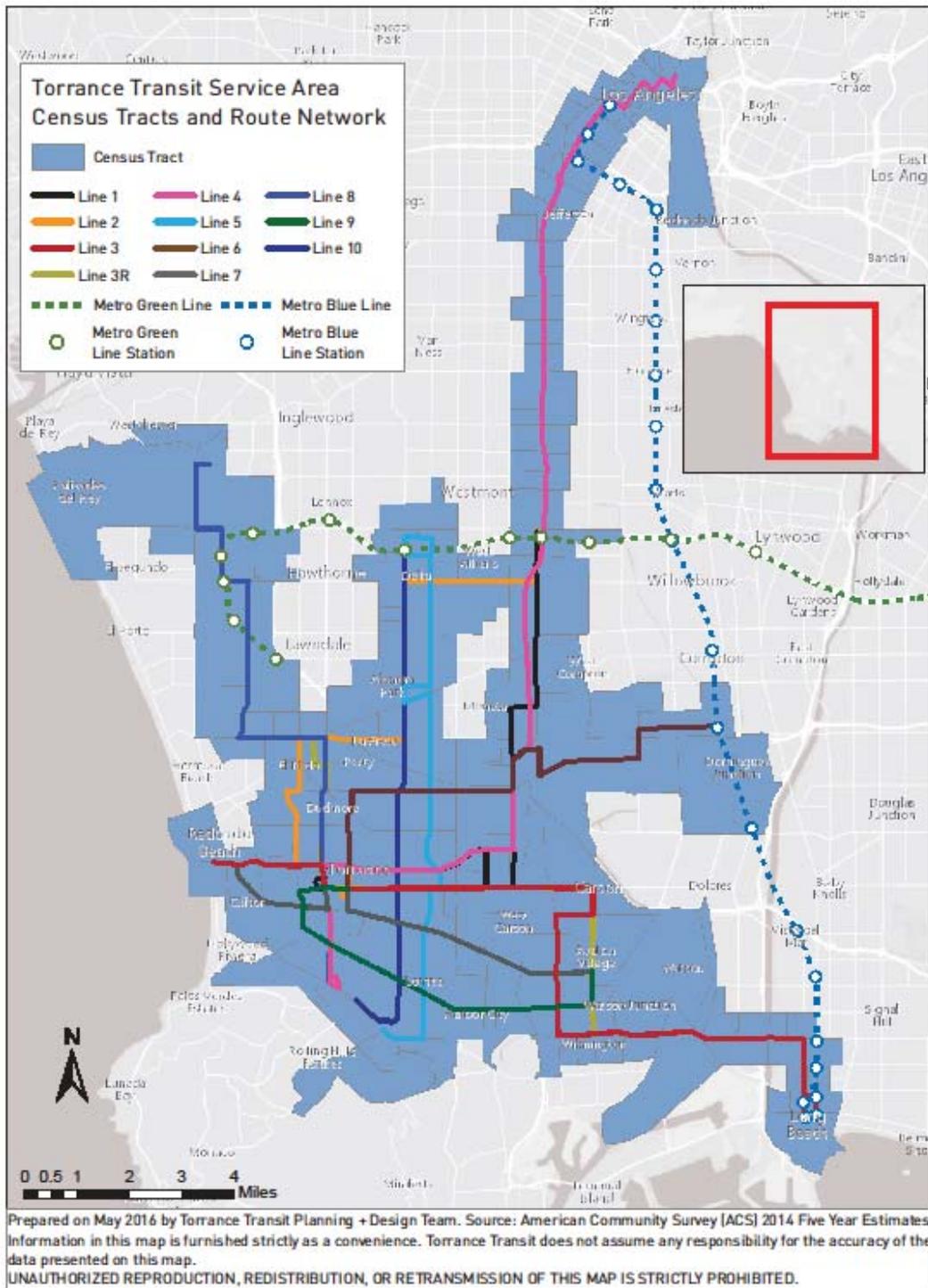


Figure 2: Percentage of English Language Spoken by Census Tract

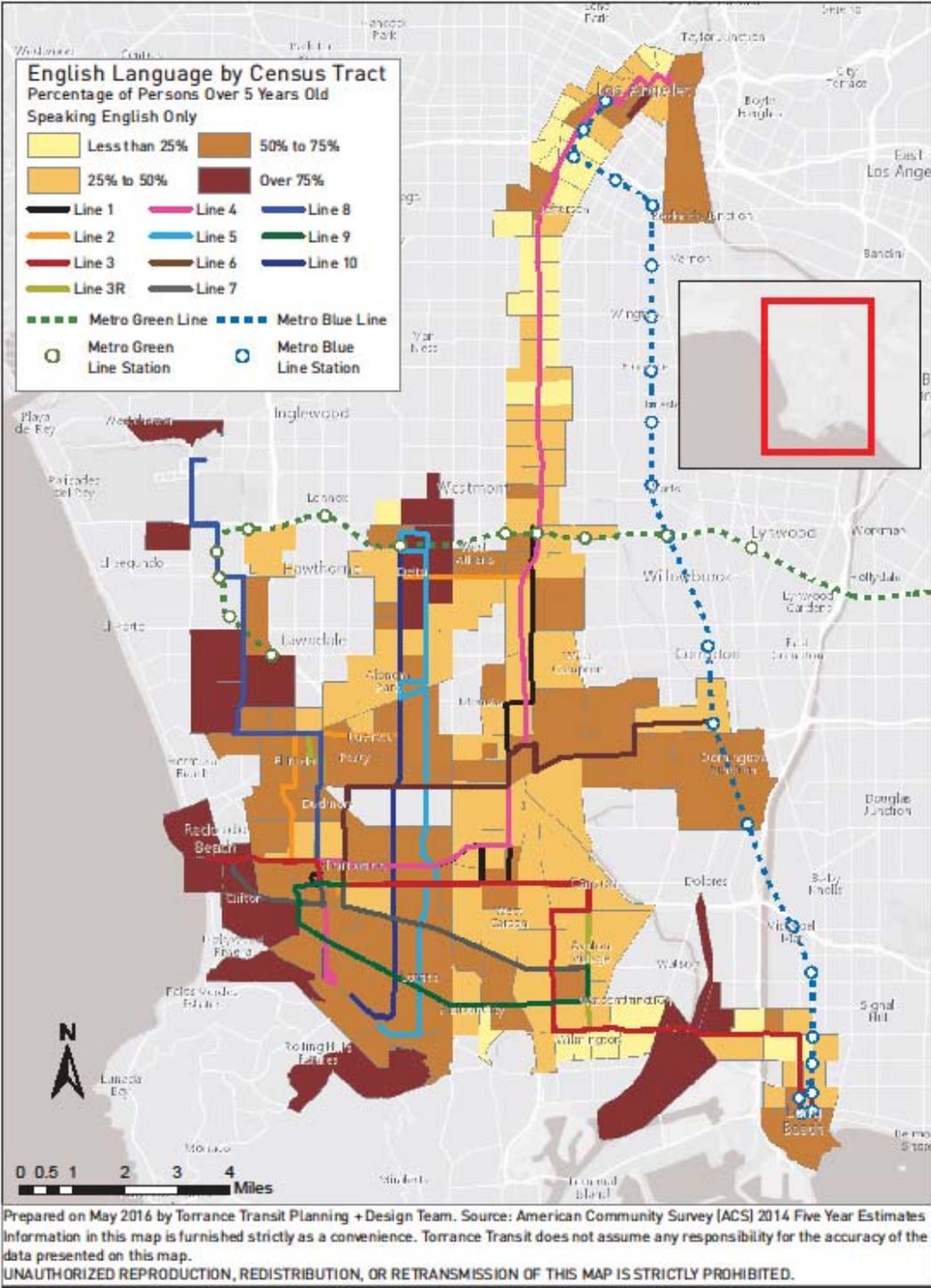
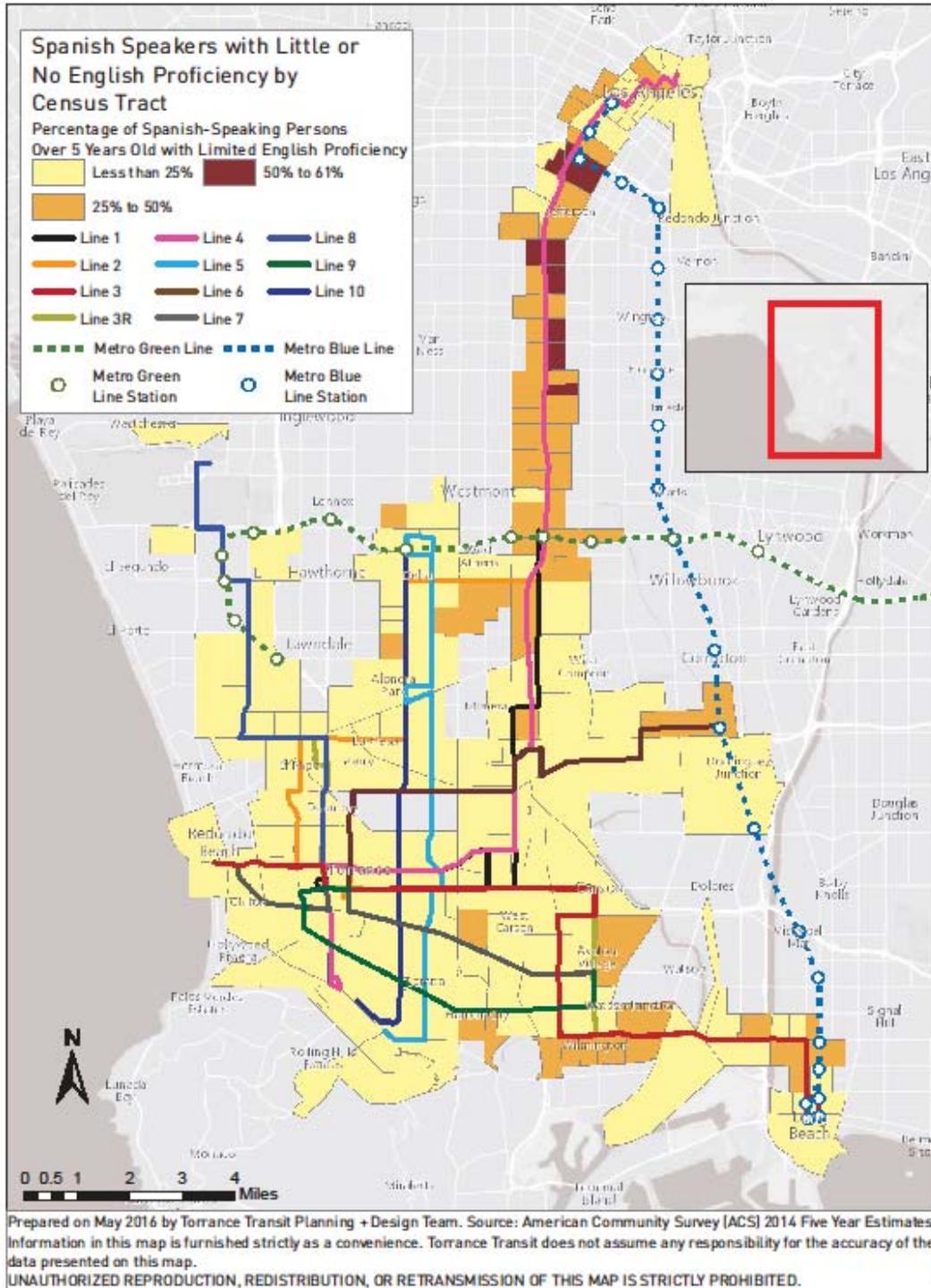


Figure 3: Percentage of Spanish Speakers with Little or No English Proficiency



3. The nature and importance of programs, activities or services provided by Torrance Transit to the LEP population.

As detailed in Figures 1 through 3, census tracts with the majority of limited English speaking persons were located primarily in the Downtown Los Angeles area and I-110 Fwy. corridor as well as portions of the service area in the communities of Wilmington and Long Beach. Because Torrance Transit service to Downtown Los Angeles is express-oriented with few stops, the largest geographic concentration of LEP individuals in the Torrance Transit service area that has access to local bus service is in the Wilmington area. Between 30% - 60% of the Wilmington community is Spanish-speaking with little or no English proficiency. The Wilmington Branch of the Los Angeles Public Library System, located near Torrance Transit Line 3, provides literacy programs to community residents as well as residents of surrounding communities. In speaking with the literacy program director, many program participants use transit, although it is unknown how much they use Torrance Transit compared to other local transit providers (Metro, City of Los Angeles DASH). The director expressed that many individuals in the community look to the library as a source for information, and it was noted that the LEP population is usually reluctant to inquire about services or resources due to their residency status, their lack of fluency of English and illiteracy in Spanish. These factors contribute to their unwillingness to make their needs known regarding transit and other issues.

4. The resources available to Torrance Transit and overall cost to provide LEP assistance.

Torrance Transit reviewed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise, and evaluated resources that could be used for outreach and translation efforts. Based on the four-factor analysis, Torrance Transit developed its LEP Plan as outlined in the following sections.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Torrance Transit's programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer or a message from one language into another language. Torrance Transit will determine when interpretation and/or translation are needed and are reasonable. How the Torrance Transit staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.

- When Torrance Transit sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Have Census Bureau *Language Identification Flashcards* available at Torrance Transit events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- Network with local human service organizations, such as the Wilmington Library, that provide services to LEP individuals and seek opportunities to provide information on transit services.
- Vehicle operators and other front-line staff, including bus operators, supervisors, customer service representatives, clerical staff and dispatchers will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

Language Assistance Measures - Torrance Transit will strive to offer the following measures to LEP individuals, that is, persons who speak English "not well" or "not at all",:

- Torrance Transit's Title VI Policy and Torrance Transit staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
- If a client asks for language assistance and Torrance Transit determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, Torrance Transit will provide the language assistance in the LEP client's preferred language. Torrance Transit has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
- Torrance Transit will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance at one or more of the available resources identified under the section "Formal Interpreters" on Page 9.

Safe Harbor Stipulation

Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translations under certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Torrance Transit's translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Only the Spanish-speaking LEP language group in the Torrance Transit service area constitutes the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided meet the safe harbor standard. Given the small number of LEP language group members speaking other languages, the Torrance Transit budget, and the number of staff, it is deemed that written translations of core documents in languages other than Spanish would be so burdensome as to defeat the legitimate objectives of our programs. It is more appropriate in these cases for Torrance Transit to proceed with oral interpretation options for compliance with LEP regulations.

Staff Training

The following training will be provided to Torrance Transit staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the *Language Identification Flashcards*.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

Information will be distributed to all Torrance Transit staff.

Translation of Documents

- In those cases where the need arises for LEP outreach, Torrance Transit will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, and other transit publications will be made available in an alternative language for the known LEP population.

Formal Interpreters

- When necessary to provide meaningful access for LEP clients, Torrance Transit will provide qualified interpreters, including any bilingual staff of the City of Torrance, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.
- Torrance Transit may require a formal interpreter to certify to the following:
 - The interpreter understood the matter communicated and rendered a competent interpretation.
 - The interpreter will maintain private information. Non-public data will not be disclosed without written authorization from the client.
 - Bilingual City employees, when available, can provide limited assistance to Torrance Transit staff and LEP clients as part of their regular job duties.

Informal Interpreters

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. Torrance Transit staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by Torrance Transit. If possible, Torrance Transit should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter, after Torrance Transit has offered free interpreter services, the informal interpreter may interpret.
- If an LEP client wants to use his or her own informal interpreter, Torrance Transit reserves the right to also have a formal interpreter present.

Monitoring

Monitoring and Updating the LEP Plan - Torrance Transit will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2010 U.S.

Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Torrance Transit service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether transit system's financial resources are sufficient to fund language assistance resources needed
- Determine whether Torrance Transit fully complies with the goals of this LEP Plan
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

Dissemination of the Torrance Transit LEP Plan

- A link to the Torrance Transit LEP Plan and the Title VI Plan will be included on the City of Torrance website, <http://www.torranceca.gov/92.htm>
- Any person or agency with internet access will be able to access and download the plan from the City of Torrance website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which Torrance Transit will provide, if feasible.
- Questions or comments regarding the LEP Plan may be submitted to Torrance Transit, 20500 Madrona Avenue, Torrance, CA 90503, phone (310) 618-6266.

Council Meeting of
June 28, 2016

Honorable Mayor and Members
of the City Council
City Hall
Torrance, California

Members of the Council:

SUBJECT: Transit – Approve the submission of required Civil Rights Program Reports to the Federal Transit Administration.

Expenditure: Not applicable.

RECOMMENDATION:

Recommendation of the Transit Director that City Council approve the submission of the Transit Department's Title VI and Equal Employment Opportunity Program Reports as required by the Federal Transit Administration.

FUNDING:

Not applicable.

BACKGROUND/ANALYSIS:

Transit is required to develop and submit a Title VI Program report and Equal Employment Opportunity Program report to the Department of Transportation/Federal Transit Administration (FTA) every three years as part of the Civil Rights Act of 1964. These programs demonstrate Transit's ongoing efforts to ensure non-discrimination and equality in the operation of our Transit system, delivery of service and our recruitment and hiring practices.

- Title VI Program Report –

Covers the period of January 1, 2013 to December 31, 2015. The report gives an overview of Transit's on-going efforts to ensure equal access to transit services regardless of race, ethnicity, gender or income. Our Limited English Proficiency (LEP) Plan is included in this report.

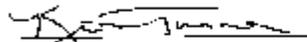
- Equal Employment Program Report –

Covers the period of January 1, 2013 to December 31, 2015. The report analyzes our recruitment and hiring practices during this timeframe and discusses the measures we have taken to eliminate discrimination based on race, color, gender, national origin, religion, age or disability.

Staff completed both the Title VI Program report and EEO Compliance report in late May of 2016 and is submitting them to Your Honorable Body for your review and final approval.

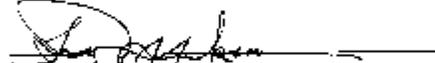
City Council approval of the Title VI Program and Equal Employment Opportunity Program reports is required to ensure compliance with the Department of Transportation, Federal Transit Administration funding requirements, provisions and financial responsibilities. Failure to meet this requirement would jeopardize the Transit Department's requests for federal financial assistance.

Respectfully submitted,



Kim Turner
Transit Director

CONCUR



Terri J. Jackson
City Manager

Attachment: (LIMITED DISTRIBUTION)

- A) Torrance Transit System – Title VI Program Report
- B) Torrance Transit System – Equal Employment Opportunity Program Report