

TORRANCE TRANSIT



Over 79 Years of Dedicated Service to the South Bay Community...

Title VI Program Report CY 2019-2021

**May 2019
City of Torrance, California**



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CHAPTER I: TORRANCE TRANSIT OVERVIEW

A. Purpose

The Federal Transit Administration (FTA) within the U.S. Department of Transportation requires that federally funded transit agencies submit a triennial program to ensure compliance with Title VI of the Civil Rights Act of 1964. Title VI regulations were set forth to assure equal access to transit services regardless of race, ethnicity, gender, or income. To demonstrate compliance with these provisions, Torrance Transit is submitting this program in accordance with FTA Circular 4702.1B.

B. Background of the City

The City of Torrance is 21 square miles, 12,312 acres, and situated halfway between Los Angeles and Orange Counties and bordered by the Pacific Ocean on the west. Incorporated in 1921, the 2017 Census reports that the present population is 147,190, making Torrance the fourth largest city in Los Angeles County and the 12th largest city in California. The median age is presently 41.7 years (notably higher than the Los Angeles County median age of 34.8). The breakdown of the population in terms of race is as follows (as reported by 147,190 residents) in 2017:

Race/Ethnicity	City of Torrance Residents	Percentage
White	72,678	49.4
Black or African American	3,729	2.5
Asian	57,911	35.9
American Indian/Alaska Native	736	0.5
Native Hawaiian/Pacific Islander	749	0.5
Other	7,354	5.0
Two or More Races	9,859	6.7
Hispanic/Latino (any race)	25,657	17.4
TOTAL	147,190	100%

C. Torrance Transit

Torrance Transit has operated weekday service in the City of Torrance continuously since January 23, 1940. As a response to the railroad corporation stopping service between Torrance and Los Angeles, Resolution No. 1374 gave permission to use buses for public transportation. This was supposed to be a temporary solution to the problem, but Torrance Transit continued to grow as the public's need for transportation became apparent.

As of April 30, 2019, Torrance Transit operates a fleet of sixty-three (63), forty-foot (40') buses, including its contingency reserve. The peak vehicle requirements included 48 buses.

Torrance Transit operates eleven fixed-route bus lines. Three of the routes provided service and circulation within the City of Torrance, while the other remaining routes provided regional connections.

Torrance Transit provides important regional connections within the South Bay region of Los Angeles County. Figure 1 provides the peak frequencies by service day for the routes we operate.

Figure 1: Service Days and Operating Frequency by Route				
Route	Description	Peak Frequency (in minutes)		
		Weekday	Saturday	Sunday
1	Del Amo Center Mall (Torrance) to Harbor Freeway Station	40	60	60
2	Del Amo Center Mall (Torrance) to Harbor Freeway Station	60	60	
3	Redondo Beach Pier to Long Beach Transit Gallery	20	25	25
3R	South Bay Galleria (Redondo Beach) to Long Beach Transit Gallery	20		
4X	Hawthorne Blvd at Pacific Coast Hwy (Torrance) to Union Station	30	60	
5	Pacific Coast Highway to Crenshaw Station	60	55	
6	Del Amo Center Mall (Torrance) to Metro Blue Line Artesia Station	45		
7	Redondo Beach Pier to Wilmington via Sepulveda Blvd	60	60	
8	Hawthorne Blvd at Pacific Coast Hwy (Torrance) to LAX Transit Center	25-30	40-60	60
9	Del Amo Center Mall (Torrance) to Lomita Blvd at Avalon Blvd	60	60	
10	Crenshaw Blvd at Pacific Coast Hwy to Crenshaw Station	30	50	

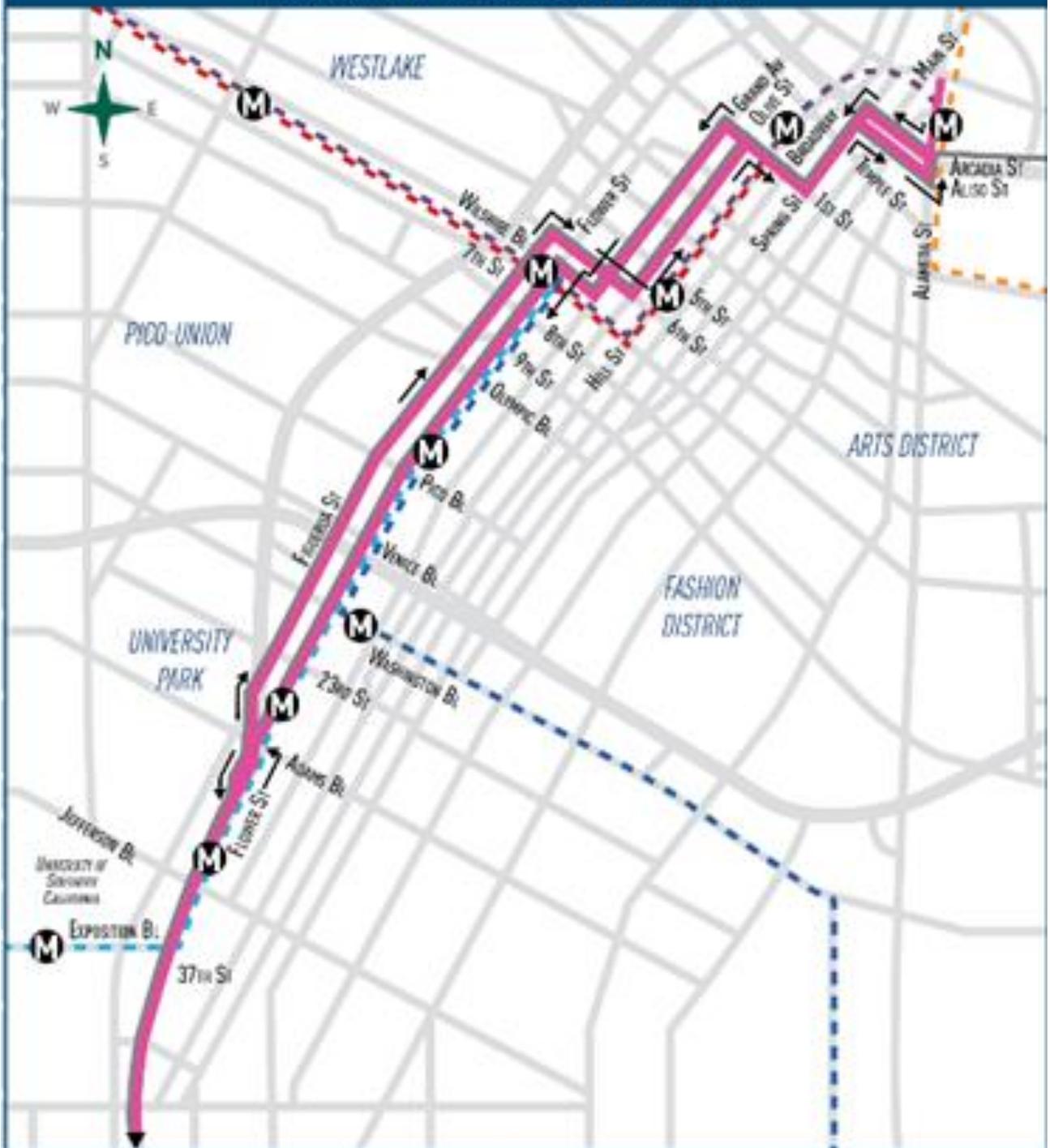
Note: Shaded areas indicate no service on those days.

In addition to bus service, Torrance Transit also provides a demand-response taxi service for elderly and disabled residents 24 hours a day, seven days a week through taxi contractors. Torrance Transit also participates in the Los Angeles County's Access Services, a non-profit agency that provides paratransit services and meets Americans with Disabilities Act (ADA) mandates.

D. System Map



DOWNTOWN LOS ANGELES INSET MAP



CHAPTER II: GENERAL REQUIREMENTS

A. Notice of Rights under Title VI

Torrance Transit System is committed to ensuring that no person is excluded from participation in, or denied the benefits of services on the basis of race, color and national origin as protected by the Civil Rights Act of 1964, as amended.

No person or group of persons will be discriminated against with regards to fares, routing, scheduling or quality of transportation service that Torrance Transit furnishes, on the basis of race, color or national origin.

In addition, the frequency of service, age and quality of Torrance Transit vehicles assigned to routes, and location of routes will not be determined on the basis of race, color, national origin, sex, age or disability.

This information can be accessed via Torrance Transit's website at: <https://transit.torranceca.gov/our-city/transit/rider-information/title-viv>. The information is also posted on all Torrance Transit buses (**ATTACHMENT A** of this document is a copy of the car card of the Title VI Policy posted on buses.)

B. Complaint Procedures

The procedure for filing a formal complaint is outlined on the Transit website which can be accessed at: <https://transit.torranceca.gov/our-city/transit/rider-information/title-viv>. Torrance Transit allows up to one hundred eighty (180) days for an individual or individuals to file a written complaint. ATTACHMENT B of this document is a copy of the Title VI complaint form, and ATTACHMENT B1 is a copy of the department policy and procedure for handling Title VI complaints.

Individuals who feel they have been discriminated against can also contact Torrance Transit via:

Telephone: (310) 618-6266 (Voice)

Facsimile: (310) 618-6229

Email: Transit@TorranceCA.Gov

Receipt of the Title VI Complaint

Complaints may be received via e-mail, mail, phone, walk-in, other department, field supervisor and other Transit staff. The following outlines the process upon receipt of a complaint (a draft of the proposed Title VI complaint form is attached):

1. **Submission of Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, or national

origin has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through Torrance Transit may file a written complaint with the Administration and/or Operations Manager of the Department. Such complaint must be filed within 180 calendar days after the date the person believes the discrimination occurred.

2. **Referral to Review Officer:** Upon receipt of the Complaint, the Transit Administration Manager and/or Operations Manager shall assign one or more staff (most likely a department Analyst, Supervisor or the Senior Business Manager), to evaluate and investigate the complaint. Staff shall complete this investigation in consultation with the City of Torrance City Attorney's Office, and most likely with the involvement of the Risk Manager and Human Resources Division. Transit staff assigned shall complete their review no later than 60 calendar days after the date Torrance Transit received the Title VI Complaint. If more time is required, the Administration Manager and/or Operations Manager shall notify the Complainant of the estimated time-frame for completing the review. Upon completion of the review, staff shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, Transit staff may recommend improvements to Torrance Transit's processes relative to Title VI, as appropriate. Transit staff shall forward their recommendations to the Administration Manager and/or Operations Manager for concurrence. If s/he concurs, s/he shall issue Torrance Transit's written response to the Complainant.
3. **Request for Reconsideration:** If the Complainant disagrees with the response, he or she may request reconsideration by submitting the request, in writing, to the Transit Director within 10 calendar days after its receipt. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Administration Manager and/or Operations Manager. The Transit Director will notify the Complainant of his/her decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Transit Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2, above.
4. **Appeal:** If the request for reconsideration is denied, the Complainant may appeal the Transit Director's response to the Complaint by submitting a written appeal to the Assistant City Manager of the City of Torrance, no later than 10 calendar days after receipt of the Transit Director's written decision rejecting reconsideration.
5. **Submission of Complaint to the Federal Transit Administration:** The complainant may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590.

C. Current Title VI Investigations, Complaints or Lawsuits

During this time frame, two Title VI complaint were received as of April 30, 2019.

D. Public Participation Plan

Torrance Transit makes every effort to engage the community and stakeholders to participate in the development of Transit-related projects and services. Stakeholders such as low-income and minority communities, Limited English Proficiency populations, community based organizations, and businesses are invited to share their views and opinions to ensure that the analysis of all projects and service changes include the needs of those stakeholders impacted. ATTACHMENT C is the department policy and procedure for public comment and participation in service and fare changes.

E. Limited English Proficiency (LEP) Plan

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. Torrance Transit developed a Limited English Proficiency (LEP) Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency 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. The 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:

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.
2. The frequency with which LEP persons come in contact with Torrance Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Torrance Transit to the LEP population.
4. The resources available to Torrance Transit and overall cost to provide LEP assistance.

ATTACHMENT D of this document is Torrance Transit's LEP Plan that was developed in late 2011, adopted in early 2012 and updated in December of 2017 to account for the system changes that had occurred in October of 2017.

F. Racial Breakdown of Non-Elected Advisory Councils

Torrance Transit has a high priority goal of providing customer-driven transit service, and particularly values the views and concerns of the large percentage of minority and low-income populations that utilize our system on a daily basis.

Transit reports directly to two advisory bodies (both seated by publicly elected officials):

- **Torrance Transportation Committee** – Chaired by a Torrance City Council Member (elected) and comprised of two additional City Council Members (elected)
- **Torrance City Council** – Chaired by the Mayor Torrance (elected) and comprised of six City Council Members (elected).

As all of the individuals are elected into office, a racial breakdown of these advisory councils is not required.

G. Subrecipient Monitoring

Torrance Transit is a subrecipient of federal funds, and in turn, does not qualify for subrecipient monitoring.

Title VI Policy

Torrance Transit System 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, national origin, sex age or disability 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 Torrance Transit furnishes, on the basis of race, color, national origin, sex, age or disability. In addition, the frequency of service, age and quality of Torrance Transit vehicles assigned to routes, and location of routes will not be determined on the basis of race, color, national origin, sex, age or disability. Written complaints may be sent to Torrance Transit for review.



For more information: 310-618-6266
<http://Transit.TorranceCA.Gov>



Title VI Complaint Form

(Complaints must be filed within 180 days of the alleged act of discrimination)

Section I				
Name:				
Address:				
Home Telephone:		Work Telephone:		
Email:				
Accessible Format Requirements	Large Print [] Yes [] No	TDD [] Yes [] No	Audio Tape [] Yes [] No	Other [] Yes [] No
Section II				
Are you filing this complaint on your own behalf?			[] Yes* [] No	
* - If you answered "Yes" to the question above, please go to Section III				
If you not, please provide the name and relationship of the person for whom you are filing this complaint.				
Please explain why you are filing for this person.				
Please confirm that you have obtained the permission of the person complaining if you are filing on their behalf: [] Yes [] No				
Section III				
I believe the discrimination I experienced was based on (check all that apply):		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
Date of Alleged Discrimination :				

<p>Please explain what happened and why you believe were discriminated against. Describe all persons who were involved. If you know the name and contact information of the person you believe discriminated against you, please include it here. Also include the name of any witnesses.</p>	

Section IV

Have you previously filed a Title VI complaint with the Torrance Transit System?
 Yes No

Have you filed a complaint with any other Federal, State or local agency, or with any Federal or State Court?	<input type="checkbox"/> Federal Agency	<input type="checkbox"/> State Agency
	<input type="checkbox"/> Federal Court	<input type="checkbox"/> Local Agency
	<input type="checkbox"/> State Court	

Please attach any additional written materials or information that you think is relevant to your complaint.

 Name/Signature

 Date:

Please mail your completed form to:
 Torrance Transit System
 20500 Madrona Avenue
 Torrance, CA 90503
 Attn: Administration Manager

Or you can send your form by:
 Fax: (310) 618-6229
 Email: Transit@TorranceCA.Gov

TORRANCE TRANSIT SYSTEM

DIVISION: Administration and Operations

<p>POLICY: The Administration and Operations Division shall have a policy for handling Title VI Complaints</p>

PROCEDURE:

The Torrance Transit System is committed to ensuring that no person is excluded from participation in, or denied the benefits of services on the basis of race, color and national origin as protected by the Civil Rights Act of 1964, as amended.

No person or group of persons will be discriminated against with regards to fares, routing, scheduling or quality of transportation service that Torrance Transit furnishes, on the basis of race, color or national origin.

In addition, the frequency of service, age and quality of Torrance Transit vehicles assigned to routes, and location of routes will not be determined on the basis of race, color, national origin, sex, age or disability. This information can be accessed via Torrance Transit's website at: <https://transit.torranceca.gov/our-city/transit/rider-information/title-viv>.

The following is the guideline of procedural steps to be followed.

Receipt of the Title VI Complaint – *may be via e-mail, mail, phone, walk-in, other department, field supervisor and other Transit staff. A draft of the proposed Title VI Complaint Form is attached.*

1. **Submission of Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through Torrance Transit may file a written complaint with the Administration and/or Operations Manager of the Department. Such complaint must be filed within 180 calendar days after the date the person believes the discrimination occurred.
2. **Referral to Review Officer:** Upon receipt of the Complaint, the Transit Administration Manager and/or Operations Manager shall assign one or more staff (most likely a Department Analyst, Supervisor or the Senior Business Manager), to evaluate and investigate the Complaint, in consultation with the City of Torrance City Attorney's Office, and most likely with the involvement of the Risk Manager and Personnel Department. Transit staff assigned shall complete their review no later than 60 calendar days after the date Torrance Transit

received the Title VI Complaint. If more time is required, the Administration Manager and/or Operations Manager shall notify the Complainant of the estimated time-frame for completing the review. Upon completion of the review, staff shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, Transit staff may recommend improvements to Torrance Transit's processes relative to Title VI, as appropriate. Transit staff shall forward their recommendations to the Administration Manager and/or Operations Manager for concurrence. If s/he concurs, s/he shall issue Torrance Transit's written response to the Complainant.

3. **Request for Reconsideration:** If the Complainant disagrees with the response, he or she may request reconsideration by submitting the request, in writing, to the Transit Director within 10 calendar days after its receipt. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Administration Manager and/or Operations Manager. The Transit Director will notify the Complainant of his/her decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Transit Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2, above.
4. **Appeal:** If the request for reconsideration is denied, the Complainant may appeal the Transit Director's response to the Complaint by submitting a written appeal to the Assistant City Manager of the City of Torrance, no later than 10 calendar days after receipt of the Transit Director's written decision rejecting reconsideration.
5. **Submission of Complaint to the Federal Transit Administration:** You may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590.

Date: May 31, 2019

City of Torrance Transit System

Guidelines for Public Review and Participation: *Fare and Service Changes*
Updated: 5/31/2019

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 was approved and launched in the Fall of 2017.

ATTACHMENT D

City of Torrance Limited English Proficiency Plan

Updated May 2019

LIMITED ENGLISH PROFICIENCY [LEP] PLAN

TORRANCE TRANSIT SYSTEM CITY OF TORRANCE, CALIFORNIA Updated May 2019

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 2017 (ACS 5-year estimates) 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 784,577 individuals who are five years of age or older. Of those persons, 192,384 (24.51%) speak English “not well” or “not at all”. Of those persons with limited English proficiency, 292,566 (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

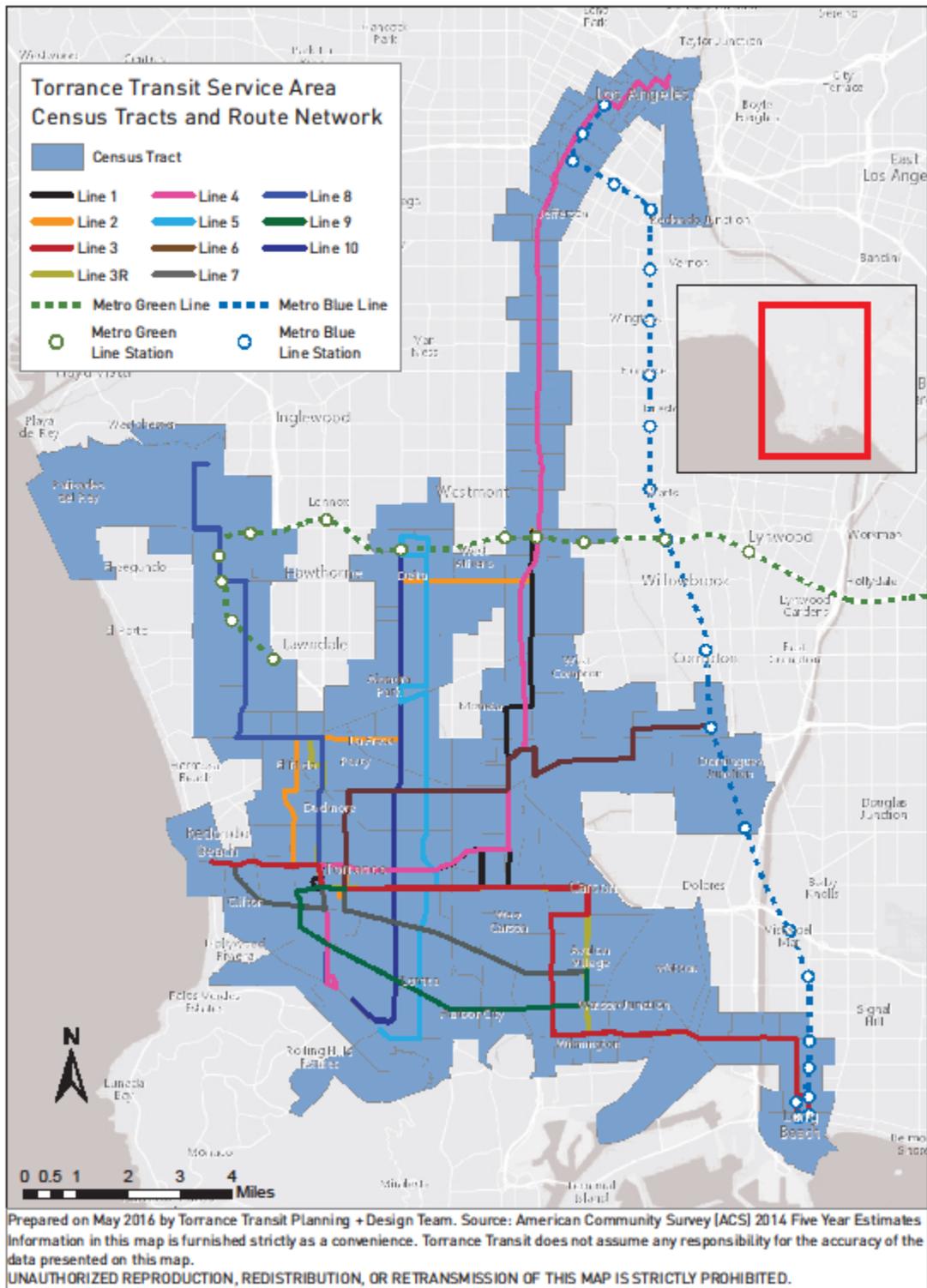


Figure 2: Percentage of Population Speaks English Only

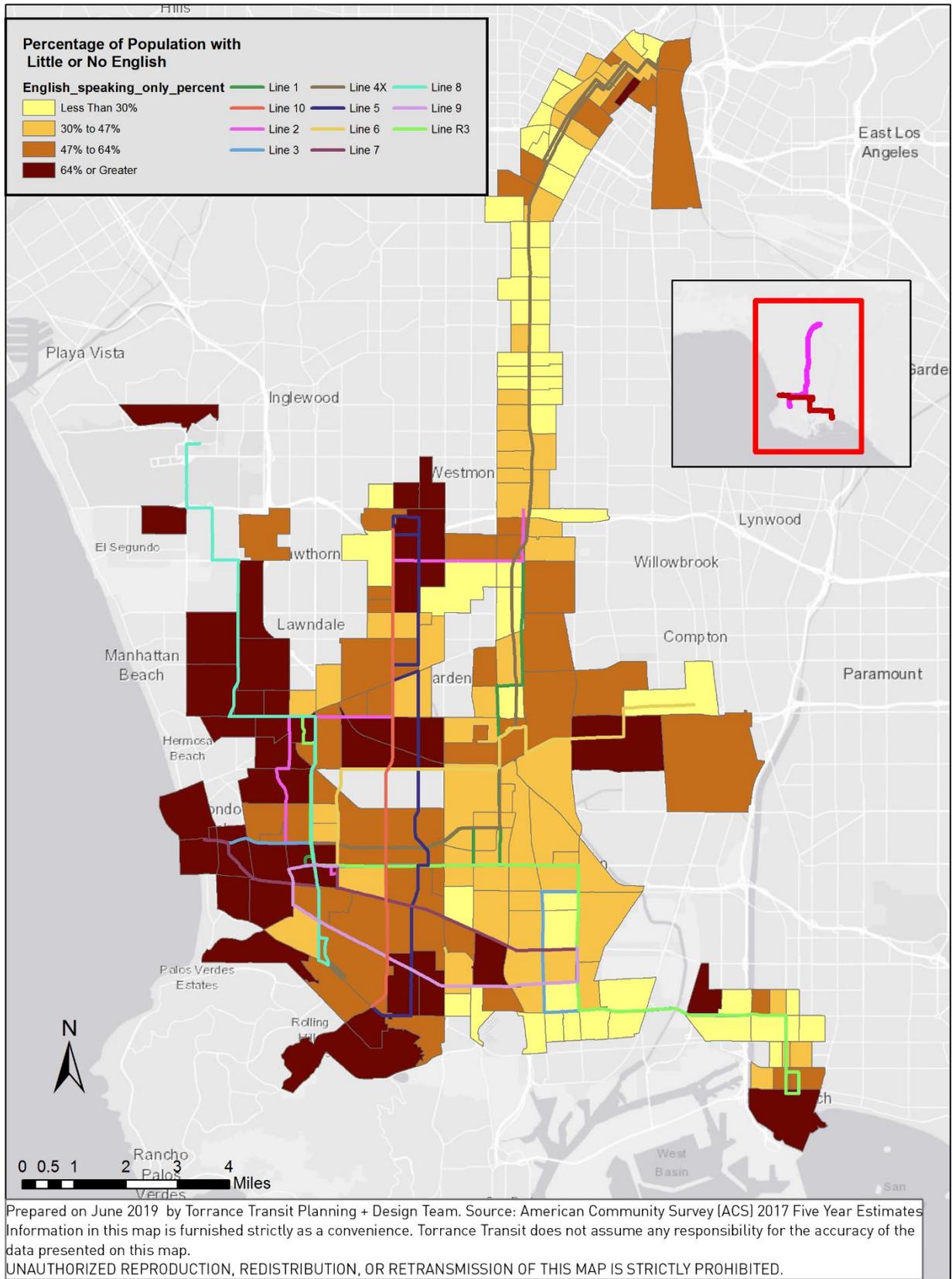
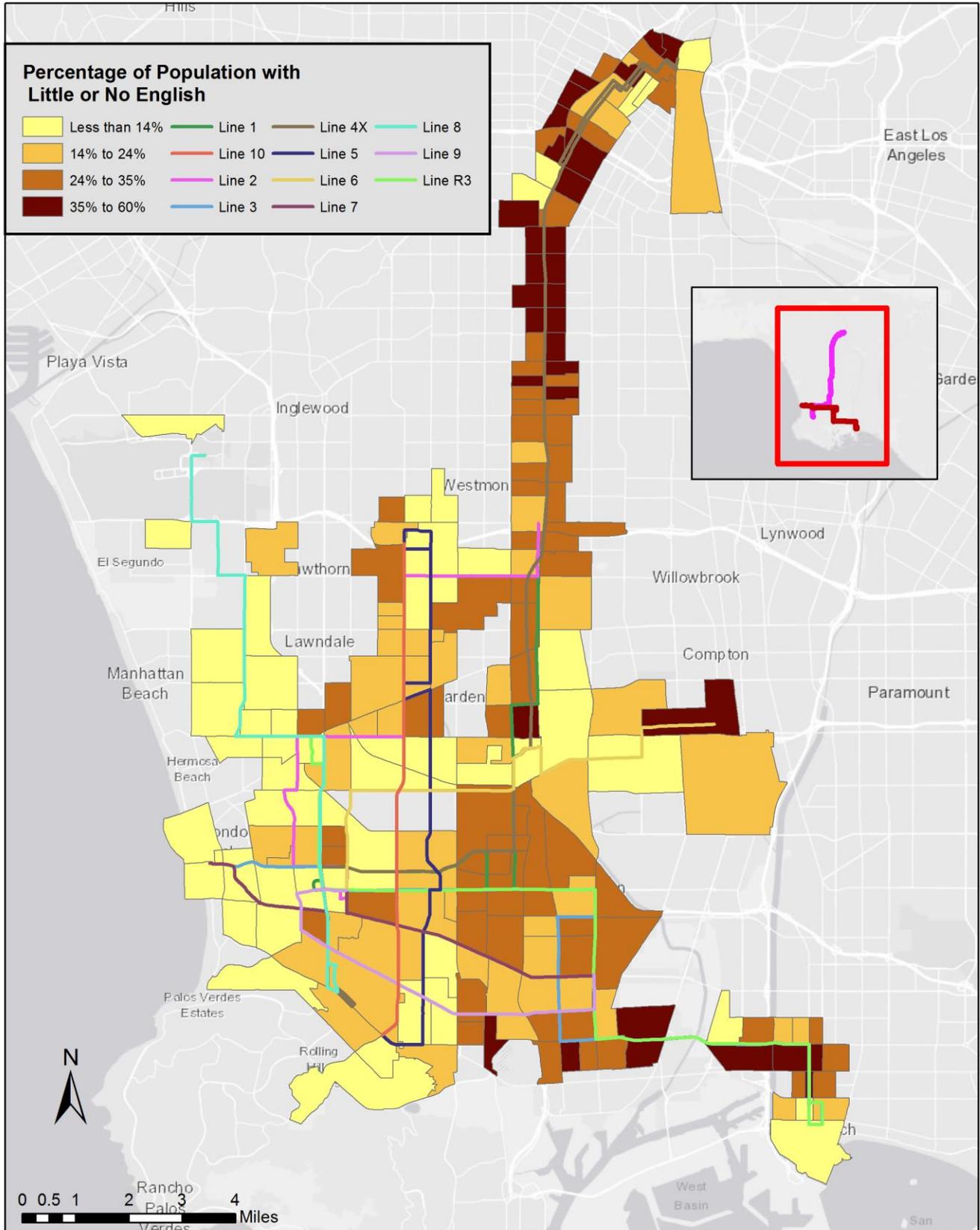


Figure 3: Percentage of Population Speaks with Little or No English Proficiency



Prepared on June 2019 by Torrance Transit Planning + Design Team. Source: American Community Survey (ACS) 2017 Five Year Estimates. Information in this map is furnished strictly as a convenience. Torrance Transit does not assume any responsibility for the accuracy of the data presented on this map. UNAUTHORIZED REPRODUCTION, REDISTRIBUTION, OR RETRANSMISSION OF THIS MAP IS STRICTLY PROHIBITED.

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, <https://transit.torranceca.gov/our-city/transit/rider-information/title-vi>
- 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.