

**City of Gardena**  
**Department of Transportation**  
*GTrans*

***Title VI Report - 2018 Update***



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# TABLE OF CONTENTS

<b>I. OVERVIEW .....</b>	<b>1</b>
A. Purpose.....	1
B. Background of the Service Area.....	1
C. GTrans.....	2
D. City of Gardena 2006 General Plan Circulation Plan .....	3
<b>II. GENERAL REPORTING REQUIREMENTS.....</b>	<b>6</b>
A. Public Notification of GTrans Title VI Protections .....	6
B. GTrans Procedures for Investigating and Tracking Title VI Complaints .....	6
C. List of Active Lawsuits .....	7
D. Compliance Review Activities.....	7
E. Signed Assurances.....	7
F. Monitoring of Subrecipients and Contractors .....	
G. Facility Impact Analysis.....	7
H. Information Dissemination.....	8
I. Limited English Proficiency Implementation Plan.....	9
J. Public Participation Plan.....	11
Public Participation Principles.....	11
Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations.....	12
K. Minority Representation on Decision Making Bodies .....	12
<b>III. PROGRAM SPECIFIC REQUIREMENTS.....</b>	<b>13</b>
A. Service Standards and Policies.....	13
Service Standards.....	13
<i>Vehicle Load</i> .....	13
<i>Vehicle Headway</i> .....	13
<i>On-Time Performance</i> .....	13
<i>Service Availability</i> .....	13
Service Policies.....	14
<i>Distribution of Transit Amenities</i> .....	14
<i>Vehicle Assignment</i> .....	14
<b>IV. CONCLUSION.....</b>	<b>16</b>
<b>APPENDICES</b>	
<b>APPENDIX A: GTrans FTA and DOT Title VI Assurances</b>	
<b>APPENDIX B: GTrans Title VI Complaint Investigation Procedures</b>	
<b>APPENDIX C: LEP Assessment and Implementation Plan for GTrans</b>	
<b>APPENDIX D: Gardena City Council Approval of Title VI Program Update</b>	

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## I. OVERVIEW

### A. Purpose

The Federal Transit Administration (FTA), managed by the U.S. Department of Transportation, requires that federally funded transit agencies submit a triennial report 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, the City of Gardena (GTrans) is submitting this report in accordance with FTA Circular 4702.1B.

### B. Background of the Service Area

GTrans serves several local communities that include: The City of Gardena, Torrance, Lomita, West Carson, Compton, and Hawthorne. The City of Gardena is 6 square miles and situated in the South Bay area of metropolitan Los Angeles between Athens to the north, the City of Torrance to the south, Harbor Gateway to the east, Alondra Park and City of Hawthorne to the west. GTrans' total service area encompasses 40 square miles with a population of approximately 498,085 people<sup>1</sup>.

The City of Gardena was incorporated in 1930 and the U.S. Census Bureau estimates the 2015 population at 60,447<sup>2</sup>, while the median age of residents is 38.8<sup>3</sup> years, and the median household income is \$45,012<sup>4</sup>. The City of Gardena represents 0.6% of Los Angeles County's total population<sup>5</sup>. The breakdown of the population in terms of race for the City of Gardena and the communities it serves is as follows:

Table 1: GTrans Service Area Community Ethnicities

City/Ethnicity	White	African Am	Hispanic	Asian	Native Am	Other
Gardena	8.7%	23.5%	39.2%	25.4%	0.2%	3.1%
Torrance	40.3%	2.7%	16.8%	35.4%	0.2%	3.8%
Lomita	41.9%	4.4%	33.9%	15.0%	0.3%	4.5%
Carson	6.7%	22.8%	39.7%	25.9%	0.2%	5.9%
Compton	0.8%	29.9%	67.2%	0.2%	0.2%	2.1%
Hawthorne	9.8%	25.3%	54.9%	6.6%	0.2%	2.7%

\*Source: SCAG 2013, Local Profiles of SCAG Member Jurisdictions

<sup>1</sup> U.S. Census Bureau, American Fact Finder Data Downloads.

[http://factfinder.census.gov/faces/nav/jsf/pages/download\\_center.xhtml](http://factfinder.census.gov/faces/nav/jsf/pages/download_center.xhtml)

<sup>2</sup> U.S. Census Bureau, 2015 Population Estimate Gardena City California.

[https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml)

<sup>3</sup> SCAG, 2015. Profile of the City of Gardena. <https://www.scag.ca.gov/Documents/Gardena.pdf>

<sup>4</sup> Ibid

<sup>5</sup> Ibid

GTrans serves several large local employment centers in Torrance, Gardena, Carson, and Compton while supplying service links to transit service and regional employment hubs through the Los Angeles County Metropolitan Transportation Authority's (Metro) Blue and Green Metro Rail Lines.

### **C. GTrans**

GTrans has operated weekday service continuously since 1940 in response to a stoppage of railroad service between areas of the South Bay and Downtown Los Angeles. GTrans is a city department that operates as an enterprise fund. Because the department is self-supporting, it is not operated with city general funds.

GTrans provides transportation to area residents with fixed bus routes that service many local communities and provide access to Metro Rail and Downtown Los Angeles. Operations also include demand responsive service available to many elderly and handicapped people in the area who rely on this service to carry out their daily activities.

The Department's total fleet is comprised of about 8 diesel buses, 55 hybrid buses, 2 electric buses, and 8 demand response vehicles<sup>6</sup>. GTrans coordinates its service schedules with surrounding transit providers like the MTA, Torrance Transit, and Beach Cities Transit in a joint effort to develop a functional regional transportation plan and provide riders with an easy commute throughout the South Bay areas into downtown Los Angeles, and to a variety of surrounding locations. GTrans operates 44 peak hour buses and provides low cost, easily accessible public transportation for some 12,781 weekday customers<sup>7</sup>. GTrans accrues 13.2 million annual passenger miles, 3.7 million annual unlinked trips, and 1.6 million annual vehicle revenue miles<sup>8</sup>. Table 2 provides the peak frequencies of service by day for all GTrans routes.

#### *Special Transit Service*

As mentioned in the introduction, GTrans also operates demand response service for senior citizens and disabled residents of Gardena, Hawthorne, and the unincorporated areas of Alondra Park and Del Aire. The service operates Monday thru Friday 7:00 a.m. - 5:00 p.m., on Saturday's from 8:00 a.m. - 5:00 p.m., as well as Sunday, and Holiday service between 8:00 a.m. - 2:30 p.m.

Interested residents can apply for the special transit card at the Gardena Senior Citizens Bureau or Hawthorne Memorial Center. Once a resident has received their card and wishes to schedule door-to-door transportation service, they contact the Gardena Special Transit dispatch to make arrangements at least 24 hours in advance.

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<sup>6</sup> GTrans Fixed Assets Inventory – FY15/FY15 Delivery, Updated March 15, 2016; Personal Contact: Joseph Loh, GTrans, 2016

<sup>7</sup> National Transit Database, 2015. GTrans Transit Profile

<sup>8</sup> National Transit Database, 2015. GTrans Transit Profile

Regular one-way trip fare is 75 cents while blind passengers and handicap assistants ride for free. Passengers from the Gardena Senior Citizens Bureau may also ride by displaying their S.S.I tickets, which may be purchased at the Senior Citizens Bureau for 50 cents.

Table 2: Service Days and Operating Frequencies by Route

Route	Description	Peak Frequency (In Minutes)		
		Weekday	Saturday	Sunday
<b>1X</b>	Redondo Beach Green Line Station to *Downtown Los Angeles (Harbor Fwy. Station)	30	45	45
<b>2</b>	PCH and Normandie	15	30	30
<b>**2 (School Tripper)</b>	Harbor Gateway Transit Center – Gardena HS and Vermont/Gardena – Narbonne HS	2 AM Trips/ 6 PM Trips		
<b>3</b>	South Bay Galleria – Compton Blue Line Station	15	30	30
<b>**3 (School Tripper)</b>	Compton Blue Line Station – Bishop Montgomery HS	2 AM Trips/2 PM Trips (bet. Bishop Montgomery HS & Vermont Ave./163 <sup>rd</sup> St.)		
<b>4</b>	Harbor Gateway Transit Center – 147 <sup>th</sup> St./Hawthorne Blvd.	30-45		
<b>5</b>	Aviation Station – Rosa Parks Station	30		

Note: Shaded areas indicate no service on those days

\*Weekdays only

\*\*Only operates when school is in session

## City of Gardena 2006 General Plan Circulation Element

To demonstrate its commitment to equitable transit service regardless of race, ethnicity, or income the City of Gardena reiterated its pledge to improve the city's circulation and subsequent bus service through their latest 2006 General Plan Update Circulation Element. The purpose of the Circulation Element was to plan, design, and improve the transportation infrastructure to meet projected future needs. Any proposed changes to the circulation system promoted the safe and efficient movement of both people and goods through the City. The policies implemented, as part of the plan will further develop and maintain the circulation system and enhance the efficiency of all transportation modes, as well as support proposed land use patterns as part of the plan. The resulting congestion control efforts will directly affect the efficiency and comfort of local transit service. Any reduction in auto congestion also benefits and improves other modes of transportation and impacts bus transit service directly.

As documented in the Circulation Element, the local county transportation commission, the Los Angeles County Metropolitan Transportation Commission (Metro), is responsible for monitoring the compliance of local transportation networks to the state Congestion Management Plan (CMP). The City of Gardena was found to be in conformance with the state CMP as stated in the 2006 General Plan Update.

In addition to the CMP, the City of Gardena's General Plan update also included policies and programs that supported transportation and air quality goals included in the Southern California Association of Governments Regional Transportation Plan (RTP) and the South Coast Air Quality Management Plan.

The Circulation Element also identifies truck routes and multi-modal transportation options that include Class I-III bicycle lanes along with a description of pedestrian access via the sidewalk network. The plan also details the several transit agencies that operate service within the city as well as their service coordination. All of the planning elements mentioned in the Circulation Element will work together to form a more efficient multi-modal transportation network for the city in the coming decades.

The General Plan Goals and Policies that affected public transit, bicycle, pedestrian, and local surface auto congestion are included below:

- C1 Goal 1 - Promote a safe and efficient circulation system that benefits residents and businesses, and integrates with the greater Los Angeles/South Bay transportation system<sup>9</sup>.
  - Policy C1 1.1- To the extent feasible, maintain traffic flows at nonresidential, signalized intersections at LOS D, and maintain LOS E during peak rush hours<sup>10</sup>.
  - Policy CI 1.2- Minimize truck traffic through Gardena and minimize adverse impacts by regulating off-street truck parking, intrusions into neighborhoods, and noise levels<sup>11</sup>.
  - Policy C1 1.3- Cooperate with surrounding cities, regional transportation agencies, and other responsible agencies to provide efficient traffic management along the major roadway corridors traversing Gardena<sup>12</sup>.

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<sup>9</sup> City of Gardena General Plan, 2006. Community Development Element- Circulation Plan.

<sup>10</sup> Ibid

<sup>11</sup> Ibid

<sup>12</sup> Ibid



- C1 Goal 3 - Promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities<sup>13</sup>.
  - Policy CI 3.1- Work with GTrans and MTA to increase the use of public transit, establish or modify routes, and improve connectivity to regional services<sup>14</sup>.
  - Policy CI 3.2- Maintain, to the extent fiscally feasible, and regularly evaluate the efficiency and effectiveness of GTrans and Dial-a-Ride services for City residents<sup>15</sup>.
  - Policy CI 3.3- Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas<sup>16</sup>.
  - Policy CI 3.4 - Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA's regional bicycle system<sup>17</sup>.

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<sup>13</sup> Ibid

<sup>14</sup> Ibid

<sup>15</sup> Ibid

<sup>16</sup> Ibid

<sup>17</sup> City of Gardena General Plan, 2006. Community Development Element- Circulation Plan.

## **II. GENERAL REPORTING REQUIREMENTS**

There were no sub-recipients for this reporting period that received Federal financial assistance from the FTA through GTrans.

### **A. Public Notification of GTrans' Title VI Protections**

Part of GTrans' Title VI responsibilities is to inform the public of its obligations through a public notice that details GTrans' Title VI complaint procedures. The following notice is posted in the GTrans Bus Book, onboard GTrans buses, on the GTrans website [www.ridegtrans.com/contact/title-vi](http://www.ridegtrans.com/contact/title-vi), and in its customer lobby located at 13999 S. Western Avenue in Gardena, CA 90219:

#### ***Title VI Civil Rights***

*The City of Gardena's GTrans 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, nation origin, as protected by Title VI of the Civil Rights Act of 1964, as amended.*

*No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that GTrans furnishes, on the basis of race, color, or national origin. In addition, the frequency of service, age and quality of GTrans vehicles assigned to routes, and location of routes will not be determined on the basis of race, color, national origin, sex, age or disability.*

*If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the alleged discrimination date. The complaint should include the following information:*

- 1) Your name, address, and how to contact you (i.e. telephone number, email address, etc.)*
- 2) How, when, where, and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.*

*The complaints may be filed in writing with GTrans Customer Service at  
Attn: Director of Transportation  
City of Gardena  
Department of Transportation  
13999 S. Western Avenue  
Gardena, CA 90249*

*Additional Information and Complaint forms can be obtained at GTrans' website:  
[www.RideGTrans.com](http://www.RideGTrans.com)*

### **B. GTrans' Procedures for Investigating and Tracking Title VI Complaints**

Please refer to Appendix B for a full copy of GTrans' Title VI complaint investigation procedures.

### **C. List of Active Lawsuits**

There are currently no active lawsuits against GTrans alleging discrimination on the basis of race, color or national origin arising from the service provided<sup>18</sup>.

### **D. Compliance Review Activities**

No local, state or federal agency (other than the FTA during the triennial review process) has conducted a civil rights review on GTrans in the last 3 years<sup>19</sup>.

### **E. Signed Assurances**

The signed FTA and current DOT assurances were submitted online in compliance with both agencies current-reporting requirements<sup>20</sup>.

### **F. Monitoring of Subrecipients and Contractors**

GTrans does not have any subrecipients or contractors.

### **G. Fixed Facility Impact Analysis**

Title VI requires a fixed facility (transit centers, operations facility or yard) impact analysis for construction projects to assess any impacts to minority communities. If this information has been prepared as a result of an environmental impact statement, the application recipient, or sub recipient, should reference the relevant information by documenting page numbers and date of submission to FTA.

A Title VI Equity Analysis should also be conducted during the planning stages to assess where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the placement of facilities. The Title VI equity analysis must compare the equity impacts of various site alternatives, and the analysis must occur before the selection of the preferred site<sup>21</sup>.

Additionally, environmental justice principles as reflected in the DOT Order on Environmental Justice (DOT Order 5610.2(a)), address Environmental Justice in Minority Populations and Low-Income Populations. The order describes the process the Department and its modal administrations (including FTA) use to incorporate environmental justice principles into programs, policies, and activities<sup>22</sup>.

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<sup>18</sup> Personal Contact: Joseph Loh, GTrans, 2016.

<sup>19</sup> Personal Contact: Joseph Loh, GTrans, 2016.

<sup>20</sup> Personal Contact: Joseph Loh, GTrans, 2016.

<sup>21</sup> Federal Transit Administration, Title VI Circular FTA C 4702.1B, 2012.

<sup>22</sup> Federal Transit Administration, Title VI Circular FTA C 4702.1B, 2012.

As a result of FTA requirements, environmental impact analyses for fixed facilities shall include:

- A Title VI Equity Analysis conducted during planning stages to assess if or how the location will impact minority communities and provides alternatives analysis.
- A project history and background for each construction project or service plan within the document.
- A discussion of the potential impacts on minority communities and minority-owned businesses during and after construction.
- A discussion on all potential negative environmental impacts, such as traffic congestion, noise, air or water pollution;
- A list of minority owned businesses and households affected by construction projects;
- A description of other significant impacts on minority communities, such as: increased traffic, reduction in parking availability, etc.; and
- A description of the relocation program and/or other measures adopted by the applicant used to mitigate identified adverse social, economic, or environmental effects of the proposed construction project or service plan all of which should include an environmental justice component.

GTrans did not construct any new fixed facilities since the submission of its 2013 Title VI Program and thus has not performed a fixed facility impact analysis.

## **H. Information Dissemination**

All announcements for public hearings are given wide distribution through the use of updated mailing lists inclusive of community groups and concerned individuals. Hearing notices are routinely published in the *(Daily Breeze)*, *(Gardena Valley News)* and Spanish-language newspapers *(La Opinion/HOY)* which are circulated throughout the greater South Bay area of Los Angeles County. In addition, these notices are posted in GTrans buses and Gardena City Hall. The public can also dial the City's telephone number or access the City's website to get updated information regarding City business affairs.

GTrans also submits a service change proposal to the Los Angeles County Metropolitan Transportation Authority (Metro) for review if the change (1) involves in excess of 25% of the revenue service provided on a bus route; (2) duplicates in excess of 2% of another operator's service; or (3) will be funded with Proposition A or C Local Return funds.

As stated above, when GTrans proposes any major service changes, the system must meet formal notification and public hearing requirements. To briefly summarize the requirements, GTrans must provide formal notification of what changes are proposed to each jurisdiction affected by service changes and allow each respective jurisdiction 90 days to respond. A public hearing must also be held to provide public input and feedback on the proposed service changes.

These and further requirements are contained in:

The Los Angeles County Metropolitan Transportation Authority “Service Notification Policy – Measures and Public Sharing Procedures for Major Service or Fare Changes”

U.S. Department of Transportation, Federal Transit Administration, Circular C 9030.1B Urbanized Area Formula program: Grant Application Chapter 5.5 (O), “Public comment of Fare and Service Changes”

U.S. Department of Transportation, Federal Transit Administration Triennial Review Guidelines “Public Comment on Fare and Service Changes.” Washington, DC, 1997

During this dissemination period, GTrans staff is confident that all the system riders, including minorities, senior citizens and the disabled, will be thoroughly apprised of any proposed service changes and will have opportunities to influence service-planning decisions as they arise.

## **I. Limited English Proficiency Implementation Plan**

As with any public announcements and customer service information GTrans is well informed of the many languages used by its customer base. In July 2007 GTrans created a Limited English Proficiency Assessment and Implementation Plan to ensure “meaningful” access to transit services and programs. This plan was updated in September 2016.

The assessment discovered, according to the 2010 census and 2014 American Community Survey, more residents of Gardena indicated that they spoke English less than “very well” than the statewide average of persons for all languages other than English. The data indicated that this was particularly the case for Spanish, Asian and Pacific Island languages.

As a result, GTrans implemented several language assistance measures to aid these limited English proficient individuals. The measures were aimed at those language groups with the largest population percentages in the service area that included Spanish, Korean, Tagalog, and Japanese. The City of Gardena maintains a multi-lingual assistance program out of Gardena City Hall for these residents.

As Spanish-speaking persons are a significantly larger segment of the non-English speaking population in the GTrans service area, to assist its Spanish speaking LEP patrons specifically, GTrans has implemented the following measures:

1. GTrans' new Route and Schedule Guide, which includes schedules and fare information, have been printed in Spanish and English and are distributed to the public on every bus. They are also distributed around the City at recreation centers, senior centers, public libraries, and City Hall.
2. Staff fluent in Spanish is available in the GTrans administrative offices to handle inquiries and complaints from Spanish speaking callers.

GTrans also trains its staff by reviewing the availability of bilingual schedules and bus route information in Spanish with all bus operators in their initial training and in their training refresher updates. Copies of the language assistance measures contained in GTrans' LEP Implementation Plan are distributed to all GTrans employees and new hires.

Part of the LEP Implementation also details notifying LEP persons of all GTrans services that are available. Special notices of route changes, public hearings, and holiday schedules are also posted in GTrans buses in both English and Spanish.

Additionally, to assist other non-English speaking language groups, GTrans has instituted several measures to provide language assistance services to these communities. This includes the following activities:

- All GTrans bus operators receive a training course on customer service and communication with LEP persons. Each bus operator must complete this course and provide their signature to certify completion and understanding of the information provided.
- To serve as an aid to the LEP population, GTrans has issued "I Speak" cards to bus operators which allow passengers to point at and identify their spoken language in order to have language assistance services provided.
- The City of Gardena has developed a listing of all city employees that speak languages other than English. This listing can be used to identify city staff that could be called upon to assist in providing language assistance services to LEP persons.
- The new GTrans website now has the "Google Translate" feature that provides users the ability to navigate the website in their primary language.

Information regarding the multi-lingual assistance program, operated out of City Hall, is distributed to community associations in the City of Gardena that expressly cater to those of Latino, Japanese, Philippine and Korean descent.

Part of the plan commits to an annual monitoring regime in order to assure that it is up to date and improved upon as needed. A copy of the entire LEP Assessment and Implementation Plan is available in Appendix C.

## **J. Public Participation Plan**

GTrans recognizes the importance of involving the public in the planning and implementation of transit services. The goals of GTrans' public involvement plan are to ensure that:

- Residents are given the opportunity to participate in the transportation planning process
- The issues and concerns of residents are given consideration in the selection of transportation investments
- Transportation investments do not disproportionately burden any population with adverse impacts

### **Public Participation Principles**

The following principles will be used to develop the Public Involvement Plan for GTrans projects and programs:

- GTrans will determine what non-English languages and other barriers may exist to public participation within the service area
- GTrans will provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area
- Public meetings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public
- Public meetings and hearings will be broadly advertised in the community in non-English languages identified in the updated LEP Plan (Appendix C) through printed materials onboard buses (e.g., interior cards, flyers, and/or comment cards) describing the proposed changes as well as at major transit stops, local print media, and local community centers such as the Nakaoka Community Center
- GTrans will provide notification regarding the availability of language assistance at public meeting as described in the LEP Plan

Over the past three years, GTrans staff held community meetings/public hearings in conjunction with its service modifications on Line 1X, and modification to its fare for blind customers.

### **Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations**

When planning for public engagement, GTrans will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum, GTrans staff will implement strategies such as holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, advertising meetings and hearings in the primary languages spoken in the service area as identified in the updated LEP Plan, and providing notice of the availability of language assistance.

### **K. Minority Representation on Decision Making Bodies**

GTrans does not select membership to any transit-related, non-elected planning boards, advisory councils or committees, or similar bodies. However, GTrans has a high priority goal of providing customer-driven community service, and particularly values the views and concerns of the large percentage of minority groups that utilize our system on a daily basis. The following City commissions and boards, as well as the general public, are encouraged to provide input and/or feedback on service change recommendations:

Planning and Environmental Quality Commission  
 Human Services Commission  
 Recreation and Parks Commission  
 Senior Citizens Commission  
 Gardena Youth Commission  
 City of Gardena Public Improvement Corporation

The percentage of minority representation serving on the various City commissions are indicated in Table 3.

Table 3: Minority Representation on City Commissions in the City of Gardena

<b>Group/Ethnicity</b>	<b>White</b>	<b>African Am</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Native Am</b>	<b>Other</b>
City Council	20%	20%	20%	20%	20%	0%
Planning & Environmental Quality Commission	60%	40%	0%	0%	0%	0%
Human Services Commission (1 vacancy)	20%	40%	0%	20%	0%	0%
Recreation and Parks Commission	60%	40%	0%	0%	0%	0%



Senior Citizens Commission (1 vacancy)	40%	20%	20%	0%	0%	0%
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Gardena Youth Commission – not functioning at this time (no members)

City of Gardena Public Improvement Corporation – official dissolution in 2012

### **III. PROGRAM SPECIFIC REQUIREMENTS**

GTrans operated 44 peak hour fixed route buses during the reporting period and as a result is mandated by FTA Circular (FTA C 4702.1B) to only detail the system-wide service standards and policies as part of section III of the report.

#### **A. Service Standards and Policies**

GTrans has adopted quantitative system-wide service standards for its fixed route services. These standards, which are summarized below, were developed and implemented to help GTrans better achieve equity for all its transit customers in service design and operations decisions. There have been no changes to GTrans service standards during the past three years.

#### **Service Standards**

##### *Vehicle Load*

Vehicle load is the ratio of passengers on the vehicle to the number of seats on the bus. GTrans measures the vehicle load at the maximum load point on each route during peak and off-peak periods. GTrans policy is not to exceed a passenger load to seat ratio of 1.25 for fixed-route services operating in local service, and 1.00 for fixed-route service operating express service on freeway segments<sup>23</sup>.

##### *Vehicle Headway*

Vehicle headway is the measurement of time between buses on a line. GTrans generally operates fixed-route service with vehicle headways between 15-30 minutes during weekday peak periods, and between 30-60 minutes during weekday off-peak periods and weekends<sup>24</sup>.

##### *On-Time Performance*

GTrans defines on-time performance for fixed route bus trips as those trips that depart from a time point location no earlier than the time listed on printed schedules, or arrive at the time point no later than 5 minutes from the scheduled time. GTrans established an on-time performance tracking system in July 2013 for monthly monitoring of performance.

##### *Service Availability*

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<sup>23</sup> Personal Contact: Adrianna Renteria, GTrans, 2016.

<sup>24</sup> Ibid

Service availability generally corresponds to the provision of transit service on major traffic corridors in the service area and access to high population centers and trip generators in urbanized areas. GTrans provides fixed-route service primarily to people who reside within one-half to one-quarter mile of the stops along the routes. Due to the large and varied number of municipal operators that include Torrance Transit, Beach Cities Transit, and the Los Angeles County Metropolitan Transportation Authority (Metro), who also provides services at or near many GTrans stops, patrons have many options to access public transportation and GTrans. The many operators in the region also coordinate regularly to reduce unnecessary duplication of routes and increase a more even distribution of transit services.

GTrans' general standard for the distribution of local bus stops is that bus stops will be established on a bus route at a spacing of no greater than 0.25 miles apart, unless impacted by geography or street infrastructure. If the geography or street infrastructure on a bus route impacts bus stop spacing, bus stops will be placed as close to the 0.25 mile standard as possible.

## **Service Policies**

GTrans has adopted quantitative system-wide service policies for its fixed-route services. These policies, which are summarized below, were developed and implemented to help GTrans better achieve equity for all its transit customers in service design and operations decisions. Since the last Title VI update in 2013, GTrans has included the "reasonable accommodation" standards of the Americans With Disabilities Act (ADA) to their written agency service policies<sup>25</sup>.

### *Distribution of Transit Amenities*

Transit amenities such as bus benches are provided as a convenience to passengers. They are to be placed with a 20-inch clearance to the roadside edge of the curb<sup>26</sup>. GTrans offers more than 400 bus stops throughout its service area. Benches are placed at high traffic bus stops within the City of Gardena where there are heavier boarding levels, major landmarks, and major transfer points. At bus stops outside the City of Gardena, the local jurisdictions determine the placement of transit amenities.

### *Vehicle Assignment*

GTrans' 40-foot buses come equipped with innovative design functions and state of the art propulsion systems that run on clean burning hybrid gasoline-electric and zero-emission technology. GTrans distributes its transit vehicles in an equitable manner using vehicle age as the primary factor. Barring restrictions of certain vehicle fleets (i.e. inability for certain buses to travel on the freeway, or zero-emission battery buses not able to travel on longer routes), vehicles are distributed across the routes equitably by age.

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<sup>25</sup> Personal Contact: Adrianna Renteria, GTrans, 2016.

<sup>26</sup> Personal Contact: Adrianna Renteria, GTrans, 2016.

Table 4: Fleet Characteristics<sup>27</sup>

<b>GTrans Fleet Inventory as of July 2016</b>					
<b>Year Built</b>	<b>Manufacturer</b>	<b>Seats</b>	<b>Length</b>	<b>Total Vehicles</b>	<b>Demand Response Vehicles</b>
1995	TMC	45	40'	1	0
1997	Nova	45	40'	3	0
1997	TMC	45	40'	4	0
2003	Ford E-450	14	24'	2	2
2005	New Flyer	38	40'	17	0
2005*	New Flyer	38	40'	1	0
2009	New Flyer	38	40'	17	0
2010	New Flyer	38	40'	21	0
2011	Ford E-450	12	24'	2	2
2012	Dodge Dept. 40 Grand Caravan	7	17'	4	4
2015	BYD	42	40'	1	0
<b>Totals</b>				<b>73</b>	<b>8</b>

\*One 2005 model bus was remanufactured to a zero emission bus by Complete Coach Works (CCW)

<sup>27</sup> GTrans Fixed Assets Inventory – FY15/FY15 Delivery, Updated July 2016; Personal Contact: Joseph Loh, GTrans, 2016.

#### **IV. CONCLUSION**

This report fulfills the compliance reporting requirements for Title VI as detailed in FTA Circular 4702.1B. The report detailed GTrans' services, long-range planning efforts, and general reporting requirements mentioned in the circular. The program specific requirements were addressed with a demographic and service profile along with a description of GTrans' service standards and policies. The results demonstrate GTrans services a diverse population and supplies public transportation equitably to all classified races, ethnicities, and income levels.

**APPENDIX A:**

**GTRANS FTA AND DOT TITLE VI ASSURANCES**

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## **FEDERAL TRANSIT ADMINISTRATION CIVIL RIGHTS ASSURANCE**

GTrans HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit related benefits.
2. GTrans will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular C 4702.1B and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. GTrans will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

---

Edward Medrano, City Manager  
City of Gardena

---

Date

## DEPARTMENT OF TRANSPORTATION TITLE VI ASSURANCE

GTrans (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21 Nondiscrimination in Federally-Assisted programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations. More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Grants Program:

1. That the Recipient agrees that each "program" and each "facility" as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all Federal Grants and, in adapted from in all proposals for negotiated agreements: GTrans, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, office of the Secretary, part 21, Nondiscrimination in Federally-Assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.
3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to this Act and the Regulations.
4. That the Recipient shall insert the clauses of appendix B of this assurance, as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.



7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements enter into by the Recipient with other parties (a) for the subsequent transfer of real property acquired or improved under the Federal Grants Program; and (b) for the construction or use of or access to space on, over, under real property acquired, or improved under Federal Grants Program.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom she/he delegates specific authority to give reasonable guaranty that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all the requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

---

Edward Medrano, City Manager  
City of Gardena

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Date

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**APPENDIX B:**

**GTRANS TITLE VI COMPLAINT  
INVESTIGATION PROCEDURES**

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## **TITLE VI COMPLAINT PROCEDURES FOR GTRANS**

A person wishing to file a complaint alleging disparate treatment or the disparate provision of transit services on the basis of race, color, national origin, or income level by GTrans may file a complaint in the following manner:

Customers may file a signed, written Title VI Policy Complaint form within one hundred and eighty (180) days of the alleged discrimination date. The complaint should include the following information:

Contact information (name, address, phone number)

How, when, where and why discrimination occurred

Complaint should include the location, names and contact information of any witnesses.

Forms should be submitted in person at the address below, or mailed to:

Attn: Director of Transportation

City of Gardena

Department of Transportation

13999 S. Western Avenue

Gardena, CA 90249

Persons may file a signed, written complaint within one hundred and eighty (180) days of the alleged discrimination date. All written complaints will be referred to the Department of Transportation, GTrans, for evaluation and response. Each complainant will receive an individual written response from the department. Department staff will meet with any complainant at their request. GTrans has 90 days to investigate the complaint. If more information is needed to resolve the case, GTrans may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 60 business days, GTrans can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case. A detailed record of all Title VI complaints and the City's response will be kept on file for a minimum of five years.

It is the policy of the City's Department of Transportation to do everything within its power to thoroughly investigate and to reasonably accommodate Title VI complaints. Complaints that cannot be resolved to the complainant's satisfaction will be referred to the City Attorney's office for final resolution.

## **GTRANS' INTERNAL PROCEDURES FOR TITLE VI COMPLAINTS**

GTrans staff will adhere to the following internal procedures when investigating and resolving Title VI complaints:

1. Once a Title VI complaint is received, GTrans staff will contact the complainant to obtain additional details and information that will assist with the investigation. Department staff will meet with any complainant at their request.
2. Staff will attempt to obtain additional internal documentation which may assist in the investigation, including on-board video camera footage, statements from GTrans personnel, etc.
3. GTrans has 90 days to investigate the complaint. If more information is needed to resolve the case, GTrans may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the personnel assigned to investigate the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 60 business days, GTrans can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
4. After the complaint is reviewed and a determination is made, GTrans will send a closure letter or a letter of finding (LOF) to the complainant. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains how the situation will be addressed. If the complainant wishes to appeal the decision, he/she has 90 days after the date of the letter or the LOF to do so.
5. A detailed record of all Title VI complaints and the City's response will be kept on file for a minimum of five years.

# Title VI Complaint Form

GTrans is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the City Manager acting as EEO/ AA \* Employee Relations by calling (310) 217-9507. The completed form must be returned to the City of Gardena, City Manager, 1700 West 162nd Street, Gardena, CA 90247.

<b>Section I:</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Email Address:		
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered "Yes" to this question, go to Section III		
If not, please supply the name and relationship for whom you are complaining:		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No
<b>Section III:</b>		
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 (Month, Day, Year):		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

<b>Section IV:</b>		
Have you previously filed a Title VI complaint with this agency?	Yes	No
<b>Section V:</b>		
Have you filed this complaint with any other Federal, State, or Local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____		
<input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		
<b>Section VI:</b>		
Name of Agency complaint is against: _____		
Contact Person: _____		
Title: _____		
Telephone Number: _____		

You may attach written materials or other information that you think is relevant to your complaint. Signature and date required below

Signature \_\_\_\_\_

Date \_\_\_\_\_

Please submit this form in person at the address below, or mail this form to:

Attn: Director of Transportation  
 City of Gardena  
 Department of Transportation  
 13999 S. Western Avenue  
 Gardena, CA 90249

GTrans is committed to making its electronic and information technologies accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act (29 U.S.C. § 794d), as amended in 1999. Send feedback or concerns related to the accessibility of this website by using our [Contact Us](#) Form. For more information about Section 508, please visit the website for the State of California's [Department of Rehabilitation](#).



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**APPENDIX C:**

**LEP ASSESEMENT AND IMPLEMENTATION  
PLAN FOR GTRANS**

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# **LIMITED ENGLISH PROFICIENCY [LEP] PLAN**

## **GTRANS CITY OF GARDENA, CALIFORNIA**

### **Introduction**

This Limited English Proficiency (LEP) Plan has been prepared to address GTrans' 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".

GTrans 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 GTrans in its administration and management of Title VI related activities.

### **Plan Summary**

GTrans 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, GTrans 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 GTrans program, activity or service.
2. The frequency with which LEP persons come in contact with GTrans programs, activities or services.
3. The nature and importance of programs, activities or services provided by GTrans to the LEP population.
4. The resources available to GTrans 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 GTrans program, activity or service.**

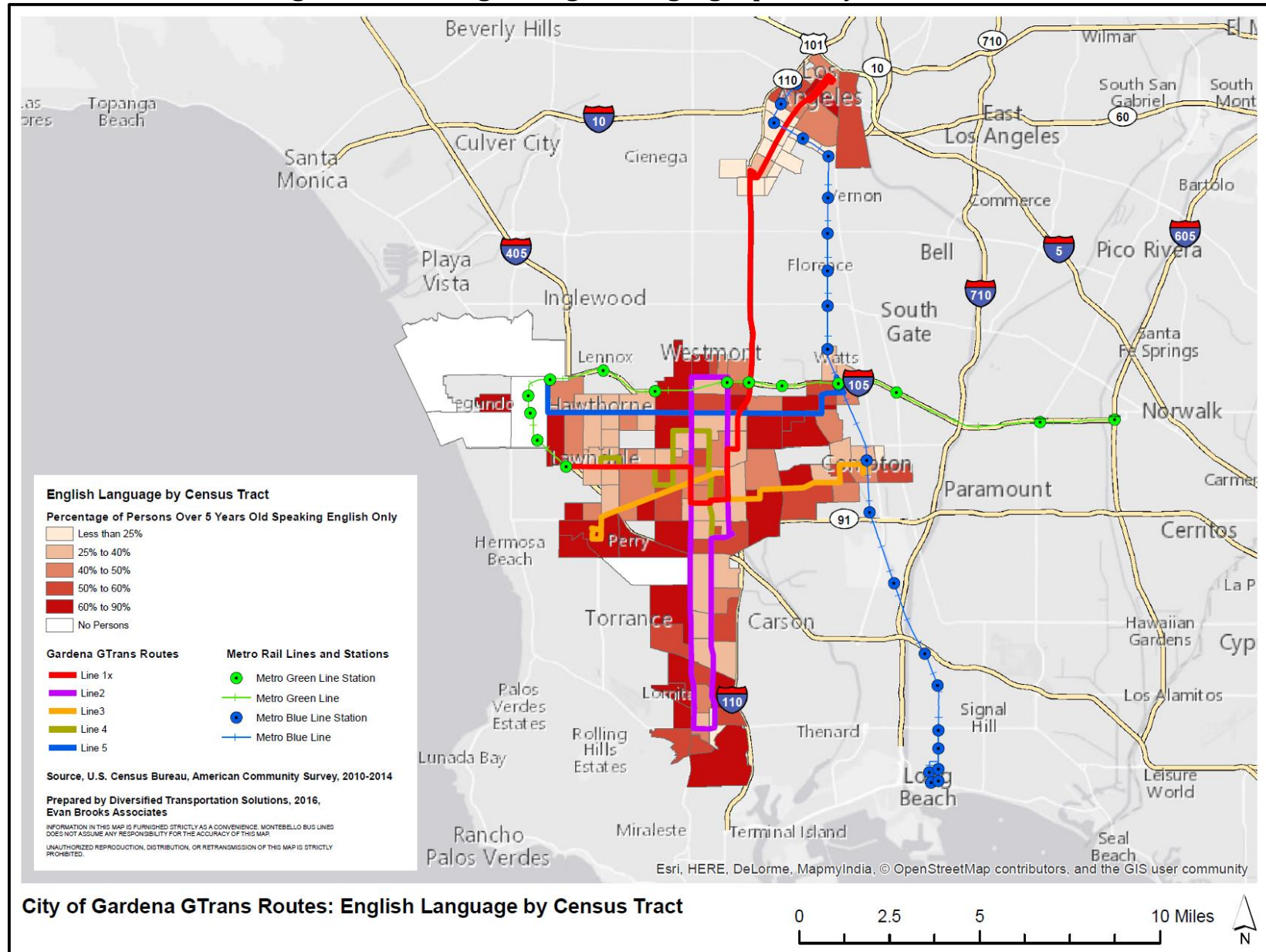
GTrans reviewed 2010 U.S Census tract level data and the 2014 American Community Survey census update data. Those census tracts that were within ¼ mile of a GTrans route were considered part of the GTrans service area. The review indicated that the total service area has a population of 498,085 that are five years of age or older. Of those persons, 129,599 (26.0%) speak English “not well” or “not at all”. Of those persons with limited English proficiency, 95,688 (73.8%) speak Spanish. The next languages listed with the highest number of persons that speak English “not well” or “not at all” is Korean at 6,731 persons (5.2%), Tagalog at 6,048 (4.7%), and Japanese at 4,729 persons (3.6%). A number of other language groups make up the remainder of limited English speaking persons in the service area.

As detailed in Figures 1 through 5, census tracts with the majority of limited English speaking persons were located primarily in the Downtown Los Angeles area and along Western and Normandie Avenues, with a fairly large number of limited English speaking persons of Korean, Tagalog and Japanese decent living in the Redondo Beach Blvd. corridor. These tracts had a population of limited English speaking persons ranging from a low of 2% to a high of 50% or more.

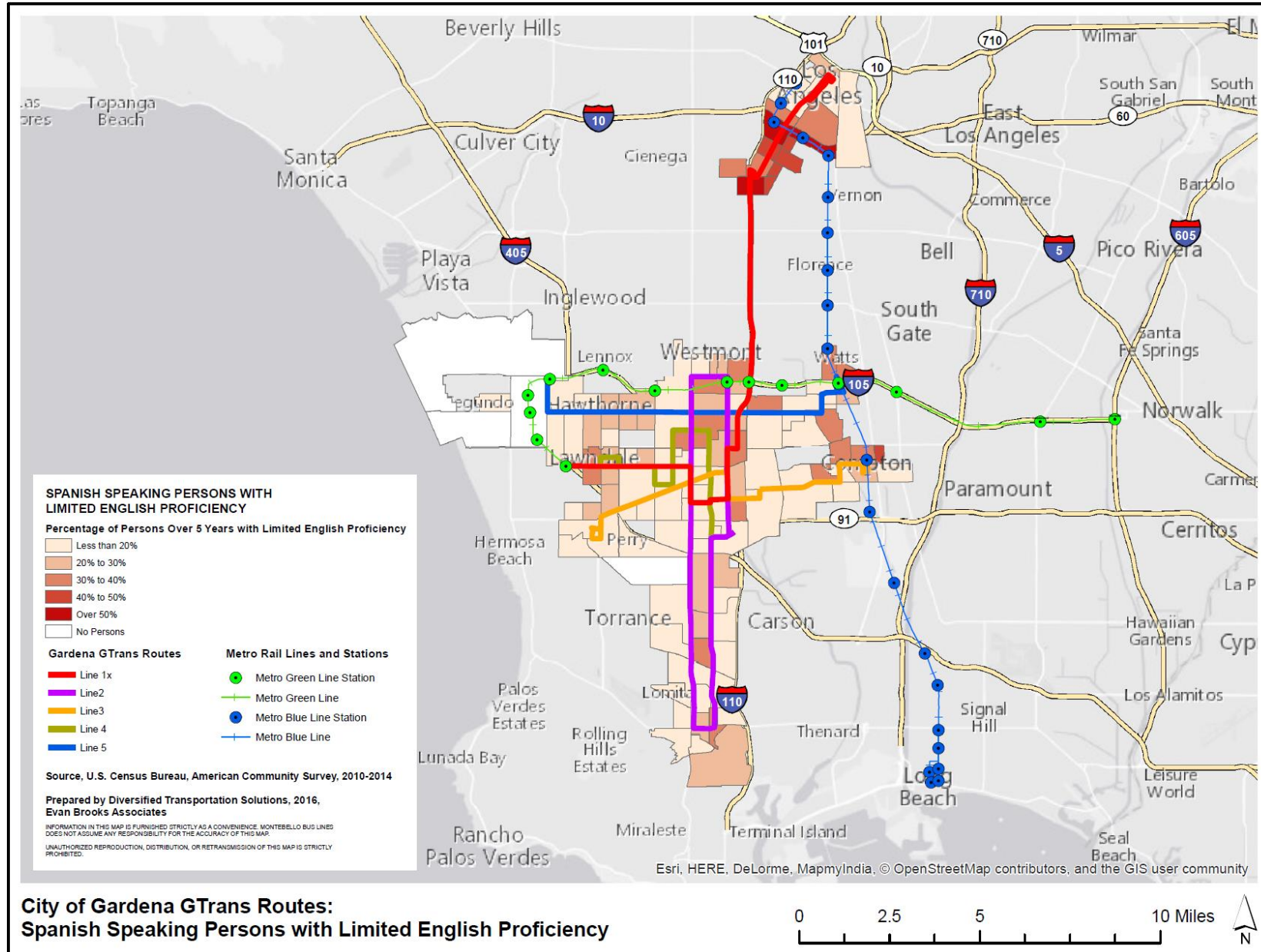
### **2. The frequency with which LEP persons come in contact with GTrans programs, activities or services.**

GTrans 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, GTrans staff has had infrequent requests for assistance in languages other than English. In an optional survey of bus operators, thirty-seven (37) bus operators indicated a fairly high level of interaction with LEP persons. Just over 60% of all bus operators surveyed indicated that they have daily interaction with LEP persons. Approximately 40% 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 and Japanese-speaking passengers. There have been few requests made to bus operators for language translation of public information, with 68% of operators indicating that passengers do not request translated materials.

**Figure 1: Percentage of English Language Spoken by Census Tract**

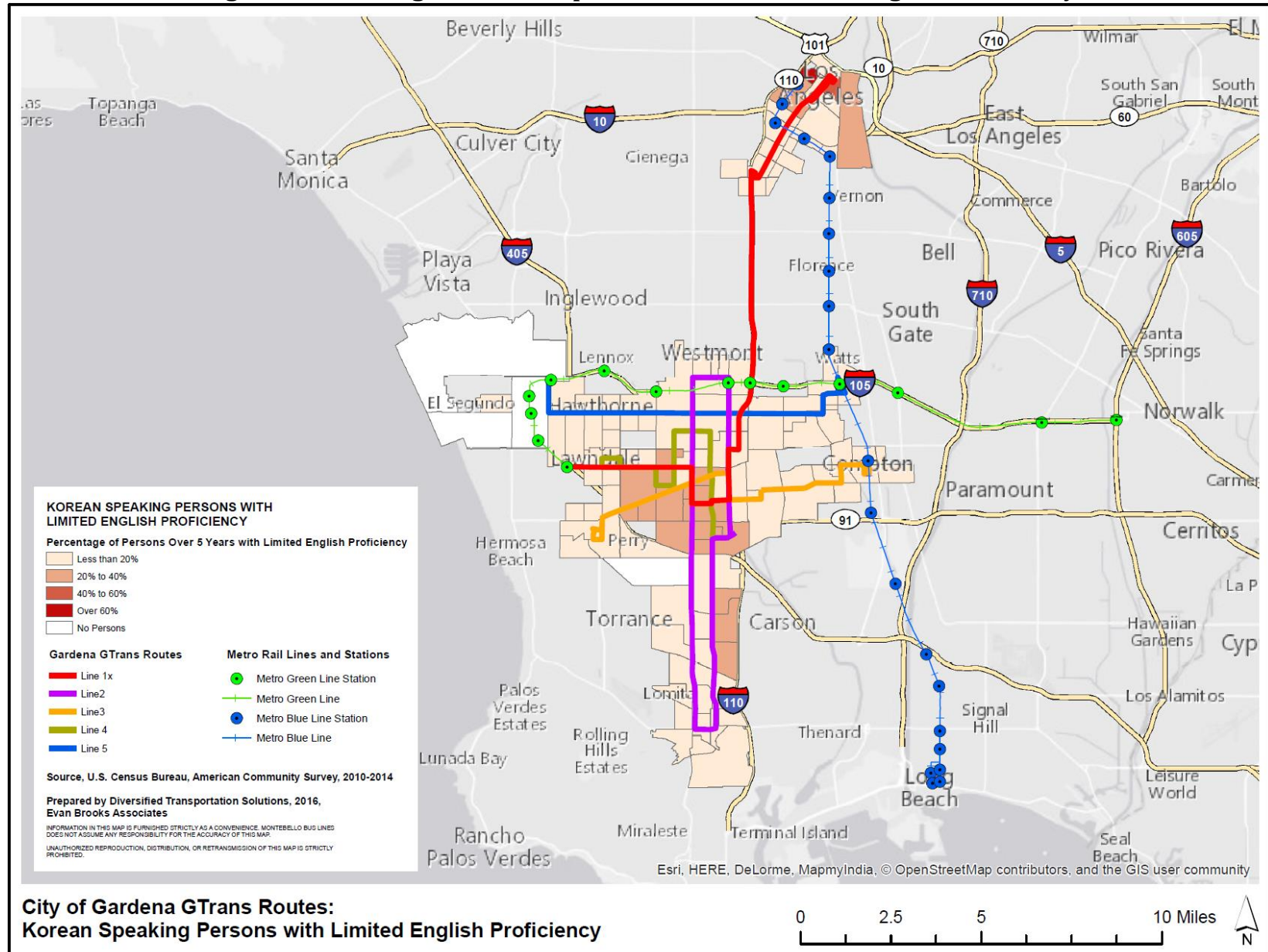


**Figure 2: Percentage of Spanish Speakers with Little or No English Proficiency**



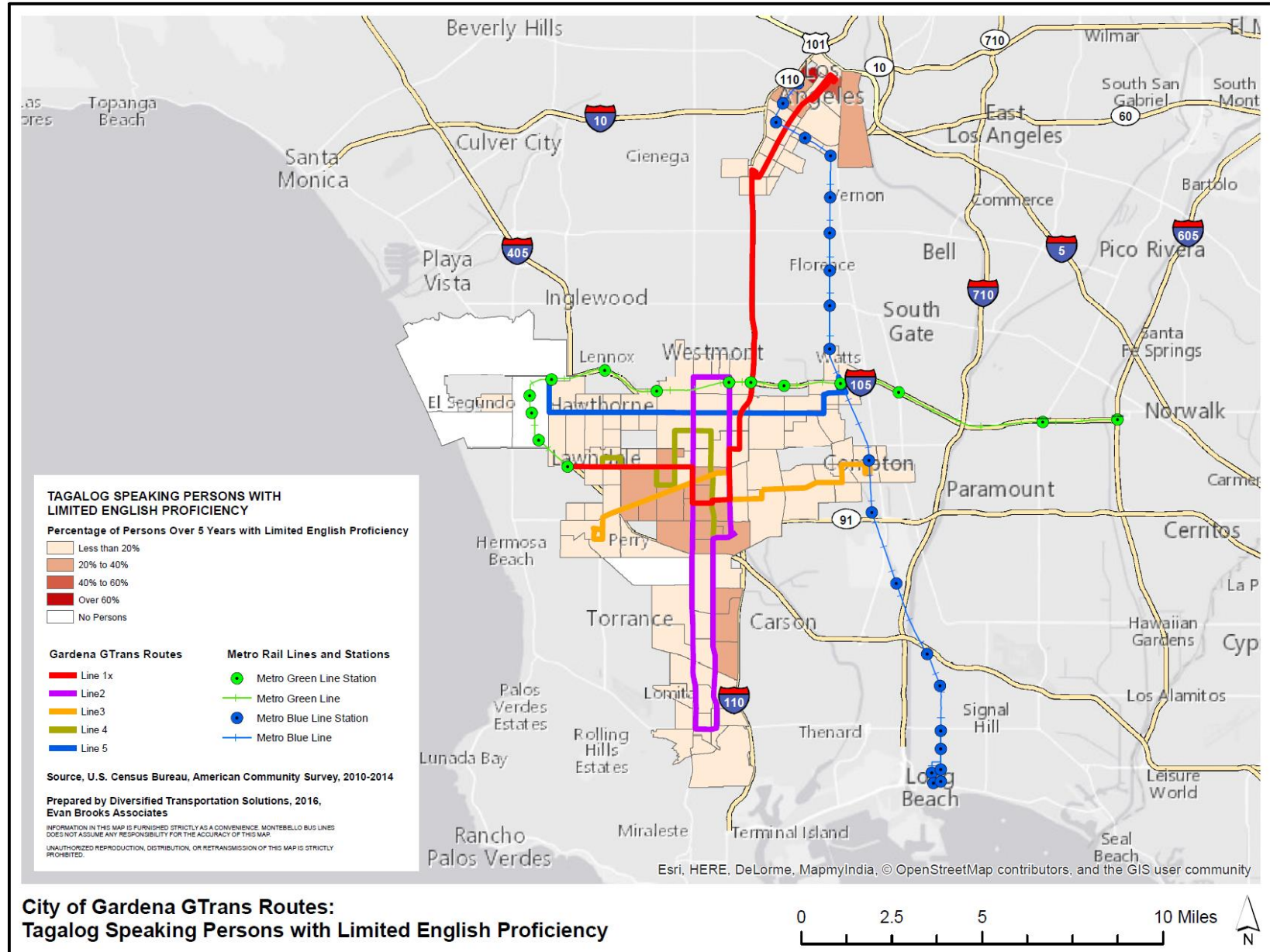


**Figure 3: Percentage of Korean Speakers with Little or No English Proficiency**

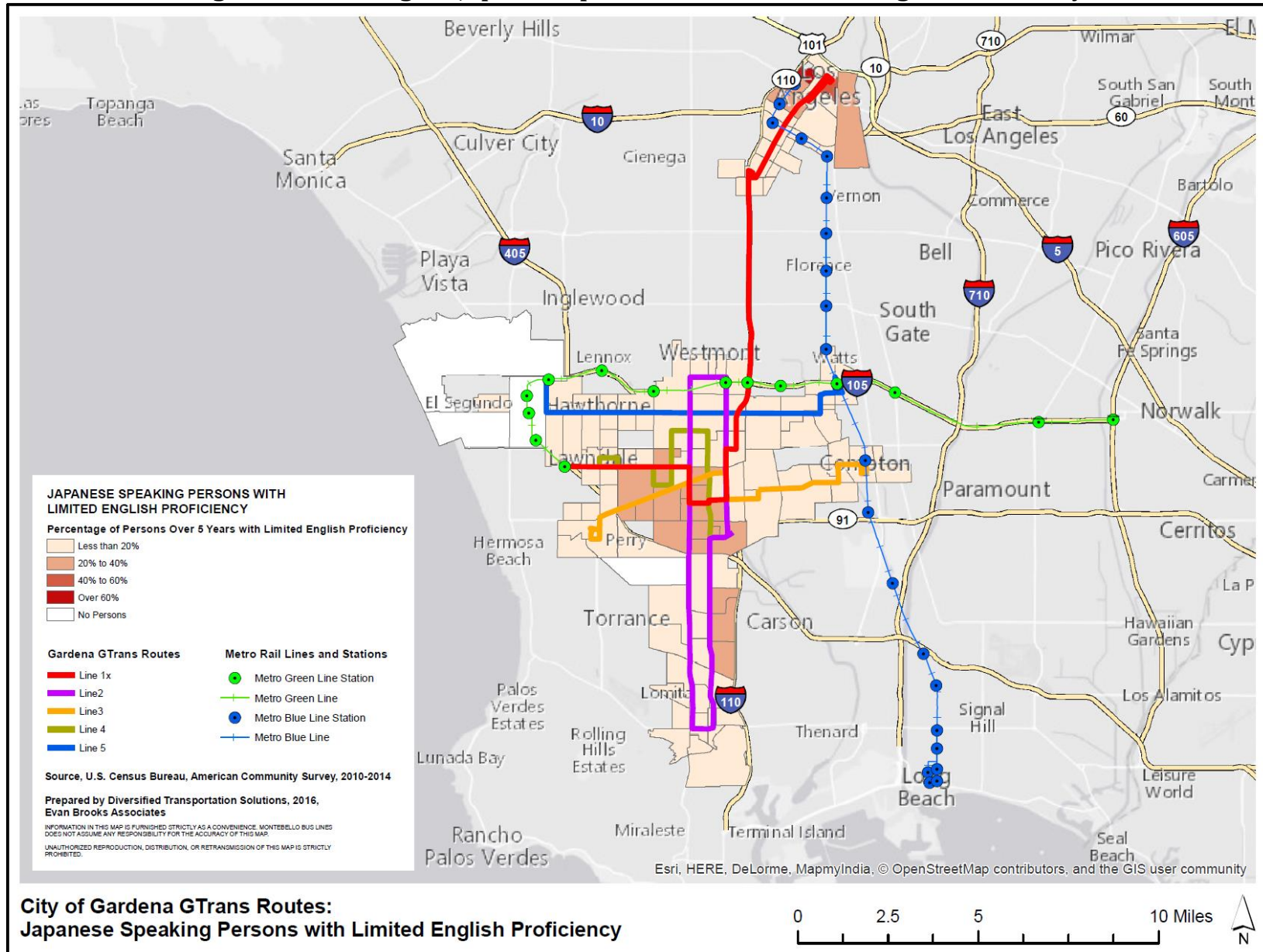




**Figure 4: Percentage of Tagalog Speakers with Little or No English Proficiency**



**Figure 5: Percentage of Japanese Speakers with Little or No English Proficiency**



### **3. The nature and importance of programs, activities or services provided by GTrans to the LEP population.**

As detailed in Figures 1 through 4, census tracts with the majority of limited English speaking persons were located primarily in the Downtown Los Angeles area and along Western and Normandie Avenues, as well as the Redondo Beach Blvd. corridor. Because GTrans service to Downtown Los Angeles is express-oriented with few stops, the largest geographic concentration of LEP individuals in the GTrans service area that has access to local bus service live adjacent to Western and Normandie Avenues and in the Redondo Beach Blvd. corridor. Between 20% - 50% of Spanish-speaking persons in the Western and Normandie Avenue corridors have little or no English proficiency, and between 20%-40% of persons of Korean, Tagalog and Japanese decent in the Redondo Beach Blvd. corridor have little or no English proficiency. The Nakaoka Community Center, located near GTrans Lines 1, 2, 3 and 4, provides literacy programs and English as a Second Language (ESL) classes to community residents. In speaking with a customer service representative of the city-operated community center, they have contact everyday with persons who speak Spanish, Korean and Japanese as a first language. Many participants of the ESL program use transit to access the facility, as well as seniors who ride Gardena Special Transit to the community center, although it is unknown how much they use GTrans compared to other local transit providers (Metro, Torrance Transit). The customer service representative indicated that some comments regarding transit from persons attending the center focused on being unsure of bus stop locations or how to contact GTrans for transit information.

### **4. The resources available to GTrans and overall cost to provide LEP assistance.**

GTrans 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, GTrans 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 GTrans' 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 of a message from one language into another language. GTrans will determine when interpretation and/or translation are needed and are reasonable. How the GTrans 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 GTrans 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 (I Speak) Flashcards* available at GTrans 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 community service centers, such as the Nakaoka Community Center, 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** - GTrans will strive to offer the following measures to LEP individuals, that is, persons who speak English "not well" or "not at all":

- GTrans' Title VI Policy and GTrans 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 GTrans 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, GTrans will provide the language assistance in the LEP client's preferred language. GTrans has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
- GTrans 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 10.

### **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. GTrans' 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.

In the GTrans service area, the Spanish-speaking, Korean-speaking and Tagalog-speaking LEP language groups constitute the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided meet the safe harbor standard. Also, while the Japanese-speaking language group constitutes less than the 5% threshold (3.6%), the concentration of this language group in the service area and their history of participation in the civic and social affairs of the City of Gardena would suggest the inclusion of this language group for written translations of vital documents. To meet the safe harbor standard, GTrans will translate vital documents such as the Route & Schedule Guide, the Title VI Report, the LEP Plan and public notices of changes to transit service into the languages listed above through *Google Translate* on the GTrans website. GTrans staff will utilize features such as *Google Translate* and multi-lingual staff from the City of Gardena (Spanish, Korean, Tagalog and Japanese speakers) to translate for eligible LEP language groups. GTrans will also proceed with oral interpretation options for compliance with LEP regulations.

### **Staff Training**

The following training will be provided to GTrans staff:

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

Information will be distributed to all GTrans staff.

## **Translation of Documents**

- In those cases where the need arises for LEP outreach, GTrans 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, GTrans will provide qualified interpreters, including any bilingual staff of the City of Gardena, if available. The City of Gardena has identified all city staff that speak languages other than English. 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.
- GTrans 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 GTrans 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. GTrans 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 GTrans. If possible, GTrans 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 GTrans has offered free interpreter services, the informal interpreter may interpret.
- If an LEP client wants to use his or her own informal interpreter, GTrans reserves the right to also have a formal interpreter present.

## **Monitoring**

**Monitoring and Updating the LEP Plan** - GTrans will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the GTrans 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 GTrans 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 GTrans LEP Plan**

- A link to the GTrans Title VI Plan and the LEP Plan will be included on the GTrans website, <http://ridegtrans.com/contact/title-vi-report> and at <http://ridegtrans.com/contact/lep-plan>.
- Any person or agency with internet access will be able to access and download the plan from the GTrans 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 GTrans will provide, if feasible.
- Questions or comments regarding the LEP Plan may be submitted to GTrans, 13999 S. Western Avenue, Gardena, CA 90249, phone number (310) 965-8888.

**APPENDIX D:**

**GARDENA CITY COUNCIL APPROVAL OF  
TITLE VI PROGRAM UPDATE**