



City of Gardena's GTrans Title VI Program

October 2022





SYSTEM MAP



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	Line 1X
	Line 2
	Line 3
	Line 3 School Tripper - BIVHS
	Line 4
	Line 5
	Line 7X
	Metro Station



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Overview

Title VI of the Civil Rights Act of 1964

The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin. Title VI of the Act states that “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 subjected to discrimination under any program or activity receiving federal financial assistance.”

To achieve this purpose, each federal department and agency, which provides financial assistance for any program or activity, is authorized and directed by U.S. Department of Justice (DOJ) to put into effect provisions of Title VI for each program or activity by issuing applicable rules, regulations, or requirements.

In this regard, it is the responsibility of applicants, recipients, and sub-recipients of Federal Transit Administration (FTA) assistance, to distribute transit services and related benefits in a manner consistent with Title VI. Title VI requires recipients of federal assistance to monitor and evaluate federally assisted programs for compliance. The FTA is responsible for ensuring compliance of transit agencies receiving federal assistance. FTA Circular 4702.1B describes the monitoring methodology used by recipients. Transit providers must conduct periodic assessments to determine whether the transit service provided to minority communities and minority users is consistent with the objectives cited in this circular. The City of Gardena’s GTrans receives federal assistance for the provision of public transit services and therefore complies with the Civil Rights Act of 1964 and the provision of Title VI.

Presidential Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” of February 1994 places further emphasis on Title VI protections of race and national origin by directing federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations.

All transit providers—whether direct recipients, primary recipients or subrecipients—that receive financial assistance from FTA are also responsible for following the general requirements in FTA 47021.B Chapter IV, which are scaled based on the size of the fixed route transit provider.

Requirements	Transit Providers that Operate Fixed Route Service	Transit Providers that Operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population
Set system-wide standards and policies	Required	Required
Collect and report data	Not required	Required: <ul style="list-style-type: none">• Demographic and service profile maps and charts• Survey data regarding customer demographic and travel patterns
Evaluate service and fare equity changes	Not required	Required
Monitor transit service	Not required	Required

Agency Overview

The City of Gardena is located in the South Bay subregion of Los Angeles County, approximately 12 miles from the downtown Central Business District (CBD) of Los Angeles. Gardena is bounded on the north and west by unincorporated areas of Los Angeles County, as well as the City of Hawthorne and on the south and east by the cities of Los Angeles and Torrance. The City of Gardena was incorporated in 1930 and is governed by a five-member City Council, one of whom is the Mayor and presiding officer. The City Manager, appointed by the Council, administers the day-to-day business of the City.

The City's Transportation Department (GTrans) inaugurated service in 1940 and for over 82 years has been one of three municipal transit operators serving the South Bay subregion of Los Angeles County. GTrans provides fixed-route bus service using a fleet of 52 buses deployed over six routes. Prior to the COVID-19 pandemic, GTrans boarded nearly three million customers annually on the system.

As shown in Exhibit 1, the GTrans service area is quite racially diverse. According to the 2020 American Community Survey, roughly 89 percent of GTrans' service area residents are considered a minority. The minority population includes designations of Hispanic or Latino, African American, Asian, Indian and Alaska Natives, Pacific Islander, or other non-white races including persons of two or more races.

Service is deployed to the City of Gardena and throughout the adjacent communities of Torrance, Redondo Beach, Carson, Compton, City of Los Angeles, Hawthorne, Lawndale, Inglewood, and certain unincorporated areas of Los Angeles County. GTrans also serves downtown Los Angeles and interfaces at several points with Los Angeles County Metropolitan Transportation Authority's (Metro) A (Blue) and C (Green) Line light rail services, J (Silver) Line at Harbor Gateway Transit Center, and Metro bus service. GTrans also connects with Torrance Transit, Beach Cities Transit, Lawndale Beat, the Los Angeles Department of Transportation (LADOT), and the City of Compton's Renaissance Transit. More than two-thirds of the GTrans service area lies outside the City of Gardena boundaries. Customers may transfer between many of these services with a special interagency transfer or the regional LA County monthly EZ Transit Pass.

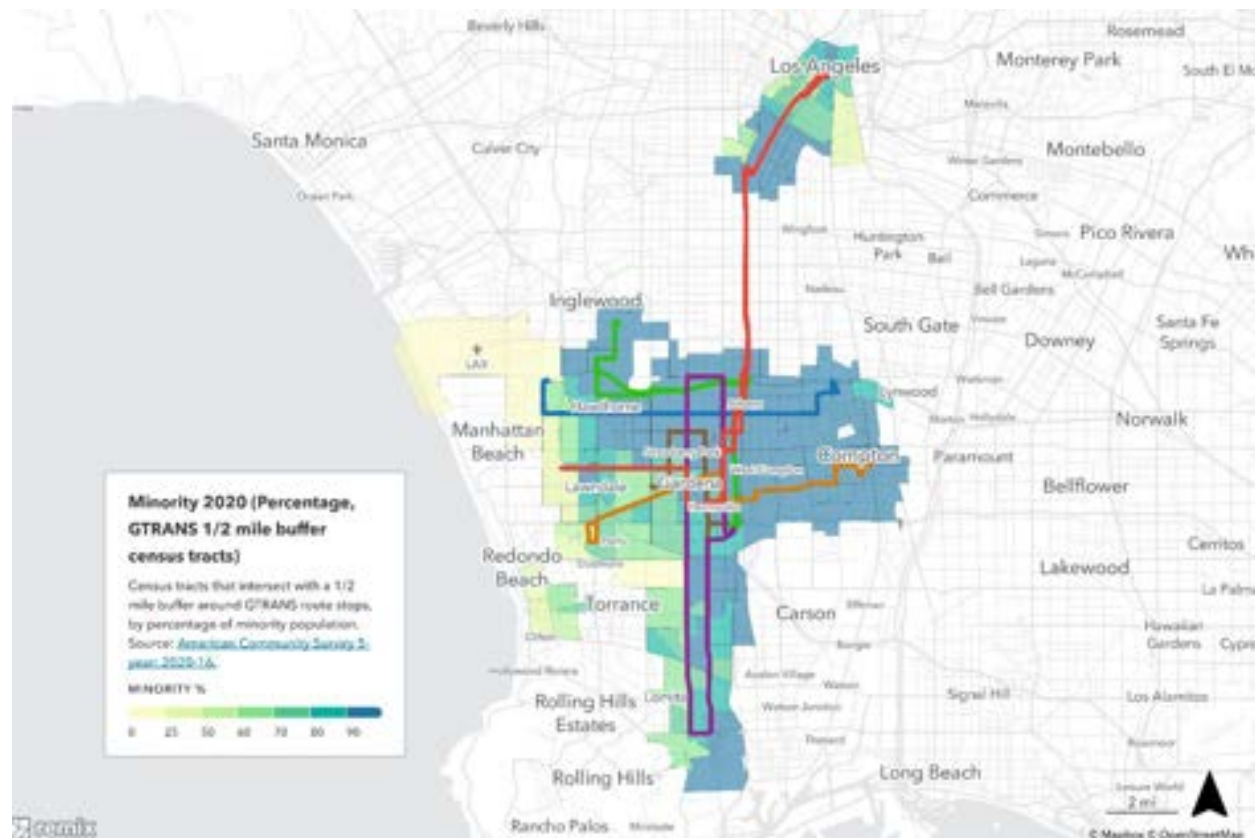
GTrans also operates a demand-response transit service for its elderly and disabled residents called Gardena Special Transit. In addition to the City of Gardena residents, GTrans provides this service on a consolidated basis to the elderly and disabled residents of Hawthorne and the Los Angeles County unincorporated areas of Del Aire and Alondra Park. This service is provided in addition to that which is provided by Access Services, Inc., the Los Angeles County complementary paratransit service mandated by the Americans with Disabilities Act of 1990 (ADA).

GTrans operates out of its main Administrative, Operations, and Maintenance facility located at 13999 S. Western Avenue in Gardena.

GTrans' fixed-route revenue fleet consists of 66 vehicles: 52, 40-foot buses, and fourteen contingency buses. GTrans also operates eight Special Transit vehicles, including four vans and four cutaway vehicles. GTrans' active fixed-route fleet consists of gasoline hybrid electric buses (model years 2005, 2009 and 2010), electric buses (both battery-electric conversion and traditional electric buses), and CNG buses.

GTrans has adopted an alternative fuel strategy for the immediate future to include 80 percent Compressed Natural Gas (CNG) and 20 percent zero-emission buses. GTrans deployed its first order of 18 CNG buses, and is awaiting delivery of another 21, along with an additional seven zero-emission battery electric buses that will replace all of the gasoline hybrid electric buses in its fleet. All buses use low-floor, curb-level technology, and all are fully ADA accessible. Fixed-route buses can accommodate up to three bikes.

Exhibit I GTrans Bus Lines Title VI Census Tracts in Service Area, Minorities Per Census Tract



Services Provided

Fixed Route Bus Service

Fixed-route service is normally provided with an active fleet of 52 buses distributed over six routes with a pre-COVID-19 weekday peak requirement of 43 buses. However, as a result of the COVID-19 pandemic and a historic drop in ridership GTrans has a peak requirement of 24 buses. As such, GTrans falls under the Title VI requirements of Transit Providers that Operate Fixed Route Service.

Service operates weekdays throughout the fixed-route system from 4:25 a.m. to 10:23 p.m., and on four routes on weekends from 4:44 a.m. to 9:38 p.m.

Special Transit Service

GTrans also operates paratransit service using eight accessible cutaway and minivan vehicles for senior citizens and persons with disabilities. This locally-funded service is in addition to Access Service, Inc., the Los Angeles County complementary paratransit service mandated by the Americans with Disabilities Act of 1990 (ADA). Residents of Gardena, Hawthorne and unincorporated areas of Alondra Park and Del Aire in Los Angeles County are eligible for this service.

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.

General Reporting Requirements

Civil Rights Notice to the Public

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 GTrans' Route and Schedule Guide, on the GTrans website www.RideGTrans.com, onboard GTrans buses and in the lobby of GTrans' Administrative, Operations and Maintenance headquarters, located at 13999 S. Western Avenue in Gardena:

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, national origin, as protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that 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, or national origin.

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the 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 complaint 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*

Complaint forms can be obtained at GTrans' website:

<http://ridegtrans.com/contact/title-vi-complaint-form/>

To request additional information regarding Title VI, please call 310-965-8888 or email titlevi@gardenabus.com.

Procedures for Reviewing a Title VI Complaint

The following is a summary of the procedures GTrans uses for the investigation and resolution of the formal Title VI complaints. Please see **Appendix A for GTrans' Title VI Complaint Form**, the formal complaint procedures provided to the public and the GTrans' internal procedures for Title VI complaint handling.

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

1. GTrans staff will accept either the formal Title VI Complaint form or if a customer calls in to complain about discrimination, staff will submit the complaint on his/her behalf through the Trapeze COM system and identify it as a potential Title VI complaint. For either method or receipt, staff will proceed in accordance with the process below.
2. 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.
3. 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.
4. GTrans has 90 days to investigate the complaint. If more information is needed to resolve the case, GTrans may contact the complainant via phone or letter. The complainant has 15 business days from the date of the call or letter to send requested information to the personnel assigned to investigate the complaint. If the investigator is not contacted by the complainant or GTrans does not receive the additional information within 60 business days, GTrans can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.
5. 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. A 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 business days after the date of the LOF to do so.
6. 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 Investigations, Complaints and Lawsuits

GTrans has had no lawsuits and two complaints alleging discrimination under Title VI since the submittal of its 2019 Title VI Program. Of the two complaints alleging discrimination, none was substantiated and GTrans is not aware of any formal Title VI complaints filed with the FTA.

For a summary listing of the Title VI Investigations, Complaints and Lawsuits please see Appendix B.

Public Engagement Process

The City of Gardena's GTrans continually monitors and considers the impact of various service decisions as they relate to the community and customers using the service.

As required by FTA Circular 9030.1E, Chapter VI Program Management and Administrative Requirements, the City of Gardena's GTrans must establish a process to solicit and consider public comment prior to raising fares or implementing a major reduction of transit services. The policy should provide an opportunity for a public hearing or public meeting for any fare increase or major service reduction and should describe how the recipient will conduct such meetings and how the recipient will consider the result of such meetings in the process of changing fares and service.

The purpose of GTrans' Public Participation Process is to promote public involvement in transit planning decision-making activities. This plan establishes formal procedures that allow for, encourage, and monitor public participation within the GTrans service area, including, but not limited to, minority individuals, persons with Limited English Proficiency, and low-income populations.

GTrans proposed service changes in late 2019 to provide improvements to its transit system in early 2020; however, due to the COVID-19 pandemic, the changes were put on hold. Before the pandemic, however, GTrans had the opportunity to request public comment on these changes through a series of community meetings (August 21st, September 3rd, and September 7th, 2019), and outreach pop-ups at the Los Angeles Southwest College, Gardena One-Stop, along the affected routes (Line 1X, Line 3, and Line 4). Comments were reviewed and considered in the final recommendation to the City Council. Ultimately, the changes were approved by the Gardena City Council and scheduled for implementation in early 2020, but put on hold because of the pandemic.

During the 2020 COVID-19 pandemic, GTrans quickly modified its service across all lines to ensure the safety of passengers and bus operators. On March 27, 2020, a notice by the City Manager was released stating that GTrans service would be reduced effective March 29, 2020. As COVID-19 continued to spread, more updates were released via social media, bus signage, and GTrans' website indicating additional safety measures including the mask requirement, entrance through the rear doors, suspended fare enforcement, and physical distancing.

In 2021, GTrans began to slowly restore its service and in July 2021 resumed enforcement of fare payment. To inform the public of the changes, GTrans held a public meeting on July 28, 2021 to present the Service Restoration Plan, offering an opportunity for the public to provide input on GTrans' plans to return service to pre-pandemic levels. Another hearing was held on March 31, 2022, where GTrans gave an update on the Service Restoration Plan and solicited input on GTrans' proposal to make permanent its new Line 7X service and change the child fare changes.

Also in 2020 and 2021, GTrans worked with regional transit operators and Metro to implement the GoPass fareless pilot program, which allows free rides for students in participating school districts and community colleges. GTrans became part of the pilot program in November 2021, following City Council approval.

While these occasions provided a more formal opportunity to interact and engage with the public, GTrans increased its outreach with more informal opportunities as well. Once the pandemic stay-at-home orders were lifted and the COVID-19 vaccination allowed case counts to decrease, GTrans was able to engage with the community in person. The following are some occasions where GTrans had the opportunity to outreach:

- Gardena Police Department National Night Out - A community outreach event where GTrans distributed transit information and showcased its services.
- Operation Backpack - Provided transit information to local school-aged students and parents.

- Los Angeles Southwest College DAZE Resource Fair - Shared information about GTrans and the fareless program with incoming college students.
- Back to School Night and Orientation at Animo Legacy, Peary Middle School, and Gardena High School - Shared information about GTrans and the fareless program.
- Kids at the Park - A Gardena Recreation event where GTrans shared information about its services with local parents and kids.
- Youth in Government Day - A City event where GTrans had the opportunity to share information about its careers and receive feedback from students regarding its services.
- Coffee with a Cop - A public networking opportunity for residents to ask any questions about the police department and learn about resources offered by city departments including GTrans.
- Annual Heritage Street Festival - A City of Gardena's fair held at City Hall where GTrans had the opportunity to network with a diverse group of businesses and distribute transit information.
- Nakaoka Center Senior Day - Provided seniors with information on how to ride the bus and discussed public transit safety concerns.
- Annual City of Gardena Jazz Fest - A City of Gardena festival held at Rowley Park, where GTrans provides transit information to the community.
- City of Gardena's Earth Day Event - A City celebration where GTrans shares information about its Clean Air Projects and the use of public transportation.
- Martin Luther King Jr. and Cinco de Mayo Celebrations - City events where GTrans had the opportunity to share transit information with diverse groups.
- Bring it On the Blvd Event - A local street fair where many organizations, including GTrans, passed out flyers and information regarding its resources.
- Unity Breakfast - Networking opportunity where GTrans shares information with church groups.
- Gardena Valley Baptist Church Summer Festival - Fourth of July celebration at a local church, where GTrans provided information about its services.
- New Mount Calvary's Health and Wellness Pavilion - Local resource fair where GTrans gave information about transit services.

Please see GTrans' adopted Public Participation Process for Fare and Service Changes in Appendix C.

Language Assistance Plan

Individuals who have a limited ability to read, write, speak or understand English are considered persons with Limited English Proficiency (LEP). In Los Angeles County, according to the U.S. Census records, approximately one-quarter of the County's residents would describe themselves as being able to communicate in English less than "very well."

Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes discrimination based upon national origin. In conjunction with the development of its 2022 Title VI Program, GTrans updated its Language Assistance Plan and four-factor analysis of services provided to the LEP population

For a copy of GTrans' Language Assistance Plan and Four Factor Analysis, please see Appendix D.

Membership of Non-Elected Committees and Councils

GTrans does not select membership to any transit-related, non-elected planning boards, advisory councils or committees, or similar bodies.

Monitoring of Subrecipients and Contractors

For the reporting period, GTrans did not have any subrecipients that received federal financial assistance from the FTA.

Fixed Facility Impact Analysis

GTrans has not constructed any new fixed facilities since the submission of its 2019 Title VI Program and thus has not performed a fixed facility impact analysis.

City Council Approval of Title VI Program

GTrans 2022 Title VI received governing body approval by the City of Gardena's City Council on September 27, 2022. Please see Appendix E for a copy of the agenda and minutes.

Program Specific Requirements

System-Wide Service Standards

Service performance standards are necessary to ensure that all services are contributing positively to the transit network and the overall financial stability of GTrans. Performance should be measured regularly to identify trends over time and to allow prompt changes to be enacted if necessary. GTrans has adopted quantitative system-wide service standards for its fixed route services. These standards, which are summarized below, were developed and implemented to better help GTrans achieve equity for all its transit customers in service design and operations decisions.

Performance standards help ensure that GTrans services are equitably provided, useful to customers and cost-effective for the organization.

Passenger Load

Passenger load is the ratio of passengers on the vehicle to the number of seats on the bus. If the passenger load is high, resulting in overcrowded conditions, additional service may be needed to address the issue. 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.

Passenger Load	
Service Type	Passenger Load Factor
Local Service	125% of seated capacity
Express Service	100% of seated capacity

Vehicle Headway

Vehicle headway is the measurement of time between buses on a line. A shorter headway corresponds to service that is more frequent. 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.

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 five minutes from the scheduled time. Currently, on-time performance is monitored using field supervision checks on specific trips. GTrans is currently in the middle of a project to deploy a CAD/AVL system that will provide a more effective way of tracking on-time performance.

Service Availability

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 primarily provides fixed-route service 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 transit operators, including Torrance Transit, Beach Cities Transit and LA Metro – who provide services at or near many GTrans bus stops –

patrons have many options to access public transportation services in addition to GTrans. The many operators in the region also coordinate regularly to reduce unnecessary duplication of routes and promote a more even distribution of transit services.

GTrans' general standard is to have stops spaced approximately one-quarter mile apart, although stops may be located more closely depending on land use. Stops may be located further apart if safety conditions do not allow a safe stop to be placed within one-quarter mile of the previous stop. Where site conditions allow, GTrans aims to have far-side stops, which reduce conflict with right-turning vehicles, eliminate sight-distance deficiencies at intersection approaches, and encourage pedestrians to cross behind the bus. Please see Appendix F for GTrans' Bus Stop Policy.

System-Wide Service Policies

In accordance with FTA Title VI Guidelines, recipients of federal assistance must develop policies for the equitable distribution of transit amenities and buses. GTrans has adopted quantitative system-wide service policies for its fixed-route services which, as summarized below, were developed and implemented to help GTrans better achieve equity for all its transit customers in service design and operations decisions.

Distribution of Transit Amenities

Transit amenities refer to items of comfort, convenience and safety that are available to the general riding public. Amenities may include but are not limited to bus stop benches, shelters, lighting, trash receptacles and bike racks. Transit amenities are sited in accordance with GTrans' Bus Stop Policy (See Appendix F).

Within GTrans' service area, bus stop amenities may be provided by GTrans or by one or more of a number of other sources including local governments, private developers, citizen groups, other transit agencies and commercial advertisers. In general, GTrans has jurisdiction over the location and type of amenities placed within the City of Gardena. Specific equipment and placement at existing bus stops in Gardena is done by GTrans in accordance with all applicable municipal regulatory and permitting processes.

Outside of the City, each municipality is responsible for determining the type of amenities at each existing bus stop. GTrans may recommend or provide information on its standard equipment used within the City of Gardena; however, each city is responsible for selecting and installing amenities at bus stops within its jurisdiction. GTrans will regularly evaluate the conditions and needs of bus stops in its service area and will meet with other cities to provide recommendations for changes to bus stops. With regard to amenities and their placement, GTrans will also consider the input and recommendations from its bus operators and employees, as well as customers, community, and business stakeholders.

The table below outlines GTrans' method of determining what amenities are placed, by GTrans, at bus stops for which it has the ability to decide, and when capital funding resources become available. Currently, GTrans does not have shelters installed at any of the stops within the City of Gardena, however GTrans is currently seeking funding for this future project.

Transit Amenities		
Average Weekday Boardings	Category	Amenities Provided
>100	Tier 1	Seating, lighting, trash receptacles and bus stop signage. These stops will be considered for bus shelters if policy allows.
15-99	Tier 2	Seating, lighting and bus stop signage
<15	Tier 3	Bus stop signage and trash receptacles

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the transit system to ensure that all communities receive the same benefits derived from the transit vehicles. GTrans' entire fleet of transit buses is 100 percent ADA compliant, with wheelchair securement devices, ramps, and kneeling capabilities. Also standard are air conditioning, bike racks and voice annunciators. GTrans' fleet of 40-foot buses comes equipped with innovative design functions and state-of-the-art propulsion technology.

Vehicle age is also considered a benefit, as it is generally considered a proxy for the condition of the vehicle. 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.

Fare and Service Equity Analyses

GTrans has implemented service changes and changes to its fare policies since the implementation of its last Title VI Program. However, GTrans operates fewer than 50 buses in peak service, falling within the category of reporters that are not required to perform formal evaluations of service and fare equity changes. GTrans is committed to ensuring all such changes do not result in disparate impacts on the basis of race, color, or national origin.

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Appendix A

Title VI Complaint Form and Procedures for Reviewing Complaints



Title VI Complaint Form
City of Gardena's GTrans

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 GTrans Customer Service by calling (310) 965-8888.

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Email Address:		
Section II:		
Are you filing this complaint on your own behalf?	Yes* <input type="checkbox"/>	No <input type="checkbox"/>
*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
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 (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.		

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Section IV:		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V:		
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: _____		
Section VI:		
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

July 2022



Title VI Complaint Procedures for GTrans

July 2022

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:

1. Contact information (name, address, phone number)
2. 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.



TASHA CERDA, Mayor / PAULETTE C. FRANCIS, Mayor Pro Tem
MARK E. HENDERSON, Councilmember / RODNEY G. TANAKA, Councilmember / WANDA LOVE, Councilmember
MINA SEMENZA, City Clerk / GUY MATO, City Treasurer / CLINT OSORIO, City Manager / CARMEN VASQUEZ, City Attorney

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

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

Complainants may also file a Title VI complaint with an external entity like the FTA, courts, or other agencies (at the state or federal level). However, should a complaint be filed with GTrans and an external entity simultaneously, the external complaint will supersede the GTrans complaint. At that point, the GTrans complaint procedures will be suspended pending the external entity's findings.

To request additional information regarding Title VI, please call 310-965-8888 or email titlevi@gardenabus.com.



Title VI Complaint Procedures for GTrans (Internal) July 2022

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

1. GTrans staff will accept either the formal Title VI Complaint form or if a customer calls in to complain about discrimination, staff will submit the complaint on his/her behalf through the Trapeze COM system and identify it as a potential Title VI complaint. For either method or receipt, staff will proceed in accordance with the process below.
2. 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.
3. 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.
4. GTrans has 90 days to investigate the complaint. If more information is needed to resolve the case, GTrans may contact the complainant via phone or letter. The complainant has 15 business days from the date of the call or letter to send requested information to the personnel assigned to investigate the complaint. If the investigator is not contacted by the complainant or GTrans does not receive the additional information within 60 business days, GTrans can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.
5. 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. A 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 business days after the date of the LOF to do so.
6. A detailed record of all Title VI complaints and the City's response will be kept on file for a minimum of five years.



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MARK E. HENDERSON, Councilmember / RODNEY G. TANAKA, Councilmember / WANDA LOVE, Councilmember
MINA SEMENZA, City Clerk / GUY MATO, City Treasurer / CLINT OSORIO, City Manager / CARMEN VASQUEZ, City Attorney



Appendix B

Title VI Investigations, Complaints and Lawsuits



List of Transit-Related Title VI Investigations, Lawsuits and Complaints Since Last Program Submittal in 2019

Type	Date	Summary	Status	Action(s) Taken
Investigations				
	N/A	N/A	N/A	N/A
Lawsuits				
	N/A	N/A	N/A	N/A
Complaints				
1	5/6/2021	The complainant alleged GTrans operator deliberately did not stop to allow her to disembark at the requested stop. The complainant believes it was intentional and possibly due to racial discrimination.	Investigation found complaint to be not valid for Title VI	Sent Closeout Letter
2	6/2/2021	The complainant alleged the GTrans operator racially discriminated a passenger by requiring a passenger of one race to wear a mask but not requiring another passenger from another race to wear the mask.	Investigation found complaint to be not valid for Title VI	Sent Closeout Letter



Appendix C

Public Participation Process for Fare and Service Changes



GTrans Major Service Change Policy

The purpose of this policy is to establish a threshold that defines a "major" service change for service provided by GTrans, including its fixed route and Special Transit modes.

The following types of service changes shall be considered "major" service changes:

- a) The addition of a new route;
- b) The elimination of a route;
- c) A reduction of 25 percent or more in total vehicle revenue miles in service on any specific route;
- d) An increase of 25 percent or more in total vehicle revenue miles in service on any specific route;
- e) A change in the daily span of service or frequency affecting 25 percent or more of route's vehicle hours;

The following types of modifications are not classified as "major" service changes:

- a) Temporary route detours caused by road construction, maintenance, closures, emergencies, labor strikes, fuels shortages or safety concerns;
- b) Route number designation changes;
- c) Seasonal service changes;
- d) The introduction or discontinuation of short or limited-term service (e.g., pilot, promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than 18 months;
- e) Any service change that does not meet the conditions of a major service changes as defined above.

Service change proposals that do not meet the criteria for "major" service changes are still subject to an appropriate level of public review and comment.

The City of Gardena's GTrans shall consider the degree of adverse effects and analyze those effects when planning major service changes.

June 2021



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MARK E. HENDERSON, Councilmember / RODNEY G. TANAKA, Councilmember / WANDA LOYE, Councilmember
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GTrans Public Participation Process for Fare and Service Changes

Background

The City of Gardena's GTrans continually monitors and considers the impact of various service decisions as they relate to the community and customers using the service.

As required by FTA Circular 9030.1E, Chapter VI Program Management and Administrative Requirements, the City of Gardena's GTrans must establish a process to solicit and consider public comment prior to raising fares or implementing a major reduction of transit services. The policy should provide an opportunity for a public hearing or public meeting for any fare increase or major service reduction and should describe how the recipient will conduct such meetings and how the recipient will consider the result of such meetings in the process of changing fares and service.

Participation Principles

It is the goal of GTrans to provide customers and community members the opportunity to participate in the transportation planning process and to provide input on service and fare proposals. Further, GTrans strives to thoughtfully consider the issues and concerns of the public when determining the prospect of major service reductions or fare increases, so as to not disproportionately burden any population with adverse impacts.

As such, changes to GTrans service resulting in major service reductions or fare increases may be the subject of a public meeting or a public hearing. Public input shall be solicited while such proposals are under consideration. Customers and the public shall also be notified prior to the implementation of any major changes in service.

Furthermore, GTrans will:

- Determine what non-English languages and other barriers may exist to public participation within the service area
- Provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area
- Hold public meetings 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
- Broadly advertise public meetings and hearings in the community in non-English languages identified in the updated LEP Plan through a variety of methods describing the proposed changes as well as at major transit stops, local print media, and local community centers
- Provide notification regarding the availability of language assistance at public meeting as described in the LEP Plan



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Public Participation

Procedural Actions

To enhance public participation, legal notification of a public hearing and public comment will occur no fewer than 14 days prior to the hearing or meeting. This notice will set a specific place, date and time for one or more public hearings and will identify the dates during which public comment will be accepted. The public comment period will be no fewer than 10 days.

The following procedures, strategies, techniques and media may be utilized to engage and notify the public in advance of a public hearing and prior to the City of Gardena's approval.

- Place printed material, such as interior car cards, flyers, customer bulletins, on board buses and at transit hub(s) and at public, City of Gardena facilities
- Provide information on City of Gardena and/or GTrans websites
- Post information using social media outlets such as Facebook, Instagram or Twitter
- Conduct presentations and/or issue correspondence to professional, governmental, non-profit and student stakeholder organizations
- Conduct GTrans system user and non-user surveys

Scheduling and Conducting Public Hearings

Hearings will be conducted by the City of Gardena (City Council or City Staff) in person or online and at the time selected. The facility utilized for the public hearings will be accessible to persons with disabilities.

Forms will be made available to register interested person's presence and desire to speak. Public hearings will begin with a reading of the public notice, purpose and proposed action that necessitate the public hearing. After a presentation of the proposed action is completed, the public will be invited to offer their comments. The Hearing Officer will instruct the public as to the amount of time each speaker has for public comment. After all register persons have commented the Hearing Officer will close the public hearing

Addressing Public Comments Received

All relevant comments received verbally or in writing at a public hearing or as otherwise conveyed to GTrans prior to the established deadline will be entered into the public record of the comment process. Subsequent to the comment period, staff will evaluate and analyze all relevant comments received and prepare a written report for consideration by the City of Gardena's City Council.



Appendix D

GTrans' Language Assistance Plan and Four-Factor Analysis



LANGUAGE ASSISTANCE PLAN 2022

Analysis of Persons with Limited English Proficiency (LEP) and
Language Assistance Plan

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1. Introduction

This Limited English Proficiency Plan (LEP) 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. 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 has been prepared in accordance with Title VI of the Civil Rights Act of 1964 which states: "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjugated 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.

2. GTrans Background

The City of Gardena's GTrans began operation of transit services in 1940 in response to a stoppage of railroad services between the areas of the South Bay and Downtown Los Angeles. In 2015, Gardena Municipal Bus Lines rebranded and officially changed its name to GTrans and unveiled a new modern bus design and logo.

GTrans is a City department that operates as an enterprise fund and is self-supported. It is not operated with any of the City's general funds.

GTrans serves several local communities that include: the City of Gardena, Torrance, Lomita, West Carson, Compton, Hawthorne, Lawndale, and certain parts of downtown Los Angeles and Inglewood. The City of Gardena is six square miles and is situated in the South Bay area of metropolitan Los Angeles between Athens to the north, City of Torrance to the south, Harbor Gateway to the east, and the City of Hawthorne and City of Lawndale to the west. GTrans' total service encompasses 87.5 square miles with a population of approximately 816,700 people according to the U.S. Census Bureau.

Services Provided

Local Fixed Route Service

GTrans provides transportation to area residents with fixed bus routes that serve many local communities and provide access to Metro Rail and Downtown Los Angeles. GTrans' fixed-route revenue fleet consists of 66 vehicles: 52, 40-foot buses, and fourteen contingency buses. GTrans also operates eight Special Transit vehicles, including four vans and four cutaway vehicles. GTrans' active fixed-route fleet consists of gasoline hybrid electric buses (model years 2005, 2009 and 2010), electric buses (both battery-electric conversion and traditional electric buses), and CNG buses. All buses use low-floor, curb level technology, and are fully ADA accessible. Current fixed route buses can accommodate two to three bikes.

Special Transit

GTrans operates demand response services for senior citizens and disabled residents of Gardena, Hawthorne, and the unincorporated areas of El Camino Village, and Del Aire in Los Angeles County. The fleet is comprised of eight vehicles that are fully ADA accessible. The service normally would operate Monday to Friday 7:00 a.m. – 5:00 p.m., Saturdays from 8:00 a.m. – 5:00 p.m., and Sunday and Holiday service 8:00 a.m. – 2:30 p.m. Due to the COVID-19 pandemic and shortage of drivers, GTrans modified

its schedule to Monday to Friday 7:00 a.m. – 4:30 p.m., and every other Saturday from 8:00 a.m. – 2:00 p.m. Interested residents can apply for the special transit card at the Gardena Senior Citizens Bureau or Hawthorne Memorial Center.

Regular fare for a one-way trip is \$0.75. Legally blind passengers ride free, riders from the Gardena Senior Citizens Bureau may purchase S.S.I. tickets for \$0.50 cents each, and the City of Hawthorne sells dial-a-ride tokens to its residents for \$0.75 cents one-way. An aide assisting a passenger with disabilities rides free of charge; however, the person requiring the aide must have the ID card that specifies the need for the aide service.

3. Four Factor Analysis

Factor 1: The Number and Proportion of LEP Individuals Served or Encounters in the Eligible Service Population

What the Guidance Says:

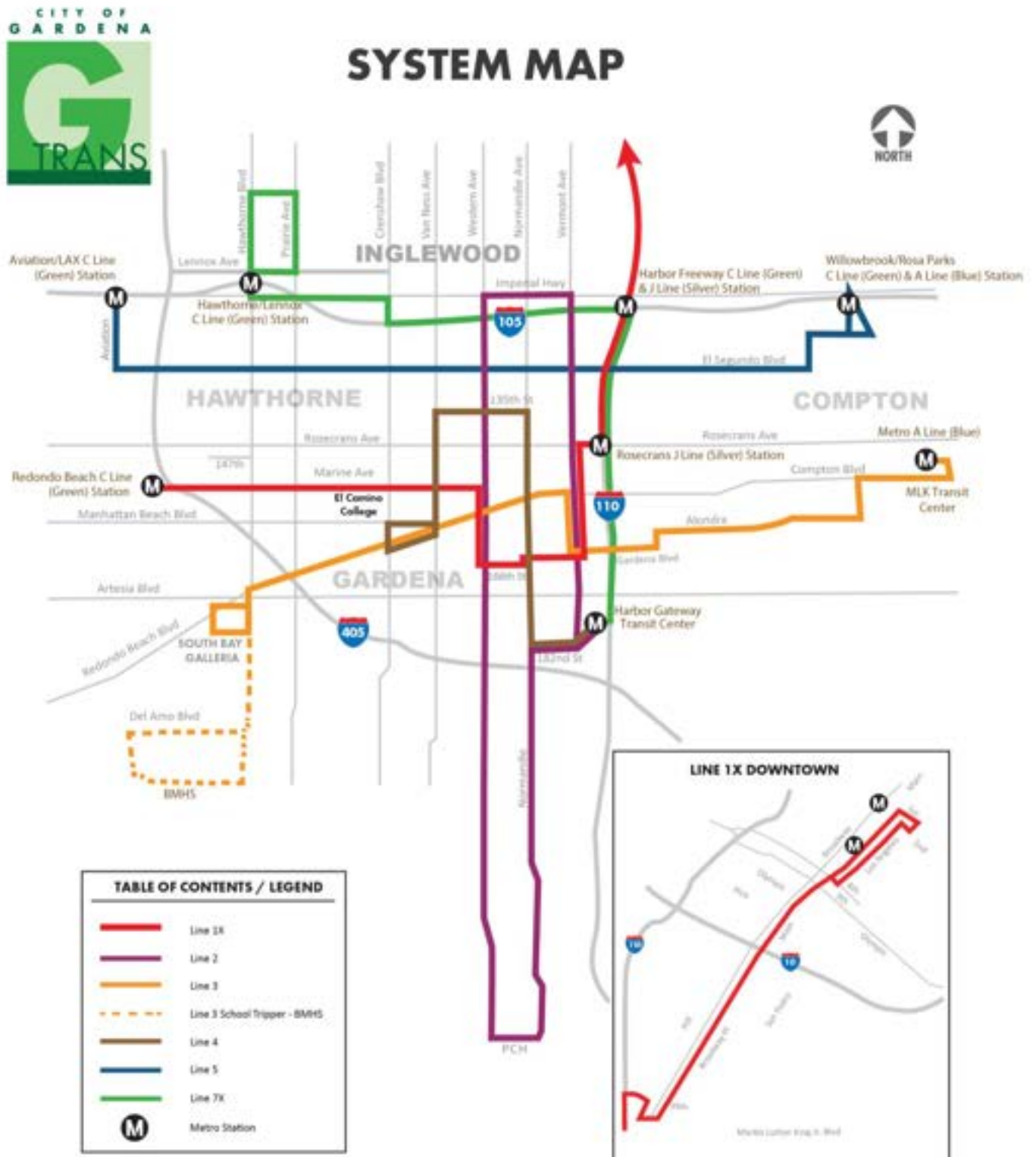
“The greater the number or proportion of LEP individuals from a particular language group served or encountered in the eligible service population, the more likely language services are needed”

Being a part of the diverse communities served by GTrans, the agency has regularly encountered LEP individuals throughout its day-to-day operations. Accordingly, GTrans, works to ensure that all individuals have access to this vital information which allows them to use the transit system. To follow are some examples of the typical interaction GTrans has with LEP individuals:

- Customer Service Call Center
- Customer Service Front Desk at GTrans
- Community meetings
- Special Transit dispatch
- Bus operators
- Public hearings
- Schedules, brochures, and other printed materials
- Customer and Community surveys
- Public outreach team and events
- GTrans website
- GTrans social media, including Facebook, Instagram, and Twitter

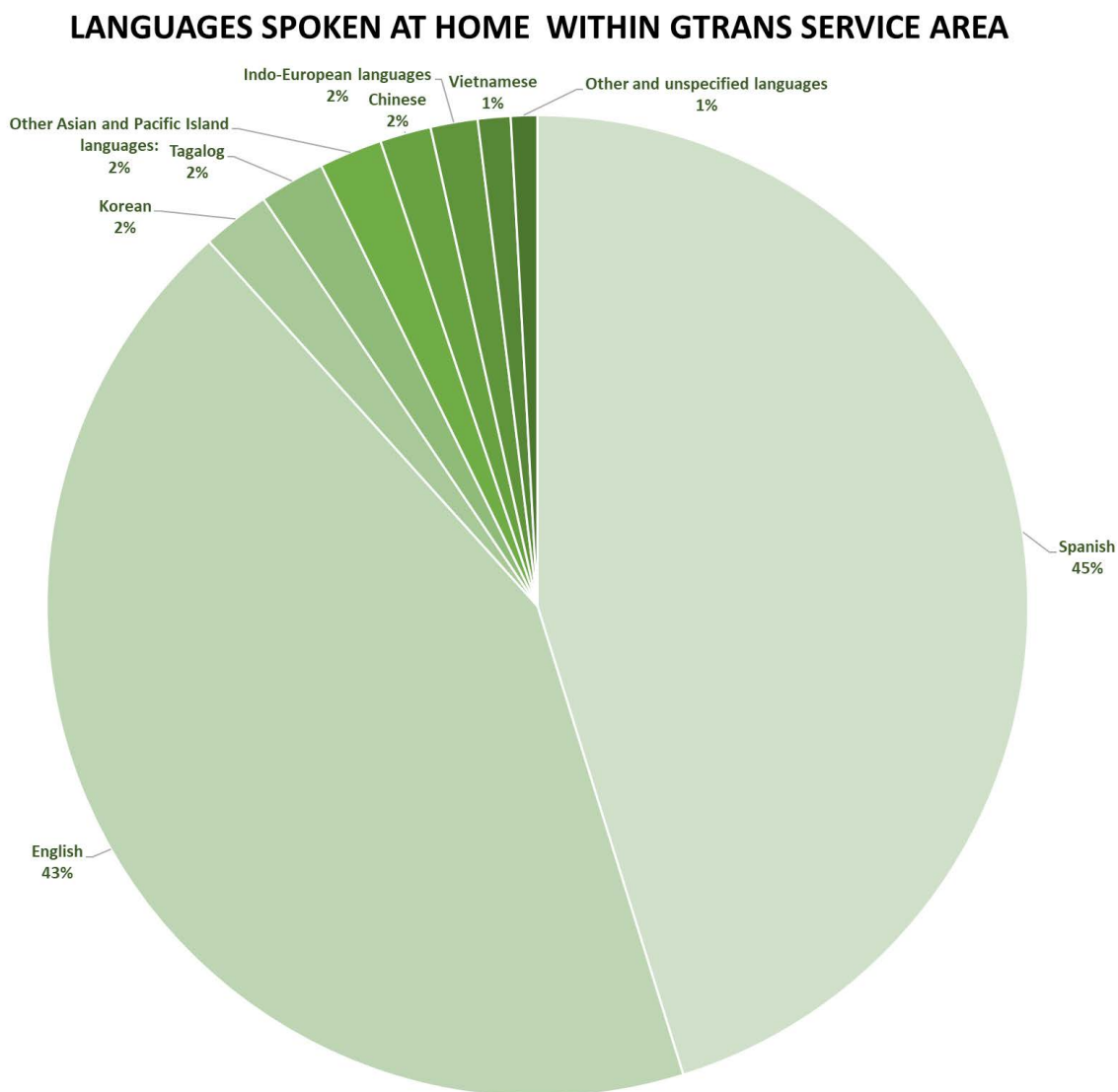
The U.S. Census Bureau compiles data through its American Community Survey (ACS), which is an ongoing statistical survey that samples a small percent of the population every year giving communities the information they need to plan investments and services. In addition to tracking race, family and relationships, income and benefits, health insurance, education, veteran status, and disabilities, it also provides numbers for areas across the United States of English proficiency. The categories provided describe levels of English proficiency as speaking English “Well,” or “Less than very well.” This data can be accessed for each of the census tracts contained within areas surrounding the GTrans service area. This data is the basis for much of the analysis that follows.

Figure 1: GTrans Route Map



The 2020 ACS showed that of the many languages spoken in the homes of those living within the GTrans service area, approximately 43 percent of the population speaks only English at home. The remaining 57 percent of the population speaks a language other than English at home: approximately 45 percent Spanish, two percent Korean, two percent Tagalog, two percent Chinese, two percent Other Asian and Pacific Island, two percent Indo-European languages, one percent Vietnamese, and one percent Other and unspecified languages. Figure 2 shows the breakdown of languages spoken at home within the GTrans service area, covering 205 census tracts.

Figure 2



SOURCE: Data Source: C16001 LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER. Universe: Population 5 years and over 2020 American Community Survey 5-year Estimates by GTrans Service Area Census Tracts

As indicated in Figure 2 above, nearly half of the respondents in GTrans' service area speak English at home (43 percent). However, there are a significant number (45 percent) of respondents who speak Spanish at home. Of the LEP population, Spanish is the most predominant language spoken by far. Second to Spanish are Korean, Tagalog, Chinese, Other Asian and Pacific Island languages, and Indo-European languages at about two percent each, and then Vietnamese and Other and unspecified languages at approximately one percent each. All other languages spoken at home by respondents in GTrans' service area make up approximately one percent of the total LEP languages spoken at home. Compared to the previous report in 2019, the Spanish language remains the highest spoken other than English within the GTrans area.

The LEP population is determined by specific categories used by respondents in the ACS. Using LEP classifications of "Very well" and "Less than very well" the number of LEP individuals can be determined. As depicted below in Figure 3 on the following page, approximately 76 percent of the population is classified as speaking English only and speaking English "Very well." The remaining 24 percent report speaking English "Less than very well." This is considered the LEP population of GTrans' service area. Approximately 76 percent of the total LEP population communicates in Spanish, which is by far the main non-English language spoken in the GTrans service area.

Figure 3

GTrans Service Area LEP Characteristics for populations 1000+		% of total	Language % of LEP
Total Population:	751,582		
Speak English only:	319,711	42.54%	
Speak Spanish	335,014		
Speak English "very well"	196,427		
Speak English less than "very well"	138,587	18.44%	76.24%
Speak Korean	16,613		
Speak English "very well"	5,574		
Speak English less than "very well"	11,039	1.47%	6.07%
Speak Chinese	12,466		
Speak English "very well"	5,785		
Speak English less than "very well"	6,681	0.89%	3.68%
Speak Tagalog	16,038		
Speak English "very well"	10,340		
Speak English less than "very well"	5,698	0.76%	3.13%
Speak Vietnamese	7,981		
Speak English "very well"	3,247		

Speak English less than "very well"	4,734	0.63%	2.60%
Arabic	3,807		
Speak English "very well"	2,443		
Speak English less than "very well"	1,364	0.18%	0.75%
Other Asian and Pacific Island languages:	15,447		
Speak English "very well"	8,001		
Speak English less than "very well"	7,446	0.99%	4.10%
Other Indo-European languages:	11,500		
Speak English "very well"	7,983		
Speak English less than "very well"	3,517	0.47%	1.93%
Other and unspecified languages:	6,461		
Speak English "very well"	5,341		
Speak English less than "very well"	1,120	0.15%	0.62%
Speaks English Only or Speaks English "Very well"	569,806	75.81%	
Speaks other Languages and English less than "Very well"	181,776	24.19%	
**Other Languages less than 1000 individuals include: French, Haitian, or Cajun, German or other West Germanic language, Russian, Polish, or other Slavic languages			
Data Source: C16001 LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER. Universe: Population 5 years and over 2020 American Community Survey 5-year Estimates			

Safe Harbor

By further exploring the ACS data, GTrans has determined that there are nine LEP language groups that are required to be analyzed. The U.S. Department of Transportation (USDOT) has adopted the U.S. Department of Justice (USDOJ) Safe Harbor Provision, which outlines circumstances that can provide a "Safe Harbor" for recipients regarding the translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent or 1,000 persons, whichever is less, of the total populations of people eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written language obligations.

The GTrans language groups that fall under the Safe Harbor provision are depicted in Figure 3 on the previous page. From the data, Spanish was the largest LEP language group for the GTrans service area with approximately 76 percent of the LEP population. Language groups which exceed 1,000 persons speaking English "Less than very well" are: Korean with approximately 11,039 members of the LEP population, Chinese with an LEP population of approximately 6,681, Tagalog with an estimated LEP population of 5,698, Vietnamese with an estimated LEP population of 4,734, and Arabic with an estimated

population of 1,364, Other Asian and Pacific Island languages with an estimated LEP population of 7,446, Other Indo-European languages with an estimated LEP population of 3,517, and Other and unspecified languages with an estimated LEP population of 1,120.

In terms of concentration, GTrans has determined that Spanish-speaking LEP populations are concentrated in Downtown Los Angeles and the GTrans' service areas around Compton, Inglewood, Lennox, Lynwood, Hawthorne, and Willowbrook, which are within the service areas of Lines 1X, 2, 5, and 7X. Korean-speaking LEP concentrations are mostly in the section of the GTrans service area that occupies Downtown Los Angeles, Gardena, Carson, and Torrance areas, which are within the service areas of Lines 1X, 2, and 3. Chinese-speaking LEP population concentration also resides in Downtown Los Angeles where Line 1X runs. Tagalog-speaking LEP populations are concentrated primarily in the GTrans service area which occupies Carson, which is within the service area of Line 2. The concentration of the Vietnamese-speaking LEP population is in the El Camino Village area, which is serviced by Line 1X and 3. Arabic-speaking concentrations of LEP populations are primarily in Hawthorne and Lawndale, which are within Line 1X and 5 service areas. The other categories all are dispersed across most of the GTrans lines: The Other Asian and Pacific Island languages are concentrated along the Torrance and Gardena areas, Other Indo-European languages are dispersed amongst the South Bay cities of Torrance, Hawthorne, Redondo Beach, and Los Angeles, and Other and unspecified languages are concentrated within the Gardena and Hawthorne areas.

Although Korean, Chinese, Tagalog, Vietnamese, Arabic, Other Asian and Pacific Island languages, Other Indo-European languages, and Other and unspecified languages LEP population are above the 1000-person threshold as defined by the DOJ Safe Harbor Provision, they all represent together approximately 23 percent of the LEP population within GTrans Service area.

The GTrans website www.ridegtrans.com has a feature provided by Google that translates the website into over 100 different languages including all of the languages which fall under the Safe Harbor Provision. Written translations for the printed material will be focused on the Spanish LEP language group, which makes up approximately 76 percent of the LEP population within GTrans service area. For more on GTrans' efforts for Safe Harbor languages and its vital documents, please see Factor 4 below.

The Federal guidance also suggests incorporating data that can be obtained through the State Department of Education, which has enrollment data on LEP populations, and the types of languages spoken in the areas throughout which GTrans provides service.

GTrans' service area encompasses eleven school districts. For the purpose of this report, not all the schools that represent Los Angeles Unified School were included in the calculation of LEP populations. Rather, just the schools located in census tracts within GTrans' service area were included, representing a total of 9,732 English learner students grades K-12. Centinela Valley Union High School District includes high schools located in Lawndale, Hawthorne, Lennox, Del Aire, and El Camino Village and has a total of 1,137 English learner students in grades 9-12. Compton Unified School District serves the city of Compton along portions of Paramount and Carson with a total of 5,455 English learner students in grades K-12. El Segundo Unified School District serves the residents of El Segundo and has a total of 102 English learner students in grades K-12. Hawthorne Unified School District serves the residents of Hawthorne and has a total of 1,822 English learner students in grades K-12. Inglewood Unified School District serves students in Inglewood and has a total of 2,099 English learner students in grades K-12. Lawndale Elementary School District serves Lawndale, parts of Hawthorne and the El Camino Village has a total of 1,353 English learner students in grades K-12. Lennox Unified School District serves K-8 students in the Lennox area and has a total of 2,314 English learner students. Redondo Beach Unified

School District which serves the areas of both Redondo Beach and Hermosa Beach has a total of 395 English learner students. Torrance Unified School District serves the city of Torrance and has a total of 2,789 English learner students grades K-12. Wiseburn Unified School District, which serves K-8 students in the Hawthorne area, has a total of 293 English learner students.

Figure 4 details the percentage of English learners enrolled at specific GTrans' service area schools in each of the eleven districts by language spoken, if greater than one percent of the total within the specific district. According to the State of California's Department of Education, English learners are those who do not speak, read, write, or understand English as a result of English not being their home language. The statistics related to LEP inevitable are in keeping with the census data, in that Spanish is by far the most common language spoken by LEP individuals.

Figure 4

English Learner Students by Languages Greater than 1% of total		
	Number of English Learner students	% of Language Spoken by English Learner Students in the School District
Centinela Valley Union High School District 2021-2022		
Spanish	1,082	95.16%
Vietnamese	15	1.32%
Other non-English languages	12	1.06%
Compton Unified School District 2021-2022		
Spanish	5,432	99.58%
El Segundo Unified School District 2021-2022		
Spanish	55	53.92%
Japanese	9	8.82%
Arabic	7	6.86%
Khmer (Cambodian)	4	3.92%
Mandarin (Putonghua)	4	3.92%
Portuguese	4	3.92%
Other non-English languages	2	1.96%
Telugu	2	1.96%
French	2	1.96%
Urdu	2	1.96%
Hawthorne Unified School District 2021-2022		
Spanish	1,667	91.49%
Arabic	39	2.14%
Inglewood Unified School District 2021-2022		
Spanish	2,000	95.28%
Other non-English languages	30	1.43%
Lawndale Elementary School District 2021-2022		
Spanish	1,203	88.91%
Vietnamese	62	4.58%

Arabic	24	1.77%
Other non-English languages	14	1.03%
Los Angeles Unified School District 2021-2022		
Spanish	9221	94.75%
Lennox Unified School District 2021-2022		
Spanish	2,297	99.27%
Redondo Beach Unified School District 2021-2022		
Spanish	174	44.05%
Japanese	50	12.66%
Russian	26	6.58%
Korean	21	5.32%
Portuguese	20	5.06%
Mandarin (Putonghua)	13	3.29%
Arabic	10	2.53%
Farsi (Persian)	9	2.28%
Turkish	9	2.28%
Vietnamese	9	2.28%
Other non-English languages	6	1.52%
Filipino (Pilipino or Tagalog)	5	1.27%
French	5	1.27%
German	4	1.01%
Urdu	4	1.01%
Torrance Unified School District 2021-2022		
Spanish	905	32.45%
Japanese	571	20.47%
Korean	310	11.12%
Arabic	144	5.16%
Mandarin (Putonghua)	103	3.69%
Vietnamese	100	3.59%
Urdu	92	3.30%
Portuguese	91	3.26%
Other non-English languages	75	2.69%
Filipino (Pilipino or Tagalog)	70	2.51%
Telugu	48	1.72%
Farsi (Persian)	35	1.25%
Russian	30	1.08%
Wiseburn School District 2021-2022		
Spanish	233	79.52%
Japanese	8	2.73%
Vietnamese	7	2.39%
Cantonese	6	2.05%

Arabic	4	1.37%
Mandarin (Putonghua)	4	1.37%
Other non-English languages	4	1.37%
Korean	3	1.02%
Amharic	3	1.02%
Hindi	3	1.02%
Urdu	3	1.02%
Data Source: English Learner Students by Language by Grade, California Department of Education. 2021-2022.		
* Information provided in Figure 4 includes only those schools located in census tracts within GTrans' service area and therefore does not represent district-wide figures. Additional languages are spoken in each district; however, they represent less than 1% of the languages spoken within each district.		

The Federal Transit Administration recommends that each agency conduct community outreach to organizations that work with LEP populations. This outreach may provide the agency with information that is not included in the Census, such as information on the specific languages spoken by the LEP populations, population trends, cultural backgrounds of LEP persons, information on what services are most frequently sought by the LEP population, and what will resonate equally among all nationalities and subcultures within the GTrans service area.

GTrans regularly works with community organizations and local groups to provide information on transit services. Although the COVID-19 pandemic limited the ability to outreach within the last few years, GTrans continued to participate in local City of Gardena and community events, where GTrans was able to interact with LEP individuals and receive feedback:

- Gardena Police Department National Night Out - A community outreach event where GTrans distributed transit information and showcased its services.
- Operation Backpack - Provided transit information to local school-aged students and parents.
- Los Angeles Southwest College DAZE Resource Fair - Shared information about GTrans and the fareless program with incoming college students.
- Back to School Night and Orientation at Animo Legacy, Peary Middle School, and Gardena High School - Shared information about GTrans and the fareless program.
- Kids at the Park - A Gardena Recreation event where GTrans shared information about its services with local parents and kids.
- Youth in Government Day - A City event where GTrans had the opportunity to share information about its careers and receive feedback from students regarding its services.
- Coffee with a Cop - A public networking opportunity for residents to ask any questions about the police department and learn about resources offered by city departments including GTrans.
- Annual Heritage Street Festival - A City of Gardena's fair held at City Hall where GTrans had the opportunity to network with a diverse group of businesses and distribute transit information.
- Nakaoka Center Senior Day - Provided seniors with information on how to ride the bus and discussed public transit safety concerns.
- Annual City of Gardena Jazz Fest - A City of Gardena festival held at Rowley Park, where GTrans provides transit information to the community.
- City of Gardena's Earth Day Event - A City celebration where GTrans shares information about its Clean Air Projects and the use of public transportation.

- Martin Luther King Jr. and Cinco de Mayo Celebrations - City events where GTrans had the opportunity to share transit information with diverse groups.
- Bring it On the Blvd Event - A local street fair where many organizations, including GTrans, passed out flyers and information regarding its resources.
- Unity Breakfast - Networking opportunity where GTrans shares information with church groups.
- Gardena Valley Baptist Church Summer Festival - Fourth of July celebration at a local church, where GTrans provided information about its services.
- New Mount Calvary's Health and Wellness Pavilion - Local resource fair where GTrans gave information about transit services.

Based on the interactions between GTrans staff and the aforementioned community groups and events, the LEP language most encountered is Spanish. Recognizing that demographics and languages are shifting all the time, GTrans will continue to work with these and other community groups to continue to gain experience and knowledge about its LEP population.

Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services

What the Guidance Says:

“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with the LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed”

GTrans recently reviewed the frequency with which staff and drivers have or could have contact with LEP persons. GTrans conducted a recent survey of bus operators and frontline staff including the front office Customer Service who handles all calls and visits, and Staff who often interact with the community and passengers. Of those surveyed, 39 percent indicated they interacted with 10 or more individuals with limited English proficiency.

Approximately 97 percent of the respondents indicated that the primary LEP language encountered was Spanish. Roughly, 70 percent of the respondents indicated that they most frequently encounter LEP customers along Line 2, which is GTrans' highest ridership line. There have only been a few requests made to the operators and frontline staff for language translation of public information, with 73 percent indicating that passengers have not requested translated materials.

Here are additional relevant activities and services provided by GTrans during which LEP contact is made:

- Fixed Route transit services on 6 routes
- In person at GTrans Customer Service Desk
- City of Gardena Phone Tree providing names, phone numbers, and languages of certified employees in the City that can assist with translation or interpretation
- Special Transit paratransit service within the City of Gardena, Hawthorne and portions of LA County
- GTrans outreach events and information booths

- Bus Operators and their Supervisory Team interact with LEP persons daily in the field
- GTrans Website with Google Translate feature which translates the website into over 100 different languages
- Schedules, brochures, and bus signage provided in English and Spanish
- GTrans social media accounts include Facebook, Instagram, and Twitter
- Outreach with local schools regarding access to services

In an effort to explore the needs of LEP communities within the GTrans service area, staff surveyed local organizations including the Gardena Valley Japanese Cultural Institute, Gardena Valley Baptist Church, Hawthorne Senior Center, Department of Public Social Services – West Athens GROW Program, One-Stop Gardena, The Church of Jesus Christ Latter-Day Saints, and El Camino College. The purpose of this dialogue was to further understand the extent of the LEP population in GTrans' services area, as well as the needs of the community. The discussions resulted in confirmation that Spanish is the largest speaking language amongst the LEP population. Other languages common within those organizations included Japanese, Chinese, and Tagalog, which represent a small sector of the overall LEP population in the GTrans service areas. From our conversations with these organizations, we learned that the seniors make up a large amount of the LEP population and prefer more traditional forms of communication like phone calls, word of mouth, and regular mail although text and email options are becoming more popular due to the ability to easily translate information that is sent online.

Factor 3: The importance to LEP Persons of Your Program, Activities, and Services

What the Guidance Says:

“The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed”

Through input from community organizations and interactions with riders, GTrans has determined its most crucial services to be its fixed route and paratransit services, which together account for over three million annual boardings pre-COVID19. Related to this service, GTrans provides vital documents, without which a person would be unable to access services. GTrans' vital documents are as follows:

Vital Documents

GTrans Route and Schedule Guide

Special Transit Information

Title VI Notice, Title VI Plan, and Complaint Procedures

Language Assistance Plan

Public Notices to Change in Service

Factor 4: The Resources Available to the Recipient and Cost

What the Guidance Says:

“A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons”

As a small transit operator, GTrans has limited resources but manages to stretch this limited budget through cost-effective and efficient measures that benefit not only GTrans' LEP customers but all customers. Currently, GTrans practices several measures in support of assisting the LEP population. These efforts include:

- There is staff within the Transportation Department and throughout the City of Gardena who are on the Bilingual List of Translators and eligible for Bilingual Bonus Pay. Eligible employees receive \$31 per pay period. Currently, GTrans 15 employees receive this compensation for a FY2022 budgeted cost of \$9,000.
- GTrans' Route and Schedule Guide is printed in both English and Spanish, providing maps and timetables in addition to offering customers important information about how to ride the bus, critical information on fares and passes, information on Special Transit, etc. There is only minimal incremental cost for this guide to include Spanish translation, as in-house staff provides the translation copy. The cost to print the guides in total is roughly \$8,000.
- GTrans' website uses Google Translate feature to support over 100 languages for immediate translation. This feature is free for GTrans to use on its website.
- GTrans' non-bilingual bus operators ask other customers on board for translation assistance when they are either unable to understand or communicate with an LEP person or are not near the GTrans' staffed customer service center. If still unable to provide assistance, GTrans operators are instructed to contact Dispatch for assistance. This is at no additional cost.
- Brochures and other materials including signage and information cards for the bus are printed in both English and Spanish. This amounts to approximately \$2,000 per year.
- Public outreach team and events are held throughout the year to provide the public, which includes the LEP population, with information and giveaways. These outreach events are already in the budget for outreach; however, the staff ensures there are Spanish-speaking employees available to assist with GTrans' Spanish-speaking customers. This additional cost is approximately \$2,000 per year.

GTrans will continue to translate its vital documents such as the Route and Schedule Guide, Special Transit Information, Title VI Notice, Title VI Plan and Complaint Procedures, Language Assistance Plan, and Public Notices to Change in Service through Google Translate on the GTrans website and certified translators when needed. GTrans will also continue to use its in-house multilingual staff, citywide Bilingual List of Translators, and Google Translate to translate for eligible LEP language groups. Finally, GTrans continues to explore the cost and feasibility of a third-party language service provider to assist our bus operators and our other front-line staff in being able to better communicate with LEP individuals in our service area. Preliminary outreach with other agencies that use these services has been helpful, as has outreach to various firms that provide such services.

Conclusion:

GTrans has developed several methods to guarantee that those who rely on public transit and are limited English speakers are able to receive critical information. The availability of the resources outlined in the four-factor analysis has greatly helped in providing critical information to GTrans' LEP population. As shown in the review of U.S. Census information, GTrans can provide services to most of its service area without any additional effort. GTrans will continue to make efforts in order to ensure that LEP individuals do not feel unable to utilize the services provided by the City.

Language Assistance Plan

Introduction

U.S. Department of Transportation (DOT) Limited English plan (LEP) guidance recommends that GTrans, as a recipient of federal funds, develop an implication plan to address the needs of the LEP population it serves. 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. This plan outlines how to identify a person who may need language assistance, the language assistive measures, training staff, providing notice to LEP persons, and monitoring and updating the LEP plan.

Element 1: Identifying LEP individuals Who Need Language Assistance

What the Guidance Says:

“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis”

As part of the four-factor analysis, GTrans’ used ACS data to determine the breakdown of LEP individuals located within its service area. This was executed using the analysis of 205 Census tracts, and approximately 816,700 residents.

The data showed some very clear trends within GTrans’ service area. Approximately 57% of the residents in the service area speak a language other than English at home. Of the total service area population, 75.8% identified themselves as speaking English only or “Very well.” This figure includes the 42.5% of those who identify themselves as speaking only English, but also the populations which speak other languages and speak English “Very well”. GTrans also determined that 24.2% of GTrans service area population can be classified as LEP, and of that population 76.2% spoke Spanish.

Spanish is the clear and overwhelming LEP language to be addressed in the GTrans’ service area. In accordance with the USDOJ’s Safe Harbor Provision, Korean, Chinese, Tagalog, Vietnamese, Arabic, Other Asian and Pacific Island languages, Other Indo-European languages, and Other and unspecified languages LEP populations are emerging in GTrans’ service area, with concentrations seen in specific areas. As indicated in Factor 1, GTrans regularly encounters LEP individuals throughout its day-to-day operations. By far the most common language group encountered by GTrans, outside of English is Spanish.

Element 2: Language Assistance Measures

What the Guidance Says:

“An effective LEP Plan would likely include information about the ways in which language assistance will be provided”

GTrans will strive to offer the following measures to LEP individuals, that is, persons who speak English “Less than very well.”

- 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 meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, GTrans will provide 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 translations, 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 on the next page.

Element 3: Training Staff

What the Guidance Says:

“Staff members should know about their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained. An effective LEP plan would likely include training to ensure that:

- ***Staff knows about LEP policies and procedures***
- ***Staff having contact with the public (or those in recipient's custody) is trained to work effectively with in person and telephone interpreters”***

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
- Process for assisting LEP customers when translation is requested
- How to handle potential Title VI/LEP complaints

Element 4: Providing Notice to LEP Persons

What the Guidance Says:

“Once an agency has decided, based in the four-factors, that it will provide language services, it is important that the recipient notify LEP persons of service es available free of charge. Recipients should provide this notice in languages LEP person would understand.”

GTrans currently provides most of its public printed material about service in both English and Spanish including the Route and Schedule Guide and bus signage. Staff members throughout GTrans, who are bilingual in English and Spanish, are available to assist customers as needed. Furthermore, the website offers a feature from Google Translate which automatically can translate the website into over 100 different languages.

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 for the known LEP population

- Bus schedules, maps, and other transit publications will be made available in an alternative language for the known LEP population through the GTrans website using the Google translate feature

Formal Interpreters

- When necessary to provide meaningful service to LEP clients, GTrans will provide qualified interpreters upon request, including any bilingual staff of the City of Gardena, if available. The City of Gardena has identified all City staff who speak languages other than English. At important stages that require one-on-one contact, written translations 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 on 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 their 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 their own informal interpreter, GTrans serves the right to also have a formal interpreter present.

Element 5: Monitoring and Updating LEP Plan

What the Guidance says:

“Evaluation can help you track your outreach efforts, discover dissemination problems early, make corrections, and find out whether your language services have impacted your ridership and/or relations with local immigrant communities”

GTrans will update the LEP Plan as required by U.S. DOT every 3 years or when significant changes are required. GTrans intends to explore additional improvements that may be developed as a result of an ongoing dialog with the LEP community and changes to the demographics of the service area.

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 a copy of the plan in translation which GTrans will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to GTrans in person at 13999 S. Western Ave., Gardena, CA 90249, through phone (310) 965-8888, or email at titlevi@gardenabus.com.



Appendix E

Gardena City Council Approval of 2022 Title VI Program



OFFICE of the CITY CLERK

1700 WEST 162nd STREET / GARDENA, CALIFORNIA 90247-3732 / WWW.CITYOFGARDENA.ORG / PHONE (310) 217-9565

CERTIFICATION OF MINUTES EXCERPT

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss:
CITY OF GARDENA)

I, **BECKY ROMERO**, Deputy City Clerk for the City of Gardena, California, do hereby certify that the following is a true and complete excerpt of the minutes of the Regular meeting of the Gardena City Council, held on September 27, 2022:

"8. CONSENT CALENDAR - TRANSPORTATION

8.N Approve City of Gardena's GTrans 2022 Title VI Program

It was moved by Council Member Henderson, seconded by Mayor Pro Tem Francis, and carried by the following roll call vote to Approve GTrans 2022 Title VI Program:

Ayes: Council Member Henderson, Mayor Pro Tem Francis, Council
Members Tanaka and Love, and Mayor Cerda
Noes: None
Absent: None"

IN WITNESS WHEREOF, I have hereunto set my hand
and affixed the Seal of the City of Gardena, this 28th day of
September 2022.

Becky Romero

BECKY ROMERO
Deputy City Clerk
City of Gardena, California



TASHA CERDA, Mayor / PAULETTE C. FRANCO, Mayor Pro Tem
MARK E. HENDERSON, Councilmember / RODNEY G. TANAKA, Councilmember / WANDA LOVE, Councilmember
MINA SEMENZA, City Clerk / GUY MATO, City Treasurer / CLINT OSORIO, City Manager / CARMEN VASQUEZ, City Attorney



Appendix F

GTrans Bus Stop Policy



GTrans Bus Stop Policy

Bus stops play an important role in service accessibility, community identity, and safety and comfort of waiting customers. The purpose of this policy is to provide guidance for the spacing of GTrans bus stops and establish criteria for the distribution of bus stop amenities.

A. Bus Stop Location and Spacing

Bus stop location will be determined by GTrans staff, and will aim to balance operating speed and convenience of service access. GTrans' goal is to have stops spaced approximately $\frac{1}{4}$ mile apart, although stops may be located more closely depending on land use. Stops may be located further apart if safety conditions do not allow a safe stop to be placed within $\frac{1}{4}$ mile of the previous stop. Where site conditions allow, GTrans aims to have far-side stops, which reduce conflict with right-turning vehicles, eliminate sight-distance deficiencies at intersection approaches, and encourage pedestrians to cross behind the bus. Additionally, far-side stops will allow GTrans to implement transit signal priority in the future, which will expedite travel across intersections.

B. Bus stop amenities

Since resources are limited, not every bus stop can have all of the desired amenities beyond just a pole and sign. GTrans is guided primarily by the following objectives:

Maximizing benefit for existing customers: amenities should be allocated to stops with the highest number of average weekday boardings, and stops that serve as transfer points at major intersections.

Equitable distribution of amenities: GTrans is committed to meeting the requirements of Title VI of the 1964 Civil Rights Act as defined in FTA circular C 4702.1. The circular states that services must be distributed in a way that minority communities receive benefits in the same proportion as the total service area.

It should be noted that because GTrans is the bus system serving and funded by the City of Gardena, stops within city limits will be prioritized for improvements. Outside of the City of Gardena, GTrans may recommend amenities at different bus stops, but ultimately each city is responsible for selecting and installing amenities in its jurisdiction. GTrans will regularly evaluate the conditions and needs of bus stops in its service area and will meet with other cities to provide them with recommendations for changes to bus stops.

With regard to amenities and their placement, GTrans will also consider the input and recommendations from its bus operators and employees, as well as customers, community, and business stakeholders.



TASHA CERDA, Mayor / PAULETTE C. FRANCIS, Mayor Pro Tem
MARK E. HENDERSON, Councilmember / RODNEY G. TANAKA, Councilmember / WANDA LOVE, Councilmember
MINA SEMENZA, City Clerk / GUY MATO, City Treasurer / CLINT OSORIO, City Manager / CARMEN VASQUEZ, City Attorney

GTrans staff has developed a classification method for bus stops that will guide the allocation of amenities by GTrans:

Tier 1 Bus Stops (100 or more daily weekday boardings):

Tier 1 bus stops are GTrans' most productive stops, and are likely located next to major trip generators (such as shopping centers, medical services, or rail stations). At a minimum, as space allows, these stops will have poles and signs, seating, and trash receptacles. Depending on existing lighting conditions, these stops will be considered for the installation of additional lighting. It is also recommended that these stops have a shelter to protect waiting customers from the elements.

Tier 2 Bus Stops (between 15 and 99 daily weekday boardings):

Tier 2 bus stops should have a sign and pole, seating, and may have a trash receptacle based on local city ordinances. Tier 2 stops may receive lighting based on existing lighting conditions. GTrans staff will monitor use of Tier 2 stops and see if stop usage increases enough for the stop to be upgraded to Tier 1. Tier 2 stops will be considered for additional amenities if they are near facilities serving seniors, disabled, medical, or social services, or if there is a key municipal facility close to the stop.

Tier 3 Bus Stops (less than 15 daily weekday boardings):

Tier 3 bus stops should have a sign and pole and may have a trash receptacle depending on local city ordinances. GTrans staff will monitor use of Tier 3 stops and if stop usage increases enough, the stop may be upgraded to a higher tier. Tier 3 stops may be considered for additional amenities if they are near facilities serving seniors, disabled, medical, or social services, or if there is a key municipal facility close to the stop.

GTrans staff will make initial recommendations based on stop-by-stop ridership counts from the 2014 line-by-line analysis. In the future, staff will rely on new line-by-line analyses and Automatic Passenger Counters, which the agency will install to generate more detailed information about customers and their travel patterns.

