

**RESOLUTION NO. 7572**

**CITY OF SOUTH GATE  
LOS ANGELES COUNTY, CALIFORNIA**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SOUTH GATE  
ADOPTING THE TRANSIT SERVICES DIVISION, TITLE VI COMPLIANCE,  
EFFECTIVE NOVEMBER 1, 2013**

**WHEREAS**, the City of South Gate ("City") has a strong commitment to promoting and supporting equal treatment and access to services within its community and by its residents; and

**WHEREAS**, to be eligible for Federal Transportation Account funds, the City must formally adopt a program in compliance with Title VI of the Civil Rights Act of 1965, and various provisions of the Federal Aid Highway Act of 1973 and the Civil Rights Restoration Act of 1987; to the end that no person in the United States shall, on the grounds of sex, race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation in accordance with Title 49, Code of Federal Regulations, Part 21; and

**WHEREAS**, staff has prepared the attached Transit Services Division, Title VI Compliance Program ("Compliance Program"), effective November 1, 2013 (attached hereto as Exhibit "A"); and

**WHEREAS**, the Compliance Program sets forth: (1) the applicable criteria and regulations, and supporting factual data, used to verify that the City's Transit Services Division's current practices are adequate to ensure equal and fair public access to its services in accordance with Title VI Regulations, and (2) a recommended program to ensure future compliance with Title VI compliance requirements.

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SOUTH GATE DOES  
HEREBY RESOLVE AS FOLLOWS:**

**SECTION 1.** The City Council hereby adopts the City's Compliance Program, effective November 1, 2013.

[Remainder of page left blank intentionally]

**SECTION 2.** The Director of Parks & Recreation is hereby authorized to submit the Compliance Program Report (Exhibit "A") as required, to the Los Angeles County Metropolitan Transit Authority (Metro).

**SECTION 3.** The Director of Parks & Recreation is hereby authorized to implement the Compliance Program.

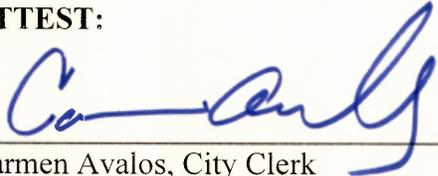
**SECTION 4.** The City Clerk shall certify to the adoption of this Resolution which shall be effective upon its adoption.

**PASSED, APPROVED and ADOPTED** this 12<sup>th</sup> day of **November, 2013.**

**CITY OF SOUTH GATE:**

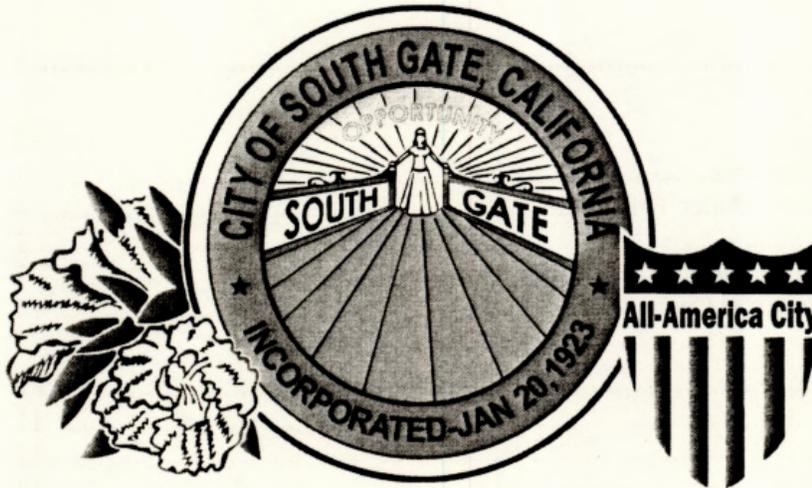
  
\_\_\_\_\_  
Gil Hurtado, Mayor

**ATTEST:**

  
\_\_\_\_\_  
Carmen Avalos, City Clerk  
(SEAL)

**APPROVED AS TO FORM:**

  
\_\_\_\_\_  
Raul F. Salinas, City Attorney



City of South Gate  
TRANSIT SERVICES DIVISION

**TITLE VI COMPLIANCE**

**TABLE OF CONTENTS**

**I Introduction .....3**

**II General Requirements**

Annual Title VI Certifications and Assurances ..... 4

Notification of Beneficiaries of Protection Under Title VI .....4

Title VI Complaint Procedure ..... 7

Recording Title VI Investigations, Complaints, and Lawsuits..... 9

Membership of Non-Elected Committees and Councils ..... 10

**III Inclusive Public Participation ..... 11**

Opportunities for Public Participation..... 11

Public Outreach Efforts ..... 11

Next Steps..... 14

**IV Language Assistance Plan..... 15**

Four Factor Analysis ..... 16

Language Assistance Measures ..... 18

Training Staff ..... 19

Providing Notice to LEP Persons ..... 19

Monitoring and Updating LEP Plan ..... 19

**V Service Policies and Standards ..... 20**

Vehicle Assignment Policy ..... 20

Vehicle Load ..... 21

Vehicle Headways ..... 21

Service availability ..... 21

Transit Amenities ..... 21

**VI Environmental Justice..... 23**

**VII Other Program Specific Requirements and Contact..... 25**

**VIII Board Adoption of Policy..... 25**

Effective November 1, 2013

## **I INTRODUCTION**

The City of South Gate Transit Division has updated its Title VI Program as required by the Federal Transit Administration (FTA) and to further ensure that the level and quality of South Gate Transit's fixed route and demand-response services are provided pursuant to Title VI of the Civil Rights Act of 1964. That is:

*"No person in the United States shall, on the grounds of race, color, 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." (42 U.S.C. 2000d)*

The City of South Gate Transit Division, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations in all City of South Gate Transit Division programs and activities. The City of South Gate Transit Division provides, without regard to race, color, national origin, sex, age, disability or income level:

1. Transit services and benefits that are available and equitably distributed;
2. A level and quality of transit services that are sufficient to provide equal access and mobility for all persons;
3. Opportunities to participate in the transit planning and decision making processes; and,
4. Fair decisions on the location of transit services and facilities.

These objectives are the basis for the City of South Gate Transit Division's Title VI program. The program that follows was updated in conformance with FTA C 4702.1B (October 1, 2012). The new guidance in this circular integrates the responsibilities to Limited English Proficient (LEP) Persons into the programs and activities developed under the Title VI regulations (49 CFR Part 21) to recipients of federal financial assistance.

This program contains all of the elements required of a transit provider operating in an urbanized area of 200,000 or less in population and operating less than fifty vehicles in peak service. It is City of South Gate Transit Division's first Title VI Program and is effective as of November 1, 2013. It has been prepared using data from the most recent 2010 U.S. Census.

Effective November 1, 2013

## II GENERAL REQUIREMENTS

### 1. Annual Title VI Certifications and Assurances

The City of South Gate Transit Division will submit its annual Certifications and Assurances to the Federal Transit Administration each year in accordance with the requirement to do so within 90 days from the date of the publication of the notice in the Federal Register or with the first grant application, whichever comes first. The 2014 submittal will be South Gate's first required submittal.

### 2. Notification of Beneficiaries of Protection Under Title VI

In compliance with 49 CFR Section 12.9 (d), the City of South Gate Transit Division has provided information to the public regarding its Title VI obligations and appries members of the public of the protection against discrimination afforded to them by Title VI on an on-going basis. This statement of nondiscrimination on the basis of race, color, national origin, sex, age, disability, ethnic group, or sexual orientation has been made available on the Transit Division's website, on bus cards in all Transit Division vehicles, in Title VI brochures, and on all printed route guides and schedules. The notice also includes contact information for requesting details on the Transit Division's Title VI obligations and the complaint procedure. The notice is in English and Spanish. The dissemination of these notifications began with the effective date of this policy.

TITLE VI BUS SIGN (installed in all vehicles)



### City of South Gate Transportation Division NOTICE OF CIVIL RIGHTS

The City of South Gate Transportation Division (City) operates its programs and services without regards to race, color or national origin in accordance with Title VI of the Civil Rights Act. In addition to Title VI the City also prohibits discrimination based on sex, age, disability, ethnic group, or sexual orientation. Any person who believes that he or she has been aggrieved by any unlawful discriminatory practice may file a complaint with the City. For more information on the City's civil rights program and the procedures to file a complaint, please contact the City using the information listed below.

---

La División de Transportación de la Ciudad de South Gate (Ciudad) maneja sus programas y servicios sin considerar la raza, color u orígenes nacionales de la persona en acuerdo con el Título VI del Acta de los Derechos Civiles. Adicionalmente con el Título VI la Ciudad también prohíbe discriminación basado en el sexo, edad, incapacidades, grupo étnico, u orientación sexual. Cualquier persona que crea que ha sido agredido por cualquier discriminación ilegal puede poner una queja con la Ciudad. Para más información del programa de la Ciudad sobre los derechos civiles y el proceso para hacer una queja, por favor comuníquese con la Ciudad a la información proveia adjunto.

---

<b>Phone / Teléfono:</b> (323) 563-5774	<b>Mail / Correo:</b> City Clerk's Office
<b>E-Mail:</b> <a href="mailto:cavalos@sogate.org">cavalos@sogate.org</a>	8650 California Avenue
	South Gate, 90280

C

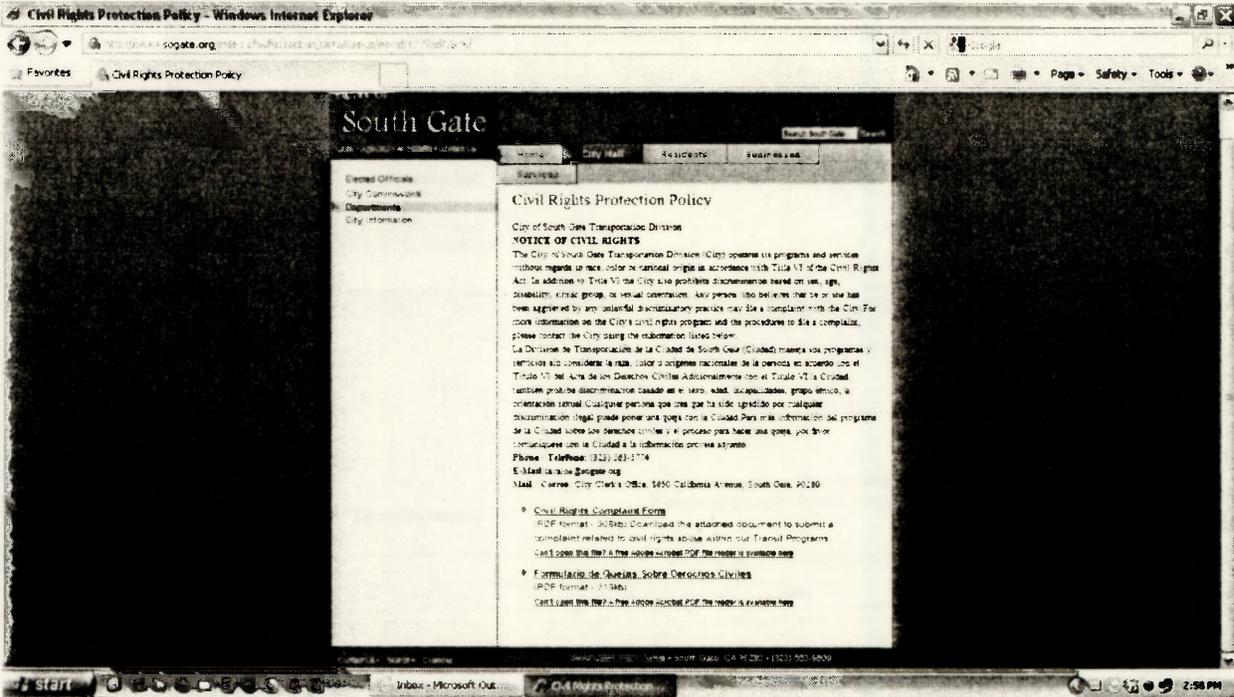
80



City of South Gate  
TRANSIT SERVICES DIVISION  
**TITLE VI UPDATE**

Effective November 1, 2013

TITLE VI POLICY ON WEBSITE



BYRON WESTON  
XEROGRAPHIC  
LINEN RECORD-2007

### 3. Title VI Complaint Procedure

In order to comply with 49 CFR Section 21.9 (b), the following complaint procedure will be followed by the City of South Gate Transit Division in the event that any person believes that he or she, individually, or as a member of any specific class of persons, has been excluded from participation in, been denied the benefits of, or been subjected to discrimination on the basis of race, color, national origin, sex, age, disability or income level with regard to:

- the availability and equitable distribution of transit services and benefits;
- the level and quality of transit services that are sufficient to provide equal access and mobility for all persons;
- the opportunity to participate in the transit planning and decision making processes; and
- the right to fair decisions on the location of transit services and facilities.

The complaint will be made in writing to the City of South Gate through the City Clerk's Office and will include all information relevant to a determination of discrimination. A complaint must be filed within six (6) months after the alleged discrimination. In cases where the complainant is unable or incapable of providing a written statement, the City Clerk's staff will, if necessary, assist the person in converting verbal complaints to writing and will interview the complainant. The complainant or his/her representative will sign all complaints.

All complaints will be logged by the City Clerk and forwarded to the Transit Divisions Civil Rights Officer, (currently the Transit Services Superintendent). After review of the complaint, which will include, but not be limited to, interviewing the complainant, witnesses and all appropriate Transit Division personnel, review of video or audio recordings if available, review of Transit Division policies and service standards, the Civil Rights Officer will make a determination of discrimination. If it is found that discrimination did not occur, the complainant will be notified in writing and the procedure will be terminated. Notification will occur within ten (10) days of the original submission of the complaint. At that time the complainant will be advised of their right to challenge the decision of the Civil Rights Officer by submitting a written request for a hearing before the City Manager within five (5) days of the receipt of the determination.

If after the Civil Rights Officer's review of the complaint, it is found that discrimination may have occurred, a formal hearing will be held before the City Manager. The claimant will be notified of this determination within ten (10) days of the submission of the complaint. The hearing will occur within five (5) days and will be attended by the City Manager, the Civil Rights Officer, the complainant and the appropriate Transit Division personnel. Following the hearing the City Manager will make a final determination. The complainant will be notified of this determination in writing within ten (10) days of the hearing. If justified, appropriate remedial action will be taken. The City Manager's decision will be considered final.

The following two (2) documents are the complaint forms – in English and Spanish.

City of South Gate  
**TRANSIT SERVICES DIVISION**  
**TITLE VI UPDATE**

Effective November 1, 2013



City of South Gate  
 1900 SOUTHERN AVENUE - SOUTH GATE, CA 90280  
 (323) 563-5443 FAX: (323) 564-4632  
 www.cityofsouthgate.org

**Civil Rights Complaint Form**

Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require that 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 subjected to discrimination under any program or activity receiving federal financial assistance. The City of South Gate also prohibits discrimination based on sex, age, disability, ethnic group, or sexual orientation.

In addition to utilizing the Civil Rights complaint process with the City of South Gate, a Complainant may file a Title VI complaint concerning race, color or national origin discrimination with the Federal Transit Administration (FTA), Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839. A Complainant may file an Americans with Disabilities Act (ADA) complaint with the FTA, Director, FTA Office of Civil Rights, East Building - 5th Floor, TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Complainants may also contact the FTA ADA Assistance Line, 1-800-877-8339 (Voice) or through the Federal Information Relay Service, 1-800-877-8339 or by electronic mail at [FTA.ADAAssistance@dot.gov](mailto:FTA.ADAAssistance@dot.gov). The FTA ADA Complaint form is available at [http://www.fta.dot.gov/civilrights/12875\\_14816.html](http://www.fta.dot.gov/civilrights/12875_14816.html).

The following information is necessary to assist us in processing your complaint. Should you require assistance, please let us know.

Complete and return this form to: City of South Gate, City Clerk's Office, 3650 California Avenue, South Gate, CA 90280

1. Complainant's Name: \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
4. Telephone Number (home): \_\_\_\_\_ (business): \_\_\_\_\_
5. Person discriminated against (if someone other than the Complainant):  
 Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

5. Which of the following best describes the reason you believe the discrimination took place? Was it because of your: \_\_\_\_\_

- a. Race     b. Color     c. National Origin   
 d. Sex     e. Age     f. Disability   
 g. Sexual Orientation

7. What date did the alleged discrimination take place? \_\_\_\_\_
8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use additional sheets if more space is required.  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes:  No:

If yes, check each box that applies:

- Federal agency     Federal court     State agency   
 State court     Local agency

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature \_\_\_\_\_ Date \_\_\_\_\_

For information in another language please call (323) 563-9510 or go to [www.sogate.org](http://www.sogate.org). Spanish version of previous sentence.



City of South Gate  
 1900 SOUTHERN AVENUE - SOUTH GATE, CA 90280  
 (323) 563-5443 FAX: (323) 564-4632  
 www.cityofsouthgate.org

**Civil Rights Complaint Form**

El Título VI de la Acta de Derechos Civiles de 1964 (Title VI of the 1964 Civil Rights Act) u otros estatutos y regulaciones referente a la no discriminación, requieren que ninguna persona sea excluida de participar o ser negada beneficios a servicios, o ser discriminado bajo cualquier programa o actividad que recibe asistencia financiera federal basado sobre su sexo, edad, incapacidad, grupo étnico o orientación sexual.

Además de utilizar el proceso de quejas de Derechos Civiles de la Ciudad de South Gate, un querrelante puede poner un queja Título VI (Title VI) referente a raza, color de piel, u origen nacional con la Administración Federal de Transito (Federal Transit Administration (FTA)), Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, CA 94105-1839. El querrelante puede poner un queja con la organización de Acta de Americanos con Incapacidades (ADA), dirigiéndose al FTA Director, FTA Office of Civil Rights, East Building- 5th Floor, TCR, 1200 New Jersey Avenue SE, Washington DC 20590. Querrelantes pueden dirigirse a la línea de asistencia, (FTA ADA Assistance Line), 888-446-4511, para los que tienen problemas con audición, puedan llamar al Federal Information Relay Service, 800-877-8339, o por correo electrónico a [FTA.ADAAssistance@dot.gov](mailto:FTA.ADAAssistance@dot.gov). El Formulario de Queja FTA ADA, está disponible en la página web: [http://www.fta.dot.gov/civilrights/12875\\_14816.html](http://www.fta.dot.gov/civilrights/12875_14816.html).

La siguiente información es necesaria para asistirle en el procedimiento de su queja. Dejenos saber si necesita ayuda.

Llene y regrese este formulario a: City of South Gate, City Clerk's Office, 3650 California Avenue, South Gate, CA 90280

1. Nombre del Querrelante: \_\_\_\_\_
2. Domicilio: \_\_\_\_\_
3. Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zona Postal: \_\_\_\_\_
4. Telefono (Casa): \_\_\_\_\_ (Negocio): \_\_\_\_\_
5. Información del la persona discriminada (Si es alguien más que el querrelante):  
 Nombre: \_\_\_\_\_  
 Domicilio: \_\_\_\_\_  
 Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zona Postal: \_\_\_\_\_

- a. Raza     b. Color de Piel     c. Origen Nacional   
 d. Sexo     e. Edad     f. Incapacidad   
 g. Orientación Sexual

7. ¿Cual fue la fecha del presunto acto de discriminación?? \_\_\_\_\_
8. En tus propias palabras, describe el presunto acto de discriminación. Explica que paso y quien usted piensa fue responsable. Por favor use hojas adicionales si requiera mas espacio.  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

9. ¿Has presentado documentación de esta queja con cualquier otra agencia federal, estatal, o local; o con una corte federal o estatal?? Si:  No:

Si contestaste si, marca las casetillas que apliquen:

- Agencia Federal     Corte Federal     Agencia Estatal   
 Corte Estatal     Agencia Local

10. Por favor provee la información sobre una persona para contactar en la agencia/corte adonde fue presentada la queja.

Nombre: \_\_\_\_\_  
 Domicilio: \_\_\_\_\_  
 Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Zona Postal: \_\_\_\_\_

11. Por favor firme abajo. Usted puede agregar cualquier material por escrito o información que usted piense sea pertinente a su queja.

Firma del Querrelante \_\_\_\_\_ Fecha \_\_\_\_\_

Effective November 1, 2013

If the Administrator finds that discrimination did not occur, the complainant will be notified of that disposition and will advise the complainant of their right to submit their complaint to the Federal Transit Administration for further investigation.

Complaint forms are available in both English and Spanish on the City of South Gate Transit Division website. The forms are also available at the City of South Gate Transit Division office upon request. The general complaint procedure is available on both the website and in the Title VI brochures, both in English and Spanish. The detailed complaint procedure noted above will be made available to members of the public upon request. Provision will be made for persons with limited English proficiency.

#### 4. Recording Title VI Investigations, Complaints, and Lawsuits

In order to comply with 49 CFR Section 12.9 (b) the City of South Gate Transit Division will prepare and maintain a list of any active investigations conducted by the Transit Division or any other entities other than the FTA, lawsuits, or complaints naming the City of South Gate Transit Division and/or its subcontractor(s) that allege discrimination on the basis of race, color, or national origin.

This list will include:

- the date the investigation, lawsuit, or complaint was filed;
- a summary of the allegation(s);
- the status of the investigation, lawsuit, or complaint; and
- actions taken by the Transit Division or subcontractor in response to the investigation, lawsuit, or complaint.



### **III INCLUSIVE PUBLIC PARTICIPATION**

The City of South Gate Transit Division's public participation strategy offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. Engagement of the public in service planning and development is at the forefront of a responsive operation.

The Transit Division's ongoing public participation planning ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health and their ability to participate in life supporting activities;
- The public's contribution will influence the Transit Division's decision making;
- The concerns of all persons and groups participating in the process will be considered in the decision-making process; and
- South Gate Transit will seek out and facilitate the involvement of those potentially impacted.

The City of South Gate Transit Division uses a variety of communication mechanisms to ensure that all populations, those residing in minority census tracts and those living in non-minority census tracts, persons with low-income, persons with disabilities, and persons with limited English proficiency have an opportunity to participate in service development and changes.

#### **Meeting and Information Access Accommodations**

The City of South Gate covers only 7.5 square miles and is well covered with public transportation options. Most Transit Services hearings and decisions take place at regularly scheduled City Council meetings which take place in South Gate City Hall. This facility serves well for providing public access as it is centrally located to all parts of the City and is served by several bus lines. These facilities are fully ADA accessible and include translation and audio visual equipment to assist with LEP populations.

For public outreach meetings, used to communicate possible program changes and to receive public feedback, additional public facilities are used including the City's Westside Resource Center, Hollydale Resource Center and the Margaret Travis Senior Center. These facilities are well distributed throughout the City to provide easy walking distance to one of the facilities for every resident. Once again, these facilities being publicly owned and operated through the City's Parks & Recreation Department are ADA accessible and have strong community recognition.

The City also maintains good relationships with many of our local organizations and practices a "go to them" outreach policy sending transit staff out to attend meetings of local organizations to bring transit updates and receive feedback from any location where interested residents may gather. These include many independent community groups that meet in city operated facilities, but also groups who may meet in school facilities, local churches and occasionally, private homes.

Effective November 1, 2013

## **Opportunities for Public Participation**

### Service and Fare Changes

Although the City of South Gate Transit Division does not anticipate making any service changes in the immediate future, the following are examples of when the public participation plan will be put in place:

- A new or revised fare is introduced or the method of collecting fares is changed
- A new route is introduced or a reconfiguration of an existing route is proposed
- A route is proposed for elimination
- The frequency of service is modified or the days and hours of service are proposed to be changed

All of the above instances would result in the full public participation process. Minor adjustments to a schedule or route would be posted thirty days in advance of any change.

Fares have not changed since the service was instituted in June of 2010. In the event that a fare change was proposed, steps similar to the ones outlined below would be used:

#### - One month prior to hearing date

- Notice of the intent to change fares listed on City website (English/Spanish)
- Notice of Public Hearing as Posters in English/Spanish on all vehicles
- Notice of Public Hearing as Posters in English/Spanish in all City facilities
- Distribution of Notice to all groups and individuals in stakeholder database

#### - 15 days prior to Hearing Date

- Legal notice in newspaper
- Email Blast through PIO Media Center

#### - 1 week prior to Hearing Date

- City Council Agenda is posted on City Website and at various City facilities in compliance with the Brown Act. Proposed rate change is listed under Public Hearings section.

#### - Public Hearing

- Held at City Hall as part of a regular City Council meeting, Spanish translation provided
- City Hall is centrally located in a city of only 7.5 square miles and is within one block of stops for both the City's GATE bus and the County's METRO bus system.

### Transit Enhancements

Effective November 1, 2013

The opportunity for the public participation plan to be activated would occur when improvements are being considered that would support the delivery of services. Examples would include:

- Installation of bus stop benches and shelters
- Changes to vehicles or operating equipment
- Establishing new policies for use of services

Public input would be sought in a manner appropriate to the nature of the changes and their potential impacts. Public outreach through the various methods indicated would be used to notify the public of the Transit Division's intent. If warranted, public input meetings would be held and, if needed, an advisory committee formed to gather and evaluate information and input. Surveys may also be conducted, either on-board or at drop-in locations.

### **Public Outreach Efforts**

Depending on the type of service change that is contemplated a variety of means are employed to encourage public participation. The measures taken are targeted to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations, persons with disabilities and persons with limited English proficiency from effectively participating in the Transit Division's decision making process.

The potential for a change/enhancement to service/fares is a result of carefully evaluated data by appropriate South Gate Transit staff and our contracted service provider. The data collection will not only include ridership and financial analysis but recaps of community conversations and recommendations with targeted groups or organizations. A proposal is then developed internally and presented to the City Manager or South Gate City Council, depending on the extent and nature of the proposed changes. Once the proposal is accepted, the proposal will proceed to the public comment period.

Public outreach meeting locations, dates and times will be determined with consideration of the proposed changes and their impact on specific locations/populations within the South Gate Transit service area. The following will be considered in establishing those locations:

- Convenience and accessibility for minority, persons with disabilities and LEP communities;
- Size of venue should provide for meaningful dialogue; and
- Invite community organizations to help support public engagement strategies.

As many communication opportunities as possible should be used to seek public input. Methods will include:

- notices on buses in both English and Spanish;
- handouts to passengers (English and Spanish);
- legal ads in newspapers;

Effective November 1, 2013

- news stories in City publications;
- notices on the website (English and Spanish);
- distribution of notices to advocates for various special interest groups followed by meetings when appropriate and at convenient and accessible locations for different populations (i.e: South Gate Senior Center, Hollydale Senior Housing, Human Services Association – Westside Service Center, South Gate Adult School);
- providing handouts at public meetings; and,
- Spanish speaking employees at meetings available to translate for persons with limited English proficiency.

Once the public comment period ends, all comments will be consolidated and then a careful evaluation of all comments will be considered. A final recommendation will be made to the City Council for their final decision.

Significant public outreach was conducted as part of a transit services needs assessment beginning in 2006 which lead to the eventual development of the fixed route service which began operations in July of 2010. Over the past three years, the City has conducted public outreach in the following ways:

- Public comments and complaints are received regularly at our Transit Division office. The Transit Division office's location and phone number are well publicized.
- Comment forms are provided on all buses.
- Twice per year Transit Staff holds an outreach at our Senior Center providing information about our transit programs and soliciting comments and feedback.
- This past year, the Transit Services agreements with our service providers expired. Public hearings were held as part of our regular City Council meetings both in authorizing the scope of work requested as well as two hearing to award contract. All meetings were published and advertised as indicated above.

#### **Next Steps**

Although the City of South Gate Transit Division's public participation plan will be consistently applied, it is recognized that on-going public participation would benefit the organization. Transit staff will actively seek to engage our community in interpreting and promoting our transit services and programs. These efforts will include the following:

- Regular updates on Transit Division programs and offerings posted to the City website in English and Spanish
- Information regarding our transit programs mailed to each household quarterly as part of our City's recreation brochure (English and Spanish)

City of South Gate  
TRANSIT SERVICES DIVISION  
**TITLE VI UPDATE**

---

Effective November 1, 2013

- Regular communications with and annual presentations to various stakeholder groups including:
  - South Gate Senior Center,
  - Hollydale Senior Housing,
  - Human Services Association – Westside Service Center,
  - South Gate Adult School
- Maintain a database of program users, participants and other interested parties to facilitate contacting these individuals when issues require input.

Effective November 1, 2013

#### **IV LANGUAGE ASSISTANCE PLAN**

##### *Improving Access for People with Limited English Proficiency (LEP)*

The City of South Gate Transit Division's Language Assistance Plan incorporates all reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of the Transit Division's programs and activities for LEP individuals. Limited English Proficient (LEP) persons refer to:

*Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.*

The plan has the following key elements:

- Identification of LEP individuals who need language assistance in the South Gate Transit Division service area (using the four factor analysis that follows);
- Determination of the appropriate language assistance measures based on what is learned;
- Training of all employees regarding LEP policies and procedures;
- Providing notification to LEP persons of the language services offered by the South Gate Transit Division; and,
- Procedures to monitor and update the Language Assistance Plan.

As a first step, and in order to ensure meaningful access to programs and activities, South Gate Transit uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps South Gate Transit to determine if it communicates effectively with LEP persons and supports language access planning.

This Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by South Gate Transit;
2. The frequency with which LEP persons come into contact with South Gate Transit services and programs;
3. The nature and importance of South Gate Transit services and programs in people's lives; and,
4. The resources available to South Gate Transit for LEP outreach, as well as the costs associated with that outreach.

**1. Four Factor Analysis**

Factor 1 The number or proportion of LEP persons eligible to be served or likely to be encountered by South Gate Transit

CENSUS DATA - The first step in this process is to understand the proportion of LEP persons who may encounter any of the services provided by South Gate Transit, their literacy skills in English and their native language, the location of their communities and neighborhoods, and if they are underserved as a result of a language or other socio-economic barrier. Data for the review will include U.S. Census Bureau "American Fact Finder" 2011 data.

The City of South Gate Transit Division operates local fixed-route services in South Gate. Regional transit services are provided by Los Angeles Metropolitan Transit Authority. Americans with Disabilities Act transit services are provided to qualifying South Gate seniors and disabled through the South Gate Transit Divisions Phone a Ride program. The South Gate Transit Services Division's area of service is clearly defined by the boundaries and residents of the City of South Gate.

The City of South Gate and its surrounding communities are predominately Hispanic with a high number of Spanish speaking residents as well as a lower than average education level in much of the population. According to the 2010 census, South Gate has 94.8% of its residents identifying themselves as Hispanic. Of those, a total of 44.3% identified themselves as speaking English less than "very well".

<b>LANGUAGE SPOKEN AT HOME</b>				
<b>Population 5 years and over</b>	86,558	+/-549	86,558	(X)
English only	9,457	+/-1,055	10.9%	+/-1.2
Language other than English	77,101	+/-1,238	89.1%	+/-1.2
<b>Speak English less than "very well"</b>	38,311	+/-1,276	44.3%	+/-1.4
<b>Spanish</b>	76,066	+/-1,243	87.9%	+/-1.2
<b>Speak English less than "very well"</b>	38,016	+/-1,256	43.9%	+/-1.4
Other Indo-European languages	364	+/-214	0.4%	+/-0.2
<b>Speak English less than "very well"</b>	41	+/-42	0.0%	+/-0.1
Asian and Pacific Islander languages	653	+/-285	0.8%	+/-0.3
<b>Speak English less than "very well"</b>	251	+/-119	0.3%	+/-0.1
Other languages	18	+/-31	0.0%	+/-0.1
<b>Speak English less than "very well"</b>	3	+/-10	0.0%	+/-0.1

In addition, the City does not assume literacy with residents, particularly in the English language. According to the 2010 census 32.8% of South Gate residents above the age of 25 have a 9<sup>th</sup> grade education or less. This, combined with the high level of Spanish speaking residents leads to a high number of residents who are do not easily read or write English.

City of South Gate  
TRANSIT SERVICES DIVISION  
**TITLE VI UPDATE**

Effective November 1, 2013

EDUCATIONAL ATTAINMENT				
Population 25 years and over	53,813	+/-806	53,813	(X)
<b>Less than 9th grade</b>	<b>17,640</b>	<b>+/-1,029</b>	<b>32.8%</b>	<b>+/-1.8</b>
9th to 12th grade, no diploma	8,699	+/-625	16.2%	+/-1.2
High school graduate (includes equivalency)	13,936	+/-923	25.9%	+/-1.6
Some college, no degree	7,492	+/-690	13.9%	+/-1.2
Associate's degree	2,474	+/-349	4.6%	+/-0.6
Bachelor's degree	2,764	+/-414	5.1%	+/-0.8
Graduate or professional degree	808	+/-195	1.5%	+/-0.4

RELATIONSHIP TO SERVICE AREA – Due to the high density and small area (less than 7.5 sq mi) of South Gate, there are few distinct geographic areas which define specific populations or higher concentrations of Limited English Proficiency populations. All parts of the city contain significant numbers of LEP populations and require staff who are bilingual in both English and Spanish and who are trained and sensitive to the needs to those who may have limited reading and writing skills in either language or both.

Factor 2 FREQUENCY OF CONTACT WITH LEP INDIVIDUALS – As is illustrated by the demographic information above, only two languages; English and Spanish, are spoken with any frequency by South Gate residents. All Transit Division office personnel as well as our contractor's dispatchers and drivers are required to be bilingual in Spanish and English.

City staff and staff provided by our contractor were polled to see if any other languages had been encountered during the three years of operation of our bus system. Only two incidents were indicated. Both of these involved individuals who primarily spoke an Asian language. In both cases the individuals spoke some English and staff was able to communicate through English and hand gestures.

To ensure continued collection of contacts, staff is required to report any contacts with LEP customers speaking any language besides Spanish. Staff will be asked to identify the language, if known, provide details of the information requested and the methods used to resolve the problem. This policy will be reinforced regularly as part of ongoing staff training.

Factor 3 IMPORTANCE OF THIS PROGRAM TO OUR COMMUNITY – The City of South Gate is a lower income community with an average per capita income level below County, State and Federal averages. According to the 2010 Census, 20% of South Gates residents are at or below poverty levels. Over 11% of South Gate's working population use some method besides a personal vehicle to get to work. Many of those who do drive leave remaining family members without transportation to accomplish their daily tasks.

South Gate is well served by Metro bus routes, criss-crossing the City on major arterials and providing access to other nearby communities. The City's GATE program provides service on the neighborhood level, accessing smaller streets and important local destinations. Based upon driver estimates, shopping is

Effective November 1, 2013

the most common use followed closely by school and work. Stops at important local destinations such as City Hall and South Gate Park provide access to important government services provided at these facilities. A new stop at our local adult school site is quickly becoming a popular destination.

**RESOURCES AVAILABLE TO OUR RECIPIENTS AND ASSOCIATED COSTS** - The South Gate Transit Division has always committed resources to improve access to its services and programs for LEP persons. The Spanish speaking population has a significant presence in the service area, therefore it has been important to offer materials in a format that are easily understood by this identified population.

These have included:

- Spanish outreach materials (public notices, service explanations)
- English/Spanish on-board signage (how to use services, fares)
- English/Spanish brochures (i.e. farebox use, know your rights)
- Spanish route and time guides
- Spanish representation at public meetings
- A majority of staff are bilingual

The costs associated with this customer service are part of the on-going budget for marketing. These language services are seen as a normal part of business by most of the City's departments and are an expected cost and service required in order to properly serve our community.

## **2. Language Assistance Measures**

The South Gate Transit Division has reviewed all of the data and conclusions that have been drawn as a result of the Four Factor Analysis. The written and oral assistance products and methods that are currently in place for the Spanish speaking LEP population appear to be meeting our current populations needs; however, continued monitoring of the changing community needs along with ongoing training of staff along with regular feedback from both the community and staff will be required to ensure that this program continues to address the needs of all of our LEP residents.

Ongoing monitoring efforts:

- Continue to monitor LEP public contacts and reinforce with staff to report any non-Spanish contacts.
- Include Language issues as part of annual customer survey.
- Maintain contact with other local social service organizations and City Departments to identify changing language needs within our population.
- Hold public outreach meetings twice per year.

Program Enhancements and Goals:

- Look into translation services which may be available by telephone or electronically.
- Continued efforts to provide all written documents in both English and Spanish.
- Provide more pictographic communication tools and signage for those who do not read.

Effective November 1, 2013

### **3. Training Staff**

Training is an on-going activity. A reaffirmation of the entire Title VI policy will be issued annually. All Transit Division employees and all employees provided by our Contracted Transit Provider must have a good understanding of this program, its importance and their role in its implementation. The implementation of our LEP program will be part of our normal customer service training. As such, the following steps will be taken:

- Customer Service/Language Assistance will be a standing agenda item at regular Staff Meetings.
- Input from this committee will lead to specific training with drivers.
- Road supervisor daily observations of drivers and their passenger interactions will note any language encounters.
- Refresher training will be provided immediately with drivers when they are observed lacking sensitivity or responding inappropriately to persons with limited English proficiency.
- All drivers and customer service employees will be bilingual in English and Spanish
- Providing translation resources to drivers and staff to receive access to translation services when needed by phone or radio.
- Providing training on language translation technology as it becomes available.

### **4. Providing Notice to LEP Persons**

As was stated previously, LEP persons will be notified of the language services available through the South Gate Transit Division by the following means:

- On-board posters and posters at bus shelters
- Posting signs at the Transit Services Office and other key service points
- Website posting
- Notice on schedules
- Notice in the Quarterly Recreation Guide, Transit Services Section

Such notices will be in Spanish and, as possible, pictographic.

### **5. Monitoring and Updating the LEP Plan**

The South Gate Transit Division's LEP plan will continue as an active planning tool. As such, tools for feedback and data collection have been put in place as outlined above. The plan will be reviewed annually using the data and feedback received. Minor adjustments will be made at the staff level to insure that the program continues to function in an effective, responsive manner. Larger changes to the program, when identified, will be put through the public outreach process and shall be approved by the City Council.

**V. Service Policies and Standards**

The City of South Gate Transit Division has established the following policies and standards as guidelines to assure the equitable distribution of services and the accessibility of the fixed-route services.

**Vehicle Assignment Policy**

The City of South Gate vehicles are assigned to routes in a manner to provide the maximum amount of seating capacity for passenger's usage. Demographics for all routes are comparable; therefore, a policy for minority riders is not necessary at this time.

Both City vehicles are the same age and model; therefore, there is no visual or measureable difference between the vehicles. The following criterion is used for assigning vehicles:

- Vehicles with larger seat capacity will be assigned to routes with higher ridership needs.
- Vehicles may be assigned on a rotating basis between routes that operate more or less miles; this will ensure that all vehicles maintain an equal amount of miles during the same period. This is a preventive maintenance measure; however, ridership requirements supercede this policy and vehicles with more seat capacity will be assigned for passenger's needs.

**Summary**

Vehicles are assigned to meet the needs of customers and may be reassigned if customers riding patterns change. The basic principle in assigning vehicles is to serve the greater number of passengers during peak and non-peak-hours, likewise, this concept supports our safety standards by always assigning the appropriate vehicle into service.

**Vehicle Load**

**Average Passenger Capacities**

Vehicle Type	Seated	Standing	Total	Load Standard	Maximum Load Factor
28 Foot Bus	20	14	34	1.7	1.7

**AM Peak (7 – 8 a.m.)**

Vehicle Type	Seated	Standing	Total	Load Standard	Maximum Load Factor
28 Foot Bus	20	14	34	1.7	1.7

**PM Peak (4 – 5 p.m.)**

Vehicle Type	Seated	Standing	Total	Load Standard	Maximum Load Factor
28 Foot Bus	20	14	34	1.7	1.7

### **Vehicle Headways**

The City of South Gate utilizes two vehicles on the same route; traveling in the same direction. On-time performance is measured by having all routes start at the same 6:00 a.m. starting time, and then the vehicles maintain the same headways of approximately 20 minutes apart from each other. The vehicles are using the concept of a free-running time loop during the entire day. This means vehicles have a definite start time at the first bus stop of the day and an end time at the last bus stop of the day. However, the vehicles do not maintain time points between bus stops for the entire day of service. Vehicles simply keep running without stopping until the end of the day.

Once a vehicle completes a trip the bus driver boards waiting customers and immediately begins the next trip without delay. In this way, we are able to provide more trips than maintaining the traditional schedule that may have lag or break time built into the schedule.

The 20 minute headways are maintained during peak and non-peak periods; likewise, 20 minute headways are maintained Monday to Saturday.

### **Service availability**

The City of South Gate vehicles are assigned to routes in a manner consistent with providing a fair and even distribution of service to all residents. Demographics for all routes are comparable; therefore, a policy for minority riders is not necessary at this time. Our current routes provide access to 95% of our residents within a ½ mile walk.

### **Transit Amenities**

The City of South Gate transit amenities policy is to ensure equitable distribution of safety, comfort and convenience items across the entire fixed route system without prejudice. All riders have equal access to these aforementioned amenities.

Definition of transit amenities:

- Sitting – Benches will be installed at various locations along the routes where it is legal and permitted in consistency with the city's standards and practices regulations. Benches are installed in a fair and even distribution manner to serve all community members wishing to utilize the service.
- Bus shelters – Shelters will be installed along the routes in a manner consistent with the needs of the community's safety, comfort and convenience. These locations are identified by our Public Works Department, Street Division with the assistance of the City's Traffic Engineer. Requests from the public and comments received during public input process are considered in these determinations.
- Provision of information: printed signs, system maps, and schedules – This information is distributed to the public with the intent to market and promote the city fixed route system. The information is intended to educate the community as to the availability of the service and therefore is

City of South Gate  
TRANSIT SERVICES DIVISION  
**TITLE VI UPDATE**

---

Effective November 1, 2013

made available in various formats. Electronic versions of the material are distributed via the city website, through e-mail blasts, electronic billboard in the Swim Stadium and on the Friends-of-South-Gate Facebook page. Hard copy versions of the information are available to all members of the community and are distributed on buses, at the city Transit Office, at City Hall, at the Parks and Recreation department administration office, on the quarterly recreation brochure, and on the city newsletter.

Effective November 1, 2013

## **VI ENVIRONMENTAL JUSTICE**

### **Introduction**

The City of South Gate Transit Division, as a recipient of federal assistance, must abide by nondiscrimination policies as expressed in Title VI of the Civil Rights Act of 1964. These requirements were further enhanced by Presidential Executive Order No. 12898 issued February 11, 1994. This order directed all recipients of federal assistance to incorporate environmental justice as part of their mission by identifying and addressing the effects of all programs, policies and activities on minority and low-income populations. The Transit Division will use the following fundamental principles when planning new services or revising existing services; when operating and administrative policies are reviewed; and, when construction of fixed facilities are contemplated or are in progress:

1. Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process;
2. Prevent the denial of, reduction in or significant delay in the receipt of benefits by minority and low-income populations; and,
3. Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.

In accordance with U. S. Department of Transportation's Order to Address Environmental Justice in Minority and Low-Income Populations, all services, policies and projects must be analyzed to determine whether there would be a "disproportionately high and adverse effect on minority and low-income populations". For the effect to be determined as "disproportionately high and adverse" it must be borne or will be suffered by a minority or low-income population appreciably more or greater in magnitude than would be suffered by the non-minority or non-low-income population.

### **Incorporating Environmental Justice into Planning**

Although Environmental Justice practices are incorporated into the overall commitment of the City of South Gate Transit Division to provide transit service and its benefits equitably, specific steps will be followed by the Transit Division when conducting a service change, planning study or construction project. The major steps in the process will include:

- Identification of the study area;
- Compilation of population characteristics and identification of locations with populations of concern for environmental justice;
- Conducting public outreach;
- Identifying adverse effects on populations of concern; and,
- Evaluating the project's overall effects.

Effective November 1, 2013

#### Fixed-Facility/Construction Projects

Construction projects possess unique issues that may be of particular importance to low income and minority populations and should be considered as part of the assessment:

- Human health and quality of life effects related to construction and construction truck traffic off-site;
- Continued availability of community facilities, services and open space;
- Preservation/enhancement of community character and cohesion;
- Direct and indirect residential and business displacements arising from secondary development or change in community character; and,
- Economic vitality and job opportunities.

The public participation plan in Section III details the process followed by the Transit Division to afford opportunity for inclusion by all impacted groups and stakeholders. City of South Gate Transit Division will follow federal guidance provided in FTA Circular 4703.1 (August 2012).

**VII OTHER PROGRAM SPECIFIC REQUIREMENTS**

**Subrecipient Compliance**

During this report period, the City of South Gate Transit Division did not have any subrecipients. Language requiring compliance with all Federal requirements, including Title VI, is included in the contract language for all contractors working under this program and is monitored by the City.

**Equity Analysis for Facility**

During the past three years, the City of South Gate Transit Division has not constructed a vehicle storage, operations or maintenance facility.

**Demographic Service Profile**

City of South Gate Transit Division operates fewer than 50 vehicles in peak fixed-route service; therefore a demographic profile was not prepared for this plan update.

**CONTACT**

For additional information on the City of South Gate Transit Division's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Paul L. Adams, Director of Parks & Recreation  
City of South Gate Transit Division  
4900 Southern Avenue  
South Gate, CA 90280  
323-563-5478  
E-Mail: padams@sogate.org

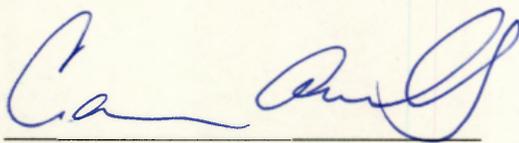
**RESOLUTION CERTIFICATION PAGE**

**STATE OF CALIFORNIA** )  
**COUNTY OF LOS ANGELES** ) **SS**  
**CITY OF SOUTH GATE** )

I, Carmen Avalos, City Clerk of the City of South Gate, California, hereby certify that the whole number of Members of the City Council of said City is five; that Resolution No. 7572 was adopted by the City Council at their Regular Meeting held on November 12, 2013, by the following vote:

Ayes: Council Members: Hurtado, Gonzalez, Morales, Davila and De Witt  
Noes: Council Members: None  
Absent: Council Members: None  
Abstain: Council Members: None

Witness my hand and the seal of said City on November 19, 2013.



Carmen Avalos, City Clerk  
City of South Gate, California