



City of Baldwin Park

Transit Program

Non-Discrimination Guide

TITLE VI PROGRAM

BALDWIN PARK TRANSIT



Adopted: June 20, 2016

Department of Public Works
14403 E. Pacific Ave.
Baldwin Park, CA 91706

Dept. (626) 813-5255
Fax. (626) 962-2625

www.BaldwinPark.com



Healthy Urban Bus (HUB)



**BALDWIN PARK TRANSIT
TITLE VI PROGRAM**

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BALDWIN PARK TRANSIT TITLE VI PROGRAM

INTRODUCTION

The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that the City of Baldwin Park's transit services are in compliance with FTA Title VI requirements.

Title VI 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." The FTA is required to ensure that federally supported transit services and related benefits are provided consistent with Title VI. The Title VI Report requires an update every three years and the latest update was approved by City Council on June 20, 2016 at its regular City Council Public Meeting.

The City of Baldwin Park will ensure that its programs, policies, and activities comply with Department of Transportation's (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 CFR 74087, December 14, 2005). The City is committed to creating and maintaining a public transportation system that is free of all forms of discrimination. The City will take necessary preventive corrective and disciplinary actions to stem behavior that violates this policy or the rights and privileges it is designed to protect. FTA requires recipients to document compliance with DOT Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years.

Since the inception of our transit program in the mid 1990's, we have kept lines of communication open between the transit services contractor, patrons, and City Staff managing the Program. Full access is provided to patrons to contact the contractor and/or City Staff to relay service complaints ranging from on time performance issues; missed pick-ups, discrimination claims and other complaints. Since the mid 1990's our transit program has not received any Title VI related complaints claiming instances of discrimination based on race, color, or national origin.

References: FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (October 1, 2012).

TITLE VI REQUIREMENTS

- 1. Requirement to Notify Beneficiaries of Protection under Title VI.** In order to comply with 49 CFR, Section 21.9(d), the City shall provide information to the public regarding the City's obligations under DOT's Title VI regulations and inform the public of the protections against discrimination afforded to them by Title VI.

The City of Baldwin Park informs members of the public of their Title VI protection rights by posting a bilingual notice in busses, on the City's web site, and in public areas of City buildings. **Exhibit A**

includes a copy of the notice and the locations where it is posted. The City also provides a bilingual complaint form (see **Exhibit B**). Mandarin Chinese translations is also part of **Exhibit B**.

2. **Requirement to Develop Title VI Complaint Procedures and Complaint Form.** The City is required to develop procedures for investigating and tracking Title VI complaints filed against the City and to make these procedures for filing a complaint available to the general public.

City of Baldwin Park Title VI Complaint Procedures:

- Submission of Complaint

*If a customer believes he/she has received discriminatory treatment by the City of Baldwin Park transit system on the basis of race, color or national origin, the customer has the right to file a complaint with the Transit Title VI Compliance Coordinator. The complaint should be filed within sixty (60) calendar days of the alleged discriminatory incident. Title VI complaint procedures included in **Exhibit B** are in both English and Spanish (Note: Procedures & Complaint documents translated into Mandarin languages will be made available upon request). New census data will be reviewed for changes that would show the need for translating for additional languages.*

- Investigation of Complaints

Upon receipt of the complaint, the Compliance Coordinator will begin an investigation. The investigation may include discussion(s) of the complaint with all affected parties. Based upon the information received from witnesses and available on-board recording devices, the Compliance Coordinator will prepare an investigation report for submittal to the Public Works Director. The complainant will receive a letter from the Compliance Coordinator or designee stating the final decision within forty-five (45) calendar days of receipt of the complaint.

If more time is needed to review the complaint, the Compliance Coordinator will notify the complainant of the estimated time-frame for completing the review. Upon completion of the review, the Compliance Coordinator shall make a recommendation regarding the merit of the complaint, whether remedial actions are available to provide redress, and whether improvements to the City's Title VI process are needed.

- Request for Reconsideration

The complainant shall be notified of his/her right to appeal the decision. If the complainant disagrees with the Compliance Coordinator's finding, the complainant may request reconsideration by submitting a written request to the Public Works Director within ten (10) calendar days after receipt of the Compliance Coordinator's response. The Public Works Director will notify the complainant of his/her decision either to accept or reject the request for reconsideration within ten (10) calendar days. When the Public Works Director agrees to reconsider the matter, the complaint shall be returned to the Compliance Coordinator for re-evaluation in accordance with the "Investigation of Complaint" procedures described above.

- Appeal Process

If the request for reconsideration is denied, the complainant may appeal the Public Works Director's response by submitting a written request to the Compliance Coordinator. The appeal request will be forwarded to the Chief Executive Officer (CEO) and City Attorney for final determination.

- Submission of Complaint to the Department of Transportation

If the complainant is dissatisfied with the City's resolution of the complaint, he or she may submit a complaint to the Department of Transportation for investigation. In accordance with Chapter 9,

Complaints, of FTA Circular 4702.1B, such a complaint must be filed within 180 calendar days after the date of the alleged discrimination. Chapter 9 of FTA Circular 4702.1B, may be obtained by requesting a copy from the City's Compliance Coordinator at (626) 813-5255.

- 3. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits.** The City is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part.

The City of Baldwin Park Title VI Transit Compliance Coordinator will maintain a list of Title VI investigations, complaints, and lawsuits utilizing the form shown in Exhibit D, including a comprehensive summary and description of actions taken by the City, as required by the Title VI regulations. The list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken by the City in response, or final findings related to the investigation, lawsuit, or complaint. The list shall be included in the City's Title VI submittal to FTA every three years.

- 4. Promoting Inclusive Public Participation.** The City is required to develop a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts.

*The City's Public Participation Plan is reflected in the "City of Baldwin Park Transit Services Title VI Limited English Proficiency (LEP) Plan" under "Outreach Techniques." The City's public participation activities, public meetings, and participation in community activities are described in the LEP Plan. City staff also participates in the development and updates to the "Public Participation Plan" and coordinates and integrates its outreach efforts with MTA as **Exhibit E**.*

- 5. Requirement to Provide Meaningful Access to LEP Persons.** Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP. The City also must have a language assistance plan for providing language assistance to persons with limited English proficiency (LEP). *The City's Language Assistance Plan is reflected in the City's LEP Plan and includes language assistance measures. The City's approach includes a number of options available to LEP persons, including both oral and written language services. Specific details are included in the City's LEP Plan in **Exhibit D**.*

The City of Baldwin Park web site posts Healthy Urban Bus (HUB) schedules. The City's web site provides material in both English and Spanish. The City also provides easy access to bilingual (English and Spanish) administrative staff at the City's Public Works office (City Hall, 2nd floor) during Monday thru Thursday from 7:30 AM to 6:00 PM to answer questions for those LEP passengers who utilize the City's bus system.

The City also collaborates with the Los Angeles County Metropolitan Transportation Authority (MTA), and Foothill Transit. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with MTA's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Los Angeles County.

- 6. Requirement to Provide Additional Information upon Request.** At the discretion of the FTA, information other than that required by the referenced circular, may be requested in writing from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements.

The City of Baldwin Park Title VI Transit Compliance Coordinator will be available to provide additional information, as needed, and to respond to any verbal or written complaint.

- 7. Requirement to Develop System-Wide Standards and Policies.** FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment.

*The City has developed service standards and policies for its fixed-route system, HUB, consistent with Title VI requirements. The standards are included in **Exhibit F** and include (a) Vehicle Load: Ratio of Passengers to seats in a vehicle; (b) Vehicle Headway; (c) on-time performance; and (d) service interruptions*

- 8. Determination of Location of Facility –**

In June 2013 the City completed the construction of the Baldwin Park Transit Center/ Parking Structure for the benefit of the community and Metrolink train commuters. The structure was constructed over the City's former visitor and employee parking lot and a small portion was built on the neighboring Frontier (formally the Verizon parking lot). The purchase and acquisition of the lot did not cause any displacement of residents nor did it affect Frontier's operations. As result a social economic analysis was not included in the environmental impact report (EIR). As part of the City changes transit services and facilities, social and economic affects will be factored in the environmental impact documents.

**EXHIBIT A
NOTICE TO THE PUBLIC AND LIST OF LOCATIONS**



**CITY OF BALDWIN PARK
Baldwin Park Transit - HUB
Title VI Notice & Complaint Process**

The City of Baldwin Park 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 Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with the City within 60 calendar days from the date of the alleged discrimination.

Complaints may be filed with the City in writing and may be addressed to:

Mr. David Lopez
Title VI Compliance Coordinator

City of Baldwin Park 14403 E. Pacific Avenue Baldwin Park, CA 91706. A copy of the Title VI Complaint Form (in English or Spanish) and additional information may be obtained from the City's web site at "www.BaldwinPark.com" (under "Departments – Public Works) or by calling (626) 815-5255. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

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CIUDAD DE BALDWIN PARK
Título VI Noticia y Proceso de Quejas

La Ciudad de Baldwin Park, se compromete a garantizar que ninguna persona sea excluida de participar o denegar los beneficios de servicios basado por raza, color, linaje u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que él o ella ha sido objeto de discriminación en virtud del Título VI basado por raza, color u origen nacional puede presentar una queja del Título VI con la Ciudad dentro de 60 días del calendario a partir de la fecha de la supuesta discriminación.

Las quejas pueden ser presentadas en la Ciudad por escrito y pueden ser dirigidas a:

David Lopez

Coordinador de Conformidad del programa de Título VI

Ciudad de Baldwin Park 14403 E. Pacific Ave Baldwin Park, CA 91706. Una copia del Título VI Formulario de Queja (en Inglés o Español) y la información adicional se puede obtener desde el sitio web de la Ciudad www.cityofbaldwinpark.com (en el “Departamento de Obras Publicas) o llamando al (626) 815-5255. La Ciudad proveerá asistencia apropiada para los denunciante que sean limitados en su capacidad de comunicarse en inglés.

CITY OF BALDWIN PARK

**TITLE VI
LIST OF LOCATIONS**

The following is a list of locations where transit-related bilingual Title VI Public Notices are posted:

City of Baldwin Park
Department of Public Works
14403 E. Pacific Ave.
Baldwin Park, CA 91706

- City of Baldwin Park Web-Site (www.BaldwinPark.com)
- City of Baldwin Park, City Hall
- City of Baldwin Park Senior Center
- City of Baldwin Park Community Center
- City of Baldwin Park Transit Center Parking Structure
- City of Baldwin Park, Library
- City of Baldwin Park, Post Office
- City Owned Fixed Route Transit and Dial-A-Ride buses

**EXHIBIT B
CITY OF BALDWIN PARK
BALDWIN PARK TRANSIT
Title VI Complaint Form**

The City of Baldwin Park 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 Title VI of the Civil Rights Act of 1964, as amended. Submit complaints with 60 calendar 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 Title VI Compliance Coordinator at (626) 813-5255. The completed form must be returned to City of Baldwin Park, Title VI Compliance Coordinator, 14403 East Pacific, Baldwin Park, CA 91706.

Name: _____

Street Address: _____

Phone: _____ Alternative Phone: _____

Date of Incident: _____ Time of Incident: _____

Which of the following best describes the reason for the alleged discrimination? (Check one)

_____ Race

_____ Color

_____ National Origin (Limited English Proficiency)

Please describe the alleged discrimination incident. Explain what happened, whom you believe was responsible, and other specific relevant information. Please use the reverse side of this form if additional space is required.

(Complete next page of form)

**CITY OF BALDWIN PARK
BALDWIN PARK TRANSIT**

Title VI Complaint Form

Have you filed a complaint with any other federal, state or local agencies (Check one)

_____ Yes

_____ No

If yes, list agency or agencies and contact information below:

Agency 1: _____

Street Address: _____

Phone: _____

Contact Name: _____

Agency 2: _____

Street Address: _____

Phone: _____

Contact Name: _____

I affirm that I have read the above charge, and it is true to the best of my knowledge.

Complainant's Signature

Date

Print or Type Name of Complainant

Date Received: _____

Received By: _____

**CITY OF BALDWIN PARK
BALDWIN PARK TRANSIT
Formulario de Quejas sobre Título VI**

La Ciudad de Baldwin Park centra sus esfuerzos en garantizar que nadie sea excluido de la participación en sus servicios ni que nieguen los beneficios de estos, con base en raza, color o origen nacional, en conformidad con las disposiciones del Título VI de la Ley de Derechos Civiles de 1964 y enmiendas. Presente quejas de la discriminación presunta entre 60 días de la fecha en que ocurrió.

La información siguiente es necesaria para ayudarnos en el procesamiento de su queja. Si requiere ayuda para llenar este formulario, por favor de dirigirse al Título VI Coordinador de Cumplimiento, al teléfono (626) 813-5255. El formulario completo debe devolverse al Coordinador de Cumplimiento del Programa de Título VI, Departamento de Obras Públicas, 14403 E. Pacific Ave., Baldwin Park, CA 91706.

Nombre: _____

Dirección: _____

Teléfono: _____ Segundo Teléfono: _____

Fecha del incidente: _____ Hora del incidente: _____

¿Cuál de los siguientes describe mejor la razón por la supuesta discriminación? (Marque Uno)

_____ Raza

_____ Color

_____ Origen nacional

Por favor, describa el supuesto incidente de discriminación. Explique lo sucedido; quien considera que fue responsable; y otra información específica pertinente. (Por favor, use el reverso de este formulario si requiere espacio adicional.)

(Llene la página siguiente de este formulario)

**CIUDAD DE BALDWIN PARK
BALDWIN PARK TRANSIT
Formulario de Quejas sobre Titulo VI**

¿Ha presentado alguna queja ante otra agencia federal, estatal o local con respecto a este incidente? (Marque Uno)

_____ Si _____ No

Si la respuesta es afirmativa, por favor, a continuación enumere la agencia o agencias y la información de contacto:

Agencia 1: _____

Dirección: _____

Teléfono: _____

Nombre de contacto: _____

Agencia 2: _____

Dirección: _____

Teléfono: _____

Nombre de contacto: _____

Confirmando que he leído el cargo que se indica arriba y que es verdadero hasta donde tengo conocimiento.

Firma del declarante

Fecha

Imprima o escriba el nombre del declarante

Fecha de recepción: _____

Recibido por: _____

**EXHIBIT C
CITY OF BALDWIN PARK
LIST OF TRANSIT-RELATED TITLE VI
INVESTIGATIONS, COMPLAINTS AND LAWSUITS**

Action	Date (Month, Day, Year)	Summary (basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1	April 14, 2016	No basis for race complaint. The disagreement was over a seat preference between passengers.	closed	Contacted the complainant, bus company, and senior center manager.
Lawsuits (None)				
Complaints				
1	April 12, 2016	race	closed	none

EXHIBIT D

City of Baldwin Park LIMITED ENGLISH PROFICIENCY (LEP) AND LANGUAGE ASSISTANCE PLAN

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the City of Baldwin Park Transit Division's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated May 13, 2007, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled "Improving Access to services for Persons with Limited English Proficiency", indicated that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies which receive federal funds.

Background

The City of Baldwin Park, Public Works Department administers the Baldwin Park, Transit Services that are operated by a contract service provider. The current transit service provider is Southland Transit, Inc. The City Council is the policymaking body for the system. Transit services consist of a Fixed Route (MB) service and a Dial-a-Ride service (DR). The Transit Division has developed this LEP Plan to identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access the transit services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available.

In order to prepare this plan, HUB transit staff undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the transit programs, activities, or services.
2. The frequency with which LEP persons come in contact with the transit services programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by the HUB transit services to the LEP population.
4. Resources available to the Transit Division and overall cost to provide LEP assistance.

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

Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter HUB transit programs, activities, or services.

The transit services staff reviewed the 2010 U.S. Census and determined that, out of a population of City of Baldwin Park 71,499 residents, 59,272 (82.9%) of City of Baldwin Park residents speak a language other than English. In the City of Baldwin Park 26,000 residents (37.8%) have limited English proficiency; that is, they speak English less than “very well” or “not at all”. In the City of Baldwin Park, of those persons with limited English proficiency, the majority speak Spanish (21,434) Recently Vietnamese fell below the 1,000 person threshold and Tegolog is with in the 267 margin of error; therefore staff will be keeping a close eye on the this population trend for the benefit of our Safe Harbor provision and will concentrate efforts translations, language assistance programs in Spanish, Mandarin. See attached 2010 Census data query printout (updated: June 7, 2017) (**Exhibit H**).

2. The frequency with which LEP come in contact with transit services programs, activities, or services.

All transit services are provided through-out the City. A high percentage of Hispanic/Latino individuals therefore come into contact with the program, which is consistent 2010 Census data.

Although consistent with 2010 census data, a planned 2017 survey, to be conducted by STI bus drivers and City Staff, will provide more accurate data to further substantiate estimates and that data will be shared with LAC Metro annually through our NTD reporting program.

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

The largest geographic concentration of LEP individuals in the transit services area is Spanish-speaking. Spot surveys throughout 2013 conducted by City Staff estimate that about 65 percent are dependent transit riders, and 25 percent could have made their transit trip by another means (personal vehicle, bicycle, electric scooter, walking, etc.). The key trip purposes indicated for trips were 50 percent for shopping; 10 percent for medical/dental; 20 percent for school; 15 percent for work; and 5 percent for other purposes.

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

HUB staff has access to a variety of resources that can help in outreaching and providing LEP assistance at low or no cost. Most of City Staff is also bilingual and can provide LEP population assistance. Baldwin Park’s current Community-based resources and assistance include:

- City of Baldwin Park, Senior Center – English translation, oral interpretation qualified staff that can assist. Certain documents are also translated into Spanish, and mandarin Chinese.
- City of Baldwin Park, Community Center – Classes in multiple languages
- City of Baldwin Park, City Hall – Oral translations and document translations, related to transit.
- Los Angeles County MTA (MTA) – Call center multi-language verbal translation
- Los Angeles County Social Services Department – Call center multi-language verbal translation
- Access Services – Call center multi-language verbal translation
- Foothill Transit – Call center multi-language verbal translation

Bilingual Staff- are tested by independent company for there language(s) proficiency, because they are compensated for being able to being their knowledge base to benefit the City.

The above community resources will be used on a regular basis to assist in identifying needs of the City's LEP population. They will also serve as a means to widely disseminate bilingual transit service information and announcements and to notify the LEP population of planned workshops and outreach efforts.

Based on the four-factor analysis, the City of Baldwin Park will develop its LEP Plan as outlined in the following section.

Identification of LEP Population

The Transit Division has developed several possible ways to assist in identifying LEP populations within the City:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to City of Baldwin Park - sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. At City of Baldwin Park City meetings with senior and disabled users, develop identification cards that indicate their program subsidy qualification, as appropriate. This will assist the City in identifying language assistance needs for future events and were they be engages will be doing.
4. Survey our transit contract vehicle operators and other front-line staff, like dispatchers, Dial-A-Ride schedulers, and service development planners on their experience concerning any contacts with LEP persons. City Staff will perform survey within 14 months of Title VI approval by our City Council.
5. Network with local human services organizations (such as Social Services and Public Health) to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about Baldwin Park's transit services.
6. Network with local faith based and community based organizations (such as Social Services and Public Health) to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination transit services information.

Much of these efforts have already taken place and remaining efforts will be accomplished throughout each year and documented by City transit staff.

Language Assistance Plan Measures

There are plans for a number of language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which City of Baldwin Park City Staff can respond to LEP persons, whether in person, by telephone, e-mail, City web-page, Citizen Request Management (CRM) web-based system or in writing. The following are efforts in which we include LEP persons in this program:

- Placement of statements in notices and publications that interpreter services are available for these meetings. For example, at our City Council meeting residents can request translation and a translator will directly translate meeting topics via wireless head sets.
- Survey bus drivers and other front-line staff, like dispatchers, Dial-A-Ride schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.
- Post the Baldwin Park Transit Services Title VI Policy and LEP plan on the City of Baldwin Park website, www.BaldwinPark.com, City-owned and Transit services contractor buses, and at City owned facilities that experience public use in English, Spanish and mandarin Chinese.
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers. Unofficially we currently provide City Hall staff members that are versed in translating in Tegolog (Pilipino), Mandarin and Cantonese (Chinese) to aid in over the public counter translation services when staff is available or by appointment. LAP services may be required for these LEP persons, in the future, as our Pacific Islander and Asian populations grow.
- Web-Based translators – With the advent of web-based translators like Google Translate, assisting people with LEP has become much easier and convenient to most anyone in need of translation assistance. For example, at our Public Works counter we use two computers and Staff uses them to not only issue permits, but also to perform translations.

Assurances

The City of Baldwin Park transit services will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. Further, the City will notify the public of protections against discrimination afforded them by Title VI Regulations and will take preventive corrective and disciplinary action necessary to stem behavior that violates the rights and privileges the regulations are designed to protect. Currently, the City does not have an elected or non-elected Transportation Committee or Transit Council, but if one were to form it would be in conformance of Title VI and incorporated in this plan.

The City will post information on its web site and ensure that it reflects up to date information consistent with the requirements of 49 CFR Section 21.9(d) and FTA Circular 4702.1B

Monitoring and Updating the LEP Plan

The City of Baldwin Park will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated every three years when the Title VI program is due and supplemented with data from future U.S Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City of Baldwin Park transit services area. Updates will include the following:

- Documentation of LEP personal contacts.
- How the needs of LEP persons have been addressed.

- How Staff will be trained to interact with LEP individuals and provide LEP individuals with assistance.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether City of Baldwin Park transit financial resources are sufficient to fund language assistance resources needed.
- Determine whether City of Baldwin Park has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Baldwin Park transit services' failure to meet the needs of LEP individuals.

As part of regular and on-going training for Baldwin Park's transit, trainers at a minimum of one training or information sessions per month will focus on diversity, inclusive practices and language. Training sessions will use, when reasonable, evidence based training and researched relative information and topics to present. Staff will be monitored on topics taught and they will be assessed and discussed during annual employee evaluations. Thru our Harassment avoidance training staff will also be trained for correcting any discrimination behavior whether intentional or unintentional. Staff coming in contact with LEP individuals at the service centers are trained to interact with LEP individuals offering available translation opportunities within the organization or at least using technology like "Google Translate" or other translation technology.

Availability of Title VI Plans and Procedures

The City of Baldwin Park LEP Plan and the Title VI Procedures are included in the City of Baldwin Park's website at www.BaldwinPark.com. Any person or agency with internet access will be able to access and download the plan from the City of Baldwin Park website. For residents that do not have access to the internet, work stations are available for public use at our LAC Library and limited access at our Community and Senior Centers so that they may access the Plan. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, e-mail or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the Plan in translation, which the City of Baldwin Park will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the City of Baldwin Park Transportation Division, Title VI Administrator:

City of Baldwin Park Public Works Department 14403 East Pacific Avenue Baldwin Park, CA 91706	Phone: (626) 813-5255 Fax: (626) 962-2625 E-mail: Dlopez@BaldwinPark.com Web-Site: www.BaldwinPark.com
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EXHIBIT E

City of Baldwin Park PUBLIC PARTICIPATION PLAN (PPP)

Key Principles:

Baldwin Park Transit Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in Baldwin Park Transit service planning and development process. It 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;
- The public's contribution can and will influence Baldwin Park Transit program decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- Baldwin Park Transit will seek out and facilitate the involvement of those potentially affected.

Through an open public process, Baldwin Park Transit staff have developed a PPP to encourage and guide public involvement efforts and enhance access to Baldwin Park Transit Travel Training service decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that Baldwin Park Transit uses to reach its participants.

Limited English Proficient (LEP)

LEP refers 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.

Early, Continuous and Meaningful:

The steps outlined in the PPP offer early (in the planning process), continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed program decisions at Baldwin Park Transit. It is a guide for how Baldwin Park Transit engages it's ever changing diverse Community. Baldwin Park Transit may continue to improve its public participation methods over time based on feedback from all of its participants and community members including low-income, minority, and LEP populations, as well as customer and community-based organizations.

Goals of the Public Participation Plan

The overarching goals of Baldwin Park Transit PPP, which will be presented for public review in June 20, 2016, include:

- **Clear Lines of Influence-** The process clearly identifies and communicates where and how participants can have influence and direct impact on decision-making.
- **Diversity-** Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents limited English Proficiency
- **Accessibility-** Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **Participant Satisfaction-** People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- **Partnerships-** Baldwin Park Transit develops and maintains partnerships with community groups (i.e. BPRAC, Bike SGV, etc.)

Described in its public participation plan.

Objectives of the PPP:

Baldwin Park Transit will use its PPP when considering curriculum changes, service hours, and to provide feedback to LAC Metro on challenges presented on bus routes while providing travel training services.

Regional Partnership/Capital Programming:

Baldwin Park Transit will continue to outreach to regional partner like Metro, MSRC/AQMD, Foothill Transit, SCRRA and others to replace or upgrade our buses, Baldwin Park Transit Center and other transit amenities.

Baldwin Park Transit Public Participation Process

Outreach Efforts- Alerting Potential Participants and Encouraging Engagement:

Baldwin Park Transit program is excited to reach out to our riding community and invite their participation into programs services. Noting the diversity of the San Gabriel Valley, and our commitment to inclusion, we have developed outreach initiatives using various platforms, languages, visuals, and tools. As the Baldwin Park Transit program advances, we may adapt and enhance these methods to better reach participants and expand our messaging and methods, which to date include:

- Press releases to local newspapers including English, Spanish, and Mandarin;
- Program announcement brochure;
- Direct Mail of brochure to non-profit agencies serving special needs population;
- Website page on the Baldwin Park Transit program found on www.baldwinpark.com;
- Social Media announcements on Baldwin Park Transit using Facebook and Twitter;
- E-blast announcements of program;
- Placement of flyers in City transit buses;
- Participation in community expos to share brochure and talk with people regarding or about

- Baldwin Park Transit;
- Placement of flyers in community centers.

Public Meetings

When considering a program change, Baldwin Park Transit program will:

- Publicize or promote proposed changes and public meetings to the public using the methods listed in Section *Outreach Efforts- Alerting Potential Participants and Encouraging Engagement* (Page 21);
- Schedule meetings at times and locations that are convenient and accessible for minority, low-income, and LEP communities;
- Employ different meeting sizes and formats, including town hall, social media, and community based;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Host meetings in locations that are ADA complaint and accessible to people with disabilities;
- Consider newspaper ads and local media as well as podcasts that serve LEP populations;
- Utilize press release, mailers or e-blasts to announce public meetings, specifically identifying the time, place, and meeting topic(s);
- All materials, program opportunities, and program policies will be discussed at meetings, as to create an inclusive and transparent program for community members and program participants;
- Materials sent out will be translated into Spanish, Mandarin; or other languages will be translated upon request or based on need; or a translator will be available, if requested and where feasible;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments;
- Once public meeting is held, there will be a weeklong "comment period" (7 days), where community members can submit feedback on the meetings topic(s);
- Once complete, the Baldwin Park Transit team will analyze and summarize all program feedback and present it to the Baldwin Park Transit task force for decision making;
- Vital program policies and procedures will be available on Baldwin Park's website, City Clerk's office and at the Public Works counter
- Transit program website landing page;
- Additional policies and procedures will be available upon request to community members or program participants.

Baldwin Park Transit Mediums (Bi-lingual)

- Print- Newspapers and other periodicals
- Outdoor- Advertising on-board buses (interior and exterior) and in bus shelters kiosks
- Email: BPreceptionist.com is established to provide feedback from users
- Social Media- Baldwin Park will be on Facebook and Twitter
- Direct Mail to Community Partners

- Public Information Sessions

As of the writing of this program, there are no complaints pending which alleges discrimination on the grounds of race color, national origin, religion, sex, disability, age, or other protected class.

Addressing Comments

The Incorporation of Public Comments into Decisions:

All comments received through the PPP are given careful, thoughtful consideration. Because there are a number of different ways participants or members of the community can comment on proposed service changes, all comments are assembled into a single document for presentation to the Director of Public Works.

Identification of Stakeholders

Our Community Partners:

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, Baldwin Park Transit has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of Baldwin Park Transit community stakeholders can be obtained by contacting Baldwin Park ' Development Department.

Stakeholder List:

Any community organization or person can be added to Baldwin Park Transit stakeholder list and receive regular communications regarding travel training services by contacting the Baldwin Park Public Works at (626) 813-5255. Local organizations and businesses can also request that a speaker from Baldwin Park Transit attend their regular meeting at the same number or through the Baldwin Park website at www.baldwinpark.com

NOTE: Because Baldwin Park Transit recently received the pass-through funds, there has been no public participation plan of this type written or implemented within the last three years.

EXHIBIT F

CITY OF BALDWIN PARK FIXED-ROUTE SERVICE STANDARDS

Background

FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers may establish their own standards.

Definitions

- Vehicle Load: Ratio of Passengers to seats in a vehicle. Generally defined as how crowded a public transit vehicle must be before additional service is added. It is usually written as a decimal point to two places which represents the percentage of the seats that are filled. For example, a 1.00 load factor means that every seat on the bus is full, 1.25 means that every seat on the bus is full and the number of standees equals 25% of the number of seats on the bus, and so on. In terms of assessing required service levels transit systems usually determine the average load factor at the peak load point.
- Vehicle Headway: is a measurement of time between vehicles in a transit system. Measurement of the distance from the tip of one vehicle to the tip of the next one behind it, expressed as the time it will take for the trailing vehicle to cover that distance. A "shorter" headway signifies a more frequent service.
- On-time performance for each mode: A measure of runs completed as scheduled. Schedule adherence or on-time performance refers to the level of success of the bus service remaining on the published schedule.
- Service Availability: A measure of system accessibility for community residents. Measure of a performance that has been generally defined according to the reliability and maintainability terms of mean-time-before-failure and mean-time-to-restore.

Ratio of Passengers to Available Seats Standards

The current vehicle load standard is 2.9 passengers per seat for both Teal and Pumpkin bus lines. This standard will be reviewed each year with adjustments based on prior year's performance.

Vehicle Headway Standards

The current vehicle headway standard is 0.05 buses per minute for both Teal and Pumpkin bus lines. This standard is reviewed each year with adjustments based on prior years performance.

On-Time Performance Standards

A vehicle is considered on time if it departs a scheduled time point no more than one minute early and no more than five minutes late. The transit systems on-time performance objective is 90% or greater.

The City of Baldwin Park continuously monitors on-time performance and system results are part of monthly performance reports covering all aspects of operations and maintenance.

Service Availability Standards

The City of Baldwin Park's service availability standards will strive to ensure that 90% of residents in the service area are within one-half mile of bus service.

EXHIBIT G

CITY OF BALDWIN PARK FIXED-ROUTE SERVICE POLICIES

Background

FTA requires that all providers of fixed-route public transportation develop qualitative policies for the following procedures:

- Vehicle Assignment
- Transit Amenities

Policies

Vehicle Assignment Policy

A vehicle(s) will be assigned to each of the HUB fixed-routes such that the average age of the fleet serving each route does not exceed over three years beyond the FTA useful life standard of the assigned vehicle type.

All vehicles will be equipped with air conditioning.

All vehicles will be equipped with wheelchair lifts or ramps.

All vehicles will be equipped with bicycle-racks.

All new bus purchased will be clean air certified buses.

The capacity of vehicles will be matched to the operating characteristics of the route.

Transit Amenities Policy

Installation of transit amenities along bus routes will be based on route passenger boarding's demand at bus stops and for Dial-A-Ride.

EXHIBIT H
CITY OF BALDWIN PARK
2010 Census Data
For Limited English Proficiency

Updated 06/07/2017

B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Universe: Population 5 years and over
2011-2015 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you. Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population

Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Baldwin Park city, California

Estimate Margin of Error

Total: 71,598 +/-397

Speak only English 12,327 +/-1,112

Spanish or Spanish Creole: 47,466 +/-1,292

Speak English "very well" 27,950 +/-974

Speak English less than "very well" 19,516 +/-959

French (incl. Patois, Cajun): 9 +/-20

Speak English "very well" 9 +/-20

Speak English less than "very well" 0 +/-28

French Creole: 0 +/-28

Speak English "very well" 0 +/-28

Speak English less than "very well" 0 +/-28

Italian: 28 +/-42

Speak English "very well" 0 +/-28

Speak English less than "very well" 28 +/-42

Portuguese or Portuguese Creole: 0 +/-28

Speak English "very well" 0 +/-28

Speak English less than "very well" 0 +/-28

German: 10 +/-15

Speak English "very well" 10 +/-15

Speak English less than "very well" 0 +/-28

Yiddish: 0 +/-28

Speak English "very well" 0 +/-28

Speak English less than "very well" 0 +/-28

Other West Germanic languages: 0 +/-28

Speak English "very well" 0 +/-28

Speak English less than "very well" 0 +/-28

Scandinavian languages: 0 +/-28

Speak English "very well" 0 +/-28

Speak English less than "very well" 0 +/-28

Greek: 0 +/-28

Speak English "very well" 0 +/-28

Speak English less than "very well" 0 +/-28

Baldwin Park city, California

Estimate Margin of Error

Russian: 1 +/-6

Speak English "very well" 0 +/-28

Speak English less than "very well" 1 +/-6

Polish: 22 +/-26

City of Baldwin Park Title VI Program

Speak English "very well" 14 +/-15
Speak English less than "very well" 8 +/-12
Serbo-Croatian: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28
Other Slavic languages: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28
Armenian: 5 +/-11
Speak English "very well" 0 +/-28
Speak English less than "very well" 5 +/-11
Persian: 10 +/-15
Speak English "very well" 0 +/-28
Speak English less than "very well" 10 +/-15
Gujarati: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28
Hindi: 117 +/-114
Speak English "very well" 92 +/-95
Speak English less than "very well" 25 +/-39
Urdu: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28
Other Indic languages: 63 +/-84
Speak English "very well" 21 +/-32
Speak English less than "very well" 42 +/-53
Other Indo-European languages: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28
Chinese: 5,571 +/-763
Speak English "very well" 1,666 +/-458
Speak English less than "very well" 3,905 +/-496
Japanese: 10 +/-13
Speak English "very well" 10 +/-13
Speak English less than "very well" 0 +/-28
Korean: 184 +/-120
Speak English "very well" 130 +/-107
Speak English less than "very well" 54 +/-42
Mon-Khmer, Cambodian: 278 +/-203
Speak English "very well" 130 +/-120
Speak English less than "very well" 148 +/-94
Hmong: 5 +/-10
Speak English "very well" 5 +/-10
Speak English less than "very well" 0 +/-28
Thai: 197 +/-137
Speak English "very well" 60 +/-58
Speak English less than "very well" 137 +/-97
Laotian: 369 +/-366
Speak English "very well" 182 +/-183
Speak English less than "very well" 187 +/-201
Vietnamese: 1,899 +/-374
Speak English "very well" 585 +/-183
Speak English less than "very well" 1,314 +/-258
Other Asian languages: 170 +/-138
Speak English "very well" 33 +/-48

Baldwin Park city, California

Estimate Margin of Error

Speak English less than "very well" 137 +/-116
Tagalog: 2,561 +/-519
Speak English "very well" 1,651 +/-390
Speak English less than "very well" 910 +/-236
Other Pacific Island languages: 262 +/-168
Speak English "very well" 147 +/-108
Speak English less than "very well" 115 +/-92
Navajo: 6 +/-8
Speak English "very well" 0 +/-28
Speak English less than "very well" 6 +/-8
Other Native North American languages: 0 +/-28
Speak English "very well" 0 +/-28

City of Baldwin Park Title VI Program

Speak English less than "very well" 0 +/-28
Hungarian: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28
Arabic: 13 +/-22
Speak English "very well" 13 +/-22
Speak English less than "very well" 0 +/-28
Hebrew: 2 +/-4
Speak English "very well" 2 +/-4
Speak English less than "very well" 0 +/-28
African languages: 13 +/-21
Speak English "very well" 13 +/-21
Speak English less than "very well" 0 +/-28
Other and unspecified languages: 0 +/-28
Speak English "very well" 0 +/-28
Speak English less than "very well" 0 +/-28

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables. Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: Language

User Note.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization. Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Explanation of Symbols:

1. An '*' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '****' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.