

TITLE VI PROGRAM

JUNE 2016



Montebello
BUS LINES

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INTRODUCTION AND BACKGROUND

As a recipient of Federal Transit Administration (FTA) funds, the City of Montebello is required to adhere to the Title VI regulations (49 CFR part 21) and to integrate into its Title VI Program considerations expressed in the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibility to Limited English Proficient Persons (70 FR 74087, December 14, 2005). In addition, the Title VI Program has been updated to include new provisions mandated by the FTA Circular 4702.1B on October 1, 2012. Moreover, the procedures contained herein will assure that no person is excluded from participation in, or denied the benefits of its services, with regard to fares, routing, scheduling, or quality of transportation service on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. Further, the frequency of service, age and quality of the MBL vehicles assigned to routes, quality of MBL bus stops, and location of routes will not be determined on the basis of race, color or national origin.

The City of Montebello is located nine miles east of downtown Los Angeles. The City is surrounded by the cities of Monterey Park and Rosemead to the north, City of Commerce to the south, Los Angeles and East Los Angeles to the west, and the City of Pico Rivera to the east. The City covers an area of 8.2 square miles. The 2010 Census reports a population of 62,500, which gives the City a population density of 7,622 persons per square mile. The City is primarily Hispanic accounting for 79.3% of the population; followed by Anglo accounting for 53.8% of the population; and Asian who account for 11% of the population.

Transportation service began in the City of Montebello in 1910 with one motorized coach. The City of Montebello was predominantly an agricultural community; however, World War I and the discovery of oil in the Montebello Hills quickly changed the community. By 1917, there were four private companies competing for passengers among the influx of workers drawn to the area.

In 1922, two years after the incorporation of the City of Montebello, the City officially began a municipal bus service. Six years later, the City sold the operation to Motor Transit Company, a division of the Southern Pacific Railroad. The Motor Transit Company later became Pacific Electric; operators of the famed "red cars". In 1931, the City established Montebello Bus Lines (MBL) with the acquisition of a bus terminal on Greenwood Avenue and the purchase of the lines from Pacific Electric.

Currently, MBL serves over eight (8) million passengers a year throughout the communities of Alhambra, Bell Gardens, Boyle Heights, Commerce, Downtown Los Angeles, East Los Angeles, La Mirada, Montebello, Monterey Park, Pico Rivera, Rosemead, San Gabriel, San Marino, South Gate and Whittier. Moreover, during its peak period, MBL operates sixty-six (66) transit vehicles that provide service throughout several urbanized areas in Los Angeles County. Within this area, MBL provides connecting service to high demand rail stations such as the Montebello / Commerce Metrolink station, Metro Blue Line, Metro Red Line and four stations along the newly constructed Metro Gold Line; as well as connects with multiple transit providers in the heavily congested Downtown Los Angeles area. MBL also maintains 168 bus stops within the City limits and services in excess of 600 additional bus stops beyond the City boundaries.

MBL has embarked on a comprehensive bus stop improvement program that will upgrade the existing stops with solar-powered LED security lighting which are energy efficient; more importantly, security will be enhanced for waiting patrons.

As detailed in the MBL *Line-By-Line Analysis of Transit Services and Market Survey*, prepared July 2015, transit usage in the MBL service area (8%) is greater than the average for Los Angeles County (7.1%). Accordingly, MBL is committed to its core value of providing “superior transit services” in an accessible, reliable and safe manner. Additionally, staff strives to meet the mobility, environmental, and energy demands placed upon MBL while also working diligently to improve overall efficiency in servicing these demands to maintain the public trust and confidence.

GENERAL REQUIREMENTS

The City of Montebello adheres to the Title VI regulations (49 CFR part 21) and ensures that the public is well advised of MBL’s Title VI Policy and Complaint Procedure in this regard.

Notice of Rights

The MBL *Title VI Notice of Rights* document is included in the Department of Transportation Operator’s Manual, is reflected in the agency’s website and displayed on interior bus cards (Appendix A). The document states the following:

Montebello Bus Lines (together, hereinafter, referred to as “MBL”), 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 protected by Title VI of the Civil Rights Act of 1964, as amended.

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

In addition, the frequency of service, age and quality of MBL vehicles assigned to routes, quality of MBL bus stops, and location of routes will not be determined on the basis of race, color or national origin.

MBL also maintains a brochure that details the *Title VI Notice of Rights* afforded under the Civil Rights Act of 1964; explains Title VI and the programs encompassed therein; identifies discriminatory actions; and describes the complaint process, as well as the role of the Department of Justice who coordinates the enforcement of Title VI.

Complaint Process

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a Title VI complaint with MBL. MBL employs a zero tolerance policy relative to alleged acts of

discrimination and posts the process for filing a complaint on the Department of Transportation website. The Title VI Complaint Form (Appendix B) may be printed from the www.rideMBL.com website or may also be requested from MBL Customer Service who can be reached at (323) 558-1625. The Title VI Complaint Form is also available for pickup at the Department of Transportation, 400 S. Taylor Avenue, Montebello. The completed form must be returned to Montebello Bus Lines, Transit Operations Manager, 400 South Taylor Avenue, Montebello, CA 90640.

Complaints should be filed within one hundred and eighty (180) days of the date of the alleged discrimination and should include the following information:

1. Complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
2. Description of how, when, where, and why complainant believes the discrimination occurred. In addition, the location, names, and contact information of any witnesses should also be included.

In addition to the MBL Title VI Complaint Process, a complainant may file a Title VI complaint directly with the:

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105-1839

Complainants may also file a Title VI complaint with an external entity such as the Department of Justice, other Federal or State agency, or a Federal or State court. However, should a complaint be filed with MBL and an external entity simultaneously, the external complaint will supersede the MBL complaint and MBL's complaint procedures will be suspended pending the external entity's findings.

All complaints alleging discrimination based on race, color or national origin relative to a service or benefit provided by MBL will be recorded. MBL staff will forward the Title VI complaint to the Director of Transportation and will provide appropriate assistance to complainant(s), including those persons with disabilities, or who are limited in their ability to communicate in English. MBL will make every effort to resolve such complaints in a quick and expeditious manner.

In instances where additional information is needed for assessment or investigation of the complaint, MBL will contact the complainant within 15 working days. Failure of the complainant(s) to provide the requested information within the specified timeframe may result in the administrative closure of the complaint.

MBL will investigate the complaint and prepare a response subject to review by MBL's Director of Transportation. If appropriate, MBL may administratively close the complaint and advise the

complainant(s) of his / her right to file a complaint externally.

The complainant(s) will also be advised of his / her right to appeal the response to Federal and State authorities as appropriate. MBL will employ every effort to respond to a Title VI complaint within sixty (60) working days of its receipt of such a complaint, unless a complaint is filed with MBL and an external entity simultaneously as noted previously.

MBL will send a final written response to the complainant(s) and advise the complainant(s) of his or her right to file a complaint externally. MBL will make every effort to respond to Title VI complaints within sixty (60) working days of its receipt of such complaints.

List of Title VI Investigations, Complaints or Lawsuits

As previously stated, MBL 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. Accordingly, MBL has not had any Title VI investigations, complaints or lawsuits that allege discrimination by the City of Montebello with respect to service or other transit benefits since the previously submitted Title VI Program in 2013. MBL regularly affirms its moral and legal obligation to uphold the requirements of Title VI and includes an assessment / report of such in the annual Short Range Transportation Plan.

Public Participation Plan

In accordance with the current guidelines relative to Title VI, MBL has prepared a Public Participation Plan to promote public involvement in transit planning decision-making activities. This proposed plan will establish formal procedures that allow for, encourage, and monitor public participation within the MBL service area including, but not limited to, minority individuals, persons with Limited English Proficiency (LEP), and low-income populations. The MBL Public Participation Plan (Appendix C) describes proactive public outreach strategies and procedures.

To that end, truly meaningful public involvement requires an informed public. Accordingly, it is MBL's policy to encourage the public to express their needs and concerns so that transportation decisions better reflect community values, interests and needs. Therefore, educating the public on transportation decisions relative to the MBL service area is at the forefront of public outreach activities.

Limited English Proficiency

Individuals who have a limited ability to read, write, speak, or understand English are limited English proficient, or "LEP." According to the 2010 U.S. Census data for Los Angeles County, 56.6 percent of the individuals over the age of five (5) years spoke a language other than English in the home. Among limited English speakers, Spanish is the language most frequently spoken.

Public transportation is often the primary means of achieving mobility for many LEP persons. As such, MBL strives to provide language assistance to such individuals in a competent and

effective manner to ensure that transit services are safe, reliable, convenient, and accessible to those persons. Moreover, MBL makes an effort to improve mobility within its service area by providing transportation services in an equitable manner to all segments of society. MBL emphasizes the fair treatment of people of all races, cultures, and income levels, including minority and low income populations.

To that end, the addendum to the *Line-By-Line Analysis of Transit Services and Market Survey*, prepared July, 2015, analyzed the language groups and English language proficiency of residents in the MBL service area for purposes of public outreach. The document is also used to assist MBL in identifying the transportation needs of immigrant populations and ensuring that transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations. The *Four Factor Analysis* to improve access for LEP persons and the *Implementation Plan for Language Assistance* (Appendix D) reflects identified needs.

In addition, MBL has implemented measures to ensure that information relative to the services provided is made available to customers who are Limited English Proficient as described below:

- Public Information – MBL’s Route Brochures, which provide scheduling, route and fare information; Rider Alerts; Surveys and Public Notices are published in a bi-lingual format (English/Spanish). Spanish and English newspapers are used to publish hearing notices, as well as to provide information relative to the operation of MBL.
- Customer Service Center – MBL’s Customer Service Center is well equipped to provide information to the community relative to the services that are provided. Bi-lingual staff are available to answer questions or accept comments related to MBL transportation services; bus fares and discounted fare information; lost and found; Montebello Link shuttle services, and Dial-A-Taxi services. Sales of bus tokens, EZ Passes, Student Monthly Passes, and Dial-A-Taxi coupons are also offered. Customers are able to visit or call the customer service staff Monday through Friday, 8:00 am to 5:00 pm, except on legal holidays. The Customer Service Center may also assist with trip planning and logging complaints.
- Community Partners – MBL has established partnerships for purposes of purchasing MBL tokens and monthly passes with various community businesses both within city boundaries, as well as in the neighboring communities in which service is provided to promote ridership and facilitate ease of ticketing.
- Fare and Service Change Information – Notices regarding public outreach meetings and hearings on fare and / or service changes are published in English and Spanish newspapers; and all customer comments are welcomed by MBL.

Non-Elected Advisory Councils

At this time, MBL does not have a transit advisory group comprised of non-elected officials. Rather, the Transportation Ad-Hoc Committee, comprised of two council members and the Department of Transportation Director, works collectively to maintain open channels of communication. In addition, the City has several commissions that occasionally discuss transit matters, including the *Traffic and Safety Commission*, the *Planning Commission*, and the *Culture and Recreation Commission*. All City of Montebello commissions consist of five members, the

majority of whom are minorities. Commission vacancies are advertised in English and Spanish newspapers to allow for equal representation.

Sub-recipient Monitoring

MBL does not currently have any sub-recipients. However, if the situation were to change in the future, any sub-recipient would be held to the same standard as the City of Montebello relative to Title VI regulations (49 CFR part 21).

City of Montebello Resolution

A copy of the Resolution of the City Council of the City of Montebello approving and adopting the MBL Title VI Program is reflected in Appendix E.

Certification and Assurances

The Civil Rights Assurance and Title VI Assurance have been incorporated in the Annual Certification and Assurance submission to FTA; and the document has been uploaded into TEAM - the FTA database. A copy of the Annual Assurance can be found in Appendix F.

Construction Impact Analysis

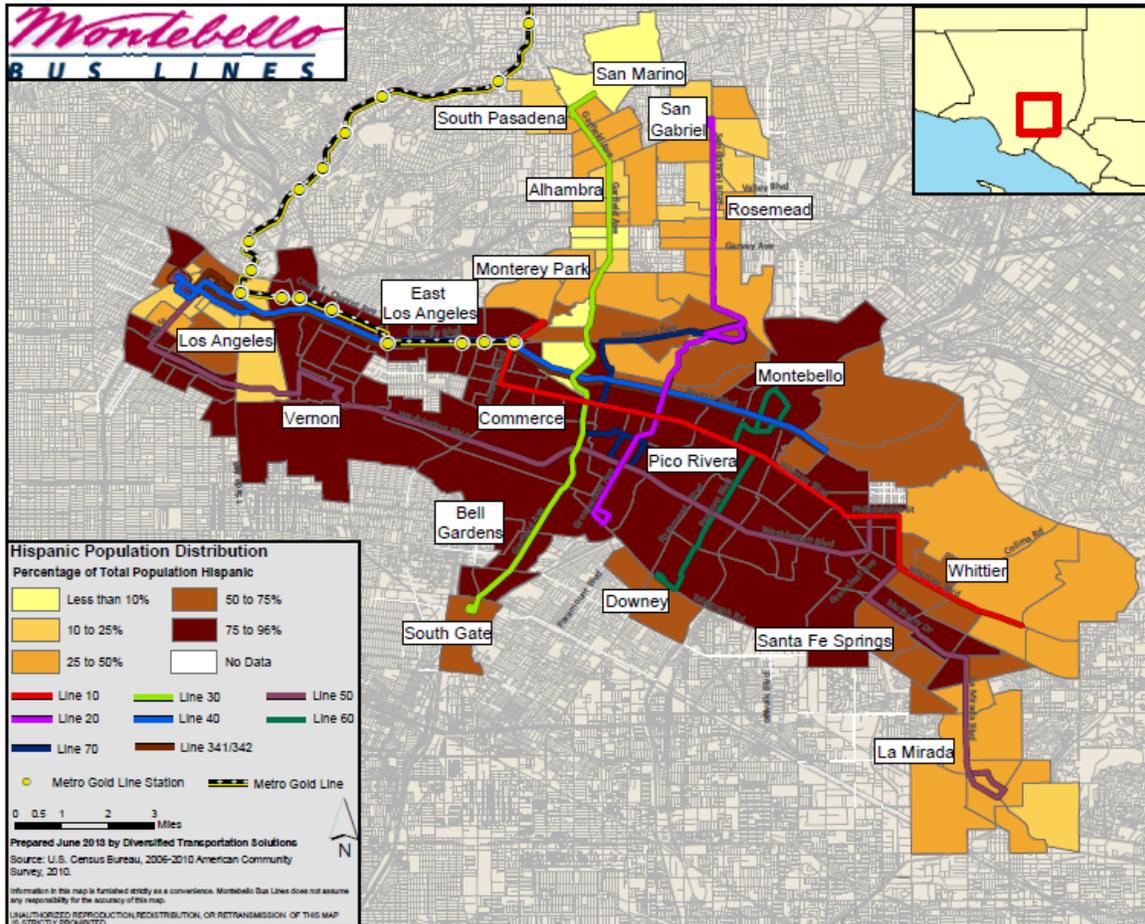
MBL does not currently have any ongoing construction projects that impact transit operations or services. However, the maintenance shop was upgraded in 2012 to accommodate service and repair on MBL's new Compressed Natural Gas (CNG) buses consistent with Federal and local guidelines. Work on the facility was completed in late 2012.

DEMOGRAPHIC AND SERVICE PROFILE

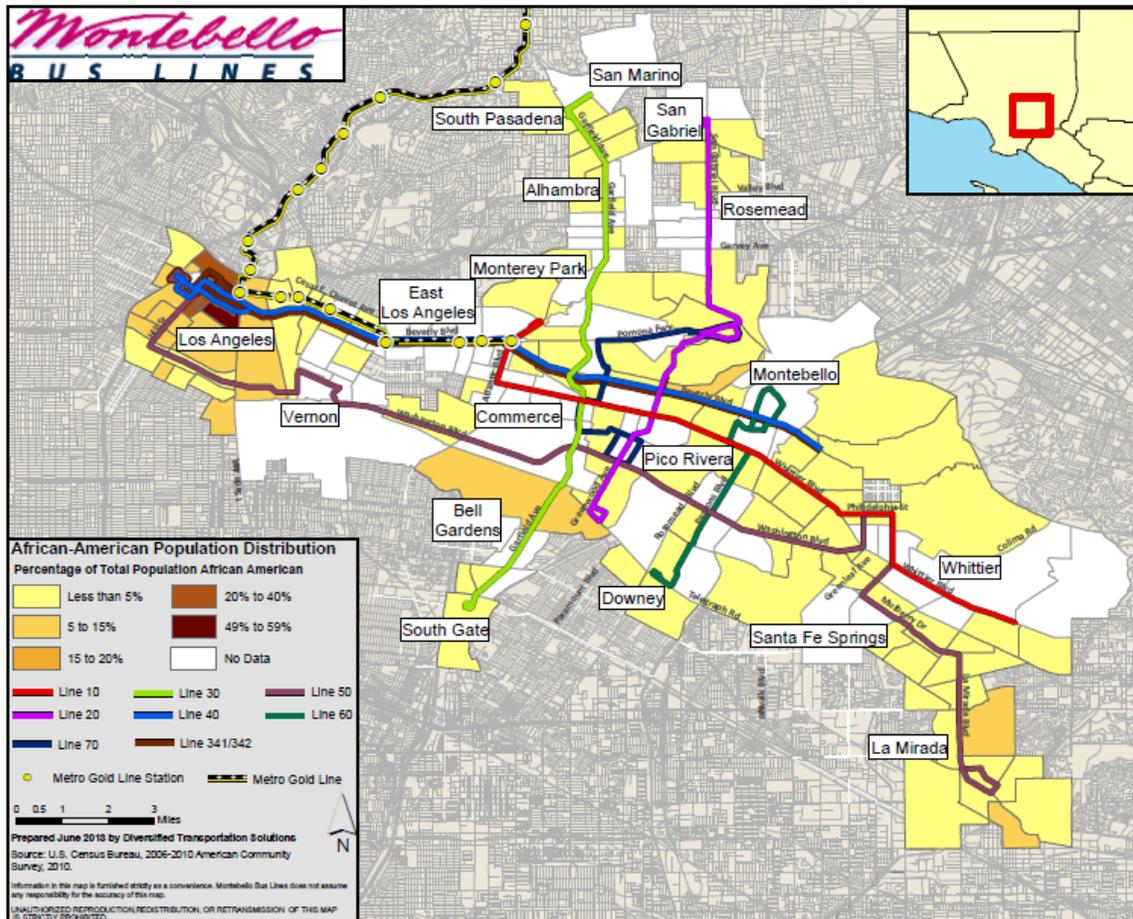
MBL services a relatively diverse population. The most prominent minority populations in MBL's service area are Hispanics and Asians. The following maps highlight the minority populations in MBL's service area.

- A. System Map
- B. Hispanic Density Map
- C. African American Density Map
- D. Native American Density Map
- E. Asian Density Map
- F. Native Hawaiian and Pacific Islander Density Map
- G. Other Race / Ethnicity Density Map

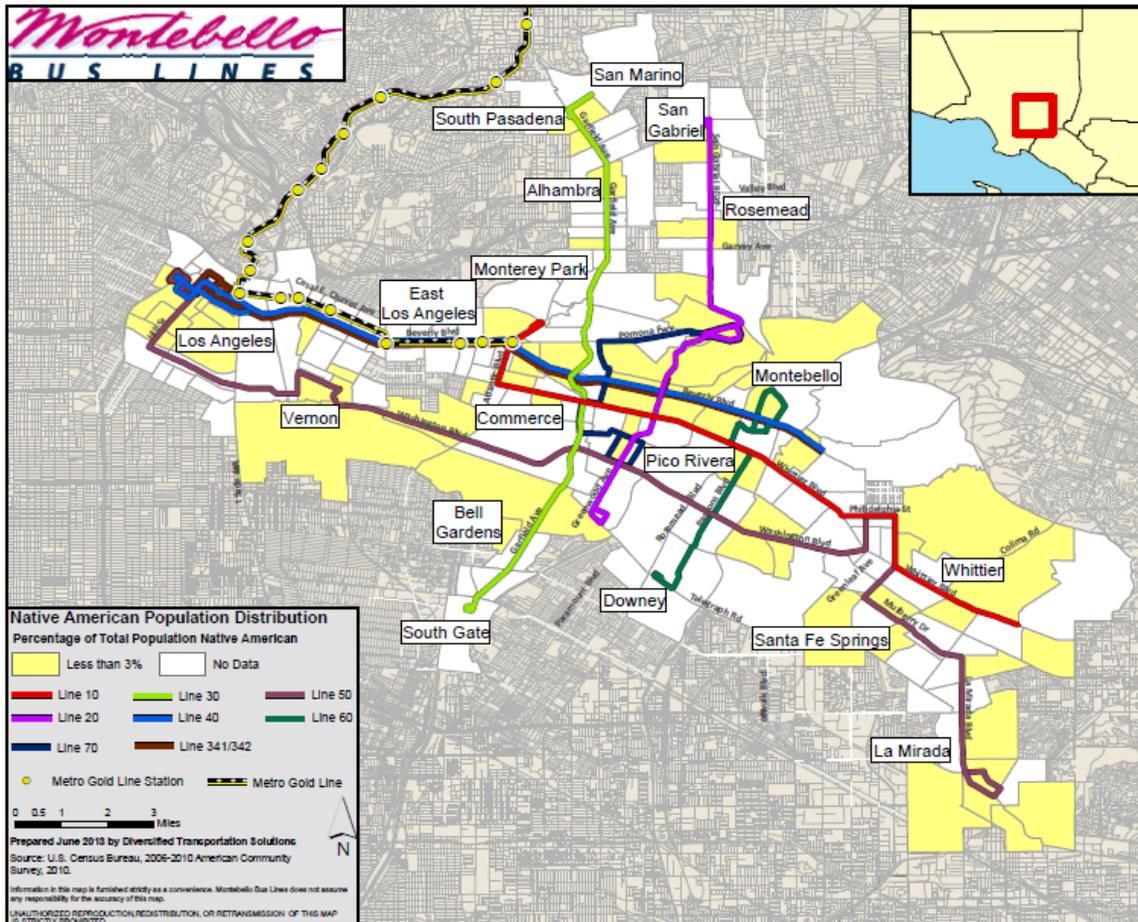
B. Hispanic Density Map



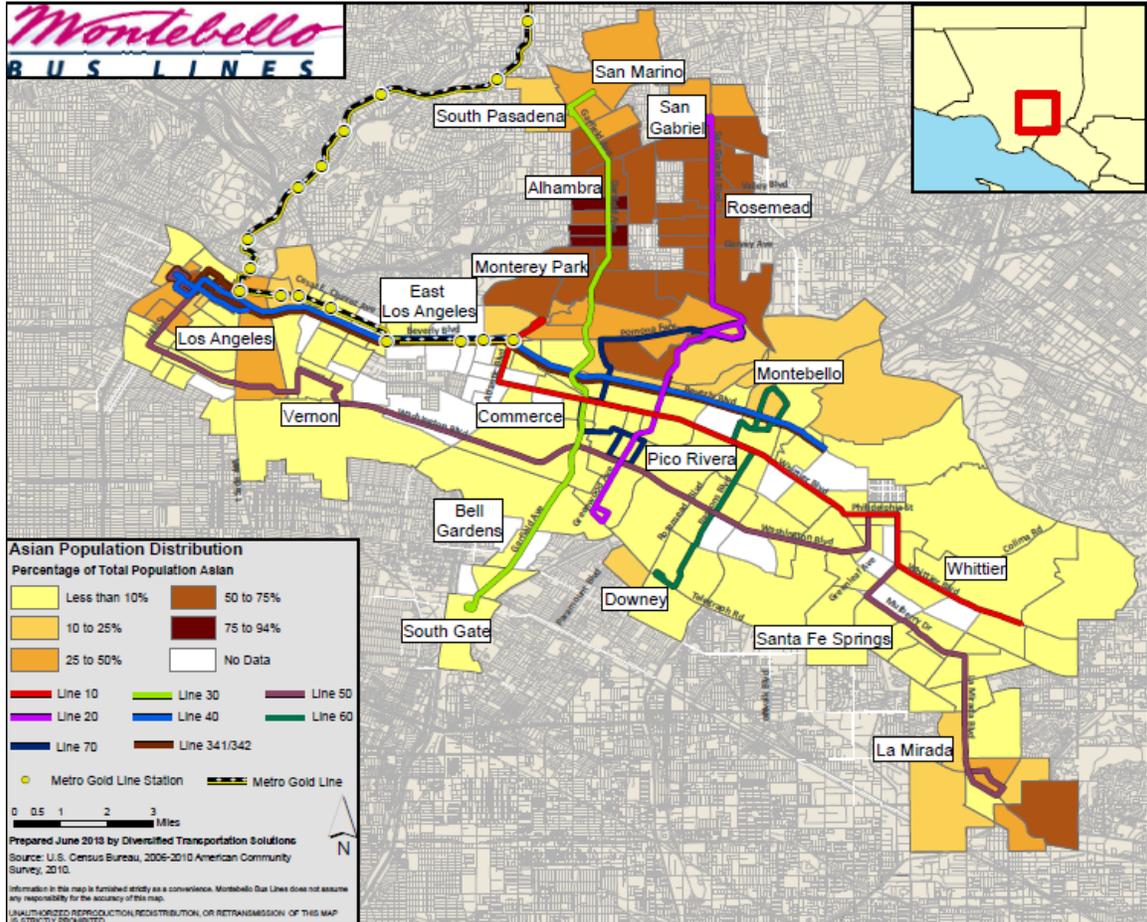
C. African American Density Map



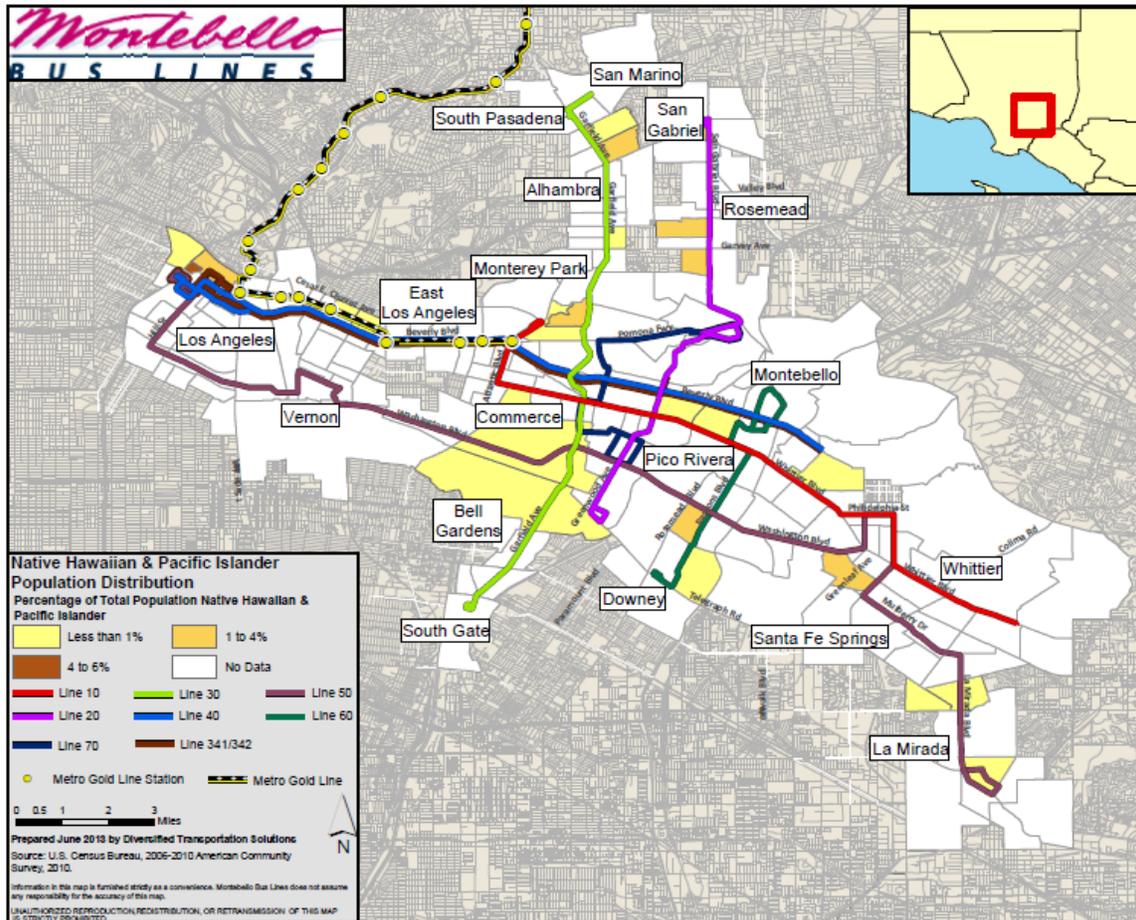
D. Native American Density Map



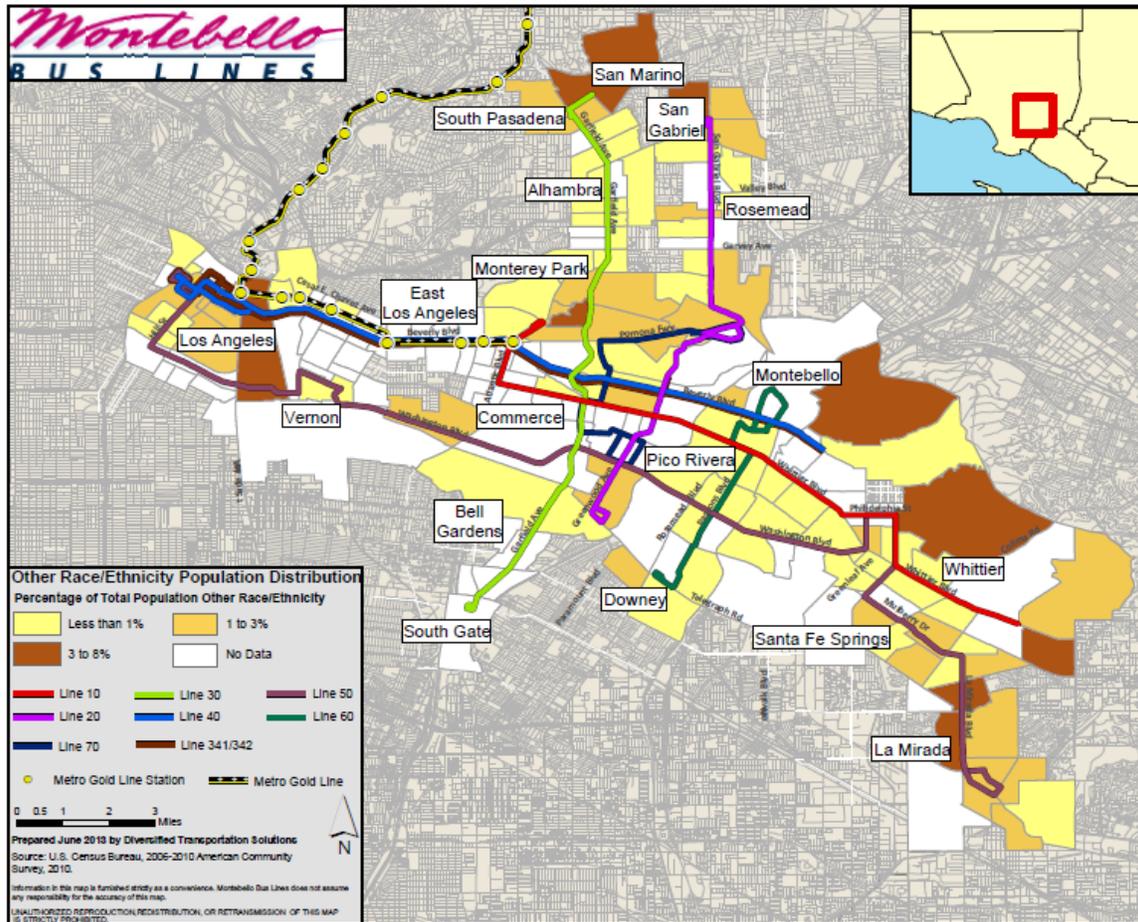
E. Asian Density Map



F. Native Hawaiian and Pacific Islander Density Map



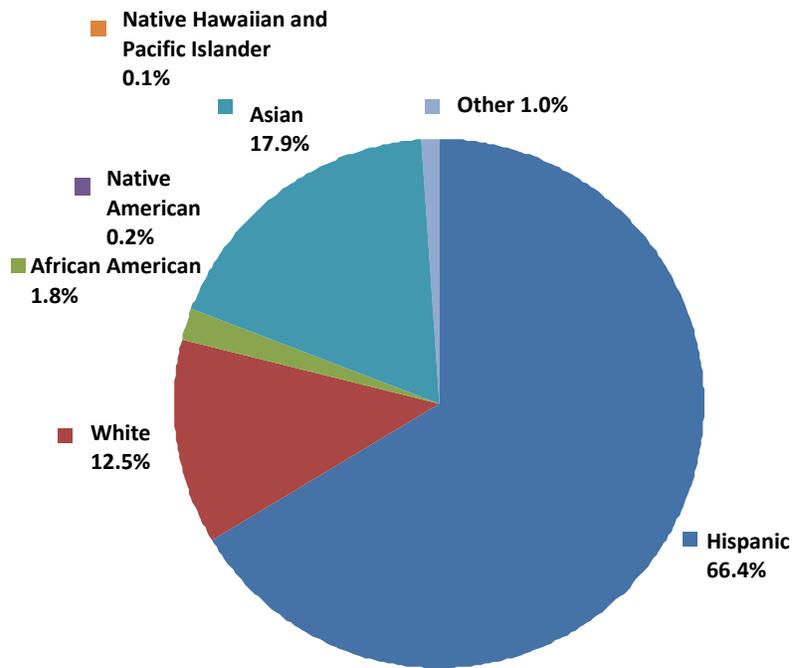
G. Other Race / Ethnicity Density Map



Racial Distribution

The majority of the population served by MBL is Hispanic, accounting for 66.4% of the population. Asians represent 17.9% and Caucasians account for 12.5% of the population. The remaining ethnicities are reflected in Figure 1, System Racial Distribution.

Figure 1: System Racial Distribution



Source: 2010 American Community Survey

The communities which comprise the MBL service area encompass the ethnicities as reflected in Table 1 below:

Table 1: Racial Distribution Chart

City/Ethnicity	White	African Am.	Hispanic	Asian	Native Am.	Other
Alhambra	9.3%	1.3%	34.0%	53.7%	0.2%	1.5%
Bell Gardens	2.3%	0.5%	96.1%	0.6%	0.2%	0.3%
Commerce	3.2%	1.1%	93.7%	1.1%	0.4%	0.5%
La Mirada	36.1%	2.1%	40.9%	18.2%	0.3%	2.4%
Los Angeles	28.6%	8.7%	48.9%	11.3%	0.2%	2.3%
Montebello	8%	0.6%	80.1%	10.5%	0.1%	0.6%
Monterey Park	4.5%	0.4%	26.4%	67.3%	0.1%	1.3%
Pico Rivera	4.7%	0.6%	91.7%	2.4%	0.2%	0.4%
Rosemead	3.9%	0.2%	32.3%	62.7%	0.1%	0.8%
San Gabriel	10.2%	0.9%	24.6%	62.8%	0.1%	1.4%
Santa Fe Springs	10.4%	1.9%	82.5%	3.9%	0.3%	1.0%
South Gate	2.9%	0.6%	95.3%	0.7%	0.1%	0.4%
Vernon	52.2%	5.5%	40.5%	1.8%	0.0%	0.0%
Whittier	26.0%	0.9%	67.9%	3.8%	0.2%	1.2%

Source SCAG 2013, Local Profiles of SCAG Member Jurisdictions

SERVICE STANDARDS

In accordance with FTA obligations, the MBL Title VI Program reports on a variety of information and analyses to demonstrate compliance with the Title VI requirements as contained in the Civil Rights Act of 1964; and with other regulations governing the topic. Based upon FTA Circular 4702.1, the following information provides documentation demonstrating that MBL has followed Title VI and is indicative of the agency's commitment to providing high-quality transportation services to all the communities within the MBL service area.

Short Range Transit Plan

The Short Range Transportation Plan (SRTP) is prepared primarily for purposes of detailing MBL's vision and goals; and to ensure that all Federal, State and local reporting requirements are achieved, data collection efforts are coordinated, and that MBL's budget is consistent with Los Angeles County Metropolitan Transportation Authority (Metro) planning policies and funding assumptions. The SRTP is presented to the City of Montebello Council at which time the community is afforded the opportunity to provide input; as well as to make inquiries. Upon approval by Council, the SRTP is posted on the City of Montebello website.

MBL operates in accordance with its mission statement; and is guided by a set of goals and objectives that serve as the blueprint for the future of the agency.

Mission Statement – *“To provide superior transportation services to Montebello and surrounding communities.”*

Goal 1 – Develop strategies and administrative processes that support the long-term vision.

Objectives:

- Enhance financial tracking by replacing the citywide automated financial system
- Enhance the employee recruitment process
- Streamline the payroll production process
 - Short-term: Improve the existing system
 - Long-term: Tie into the City's new payroll system
- Improve the purchasing process
- Implement a comprehensive database (Transtrack) for report generation including but not limited to ridership data, fleet maintenance and customer feedback reports
- Improve the risk management reporting system
- Assess and revise existing Procedure Manuals (Grant Administration/Procurement) and develop master calendar for timely reporting and revision of mandatory programs (DBE, EEOP and Title VI)

Goal 2 – Meet and exceed customer expectations by providing safe, clean and reliable service.

Objectives:

- Provide safe, clean and user-friendly bus stops
- Maintain and improve interior and exterior appearance of the fleet
- Develop and maintain a user-friendly fare system
- Expand access to customer information
- Improve system reliability
- Install perimeter security fencing and gates at the Transportation Facility
- Install a new security surveillance camera system at the Transportation Facility and Metrolink Transit Center for increased security
- Upgrade the lighting at the Metrolink Transit Center for increased visibility and security
- Install a new security access control system at the Transportation Facility
- Implement an undercover Transit Security law enforcement program

Goal 3 – Provide a network of services to Montebello and Southeastern Los Angeles County.

Objectives:

- Actively pursue options for increased transit connections
- Foster partnerships within Montebello and surrounding cities
- Ensure the continued free movement of buses and the people on them
- Assert MBL's presence in mobility improvement for the region
- Conduct planning and development research
- Operate high quality Dial-A-Taxi service
- Operate the Montebello Link, a semi-fixed-route feeder service to and from the Montebello Metrolink Transit Center

Goal 4 – Use financial, technology, and human resources effectively and wisely.

Objectives:

- Implement a training program to enhance employee professional development
- Improve communication and teamwork throughout the Department of Transportation
- Create opportunities for employees to work together
- Ensure that financial and management standards meet desired results
- Implement an automated Vehicle Maintenance Management System
- Enhance the Facility Maintenance Program
- Update and refine the fleet replacement program/schedule (buses and vehicles)
- Implement an AVL/ CAD System
- Implement an Automatic Passenger Counter System
- Upgrade the bus and chassis wash to improve operational efficiency
- Develop a sustainable Transportation Facility Master Plan that addresses future growth and development

- Improve Departmental efficiency through automation

MBL continuously strives to attain established goals and objectives set forth in the annual SRTP while fulfilling community interests and needs. In particular, public outreach is at the forefront of MBL activities which include but are not limited to:

Improved Customer Information Services and Amenities

- Upgraded website, social media sites and phone system to provide a more attractive, user-friendly and enhanced interface experience for patrons; while also providing an opportunity to provide feedback and make inquiries.
- Continued zero tolerance graffiti abatement program on fleet.
- Revitalized Metrolink Transit Center that consisted of sidewalk and pavement repairs, replacing grassy areas with sustainable landscaping, and removing diseased trees. Additionally, signage, railings and other metal structures were painted. This environmentally sustainable project is attractive, yet is based on sound horticultural practices. Phase II of the Metrolink Transit Center Revitalization Project will include upgrades to meet current Americans with Disabilities Act requirements.

Community Based Marketing

- Maintained a multi-year marketing plan designed to attract new riders, sustain existing ridership and promote public transportation as a viable transportation option.
- Redesigned printed materials, including electronic versions that display information in English and Spanish.
- Issued press releases to notify the community of various projects and accomplishments.
- Established new, and cultivated existing, public and private partnerships.

Community / Public Outreach

- Participated in several rideshares to promote MBL's services as a viable, convenient and cost effective mode of transportation.
- Launched new programs intended to create awareness and promote public transportation while enhancing the image of MBL. For example, MBL participated in the *Rider Relief Transportation Program* led by Los Angeles County Metropolitan Transportation Authority which provides fare subsidy coupons that allow low-income patrons to redeem toward transit passes for eligible riders including adult regular fare, Senior / Disabled/Medicare, K-12, and college / vocational students who meet the criteria.
- Adopted a "Passenger Perspective" to view issues from the passenger's point of view; base decisions on increasing passenger ease and satisfaction to the extent feasible; and viewing the customer as the reason for being.

In late 2012, the City created a Transportation Ad-Hoc Committee comprised of two council members and the Director of Transportation to further facilitate community engagement, foster awareness and perfect the passenger experience.

Service Overview

As previously stated, MBL provides public transportation services within the City of Montebello and the surrounding communities of Alhambra, Bell Gardens, Boyle Heights, Commerce, Monterey Park, Pico Rivera, Rosemead, San Marino and the unincorporated area of East Los Angeles. Services are also provided from Montebello to the Cities of Whittier and La Mirada to the east; to downtown Los Angeles to the west; to San Gabriel to the north; and South Gate to the south. MBL operates nine fixed-route services; all lines operate Monday through Friday as a basic service pattern. Lines 10, 20, 30, 40, 50 and 60 provide service on Saturdays and Lines 10, 20, 30, and 40 also operate on Sundays.

Table 2 identifies the peak frequencies by service day for each of the respective MBL routes.

Table 2: MBL Service Frequency

Line	Description	Peak Service Frequency (in minutes)		
		Weekday	Saturday	Sunday
10	Service from Whittwood Mall, Whittier to East Los Angeles College, Monterey Park	12	10	10
20	Service from Telegraph Road, Montebello to Las Tunas, San Gabriel	15	15	15
30	Service from South Gate to San Marion via Garfield Avenue	45	60	60
40	Service from Montebello and City of Whittier to Downtown Los Angeles	11	15	15
50	Service from La Mirada to Downtown Los Angeles via Washington Blvd.	15	60	--
60	Service from San Gabriel River Parkway, Pico Rivera to Telegraph Road, Pico Rivera	27	70	--
70	Service from Montebello Town Center to Metrolink Station, Montebello	30	--	--
341	Express service to downtown Los Angeles from Taylor Ranch, Montebello	20	--	--
342	Express service to downtown Los Angeles from Norwalk Blvd, Whittier	25	--	--

MBL operates a fleet of sixty-six buses, including a contingency reserve fleet of eight buses, comprised of fifteen diesel powered buses, forty-four hybrid / gasoline and seven CNG buses. The older diesel buses will be phased out of operation in accordance with the MBL fleet replacement program / schedule to comply with the state's Air Quality Management District requirements. The entire fleet is equipped with wheelchair lifts, kneeling devices, radios, air conditioners, bike racks, security cameras and other standard operating equipment. Appendix G provides an inventory of the MBL fleet.

In addition to the fixed-route service, MBL provides demand response Dial-A-Taxi services for the elderly and disabled. Dial-A-Taxi services are available twenty-four hours a day, seven days a week, including holidays. MBL also participates in the mandated para-transit transportation program for Los Angeles County provided by ACCESS Services, a local public entity established to meet the Americans with Disabilities Act.

Vehicle Load

MBL's fixed-route service utilizes standard coaches that are thirty-five (35) and forty (40) foot long, with seating capacity for twenty-nine and thirty-eight passengers respectively; standing load capacity is forty-one and thirty-seven respectively, with two wheelchair tie-down positions on each vehicle.

To ensure that routes do not become overcrowded, upgraded frequencies are provided when the average route load exceeds the standard. **The vehicle load standard for local service is 125% peak/100% off peak and for Express Service 100% all day.** Vehicle load factors are monitored through daily ridership data and strategic line-by-line analysis studies conducted by independent consultants. MBL will conduct additional surveys if comments or complaints are received relative to overcrowding on a given route. Through diligent monitoring, MBL is able to maintain its vehicle load at acceptable standards. The latest line-by-line analysis study (July 2015) concluded that there is no significant overcrowding that warrants additional buses.

Vehicle Assignment

MBL coaches are assigned to each route based upon route-level capacity requirements. Higher seating capacity (38-seat) buses are assigned to the longest high volume lines with multiple peak-load points. The 29-seat buses are generally assigned to lines with lighter loads.

Aside from the length of the bus and the greater seating capacity of the larger buses, all vehicles are identical (including wheelchair lifts and air conditioning on all coaches), thereby providing the same amenities and accessibility features to all passengers in all serviced communities.

Vehicle Headway

Market demand, performance standards, and availability of resources generally determine the line-by-line headways. MBL has a very ambitious program to assess line-by-line load factors in order to determine whether higher frequencies are needed to meet the market demand. **Headway**

standards are Local Service, 30-45' peak, 60' weekday off-peak, weekends, and holidays. Express service headway standards are 60' peak.

Currently, MBL has three service categories including, major local, minor local, and peak express. These categories are detailed as follows:

- ✓ Major Local Service (Lines 10, 20, & 40) – These lines run at high frequencies and cover a long service day, with service provided late into the evening and on weekends. They serve major travel corridors with intensive demand: Beverly Boulevard, Whittier Boulevard, and Montebello Boulevard. The frequent service permits easy transferring between routes.
- ✓ Minor Local Service (Lines 30, 50, 60, & 70) – These lines generally run at lower frequencies than the major lines. This service provides access to major trip generators and serves corridors with less transit-supportive land use, compared to major local service corridors.
- ✓ Peak Express Service (Lines 341 & 342) – These lines provide weekday peak-hour express service from major activity centers and transit hubs in Montebello to downtown Los Angeles. The express service provides higher speed and limited stop service.

On-Time Performance

In addition to monitoring vehicle load, vehicle assignment, and vehicle headway, MBL has performance standards it relies upon to ensure that patrons receive quality services. Table 3 illustrates MBL’s performance compared to the standard of key performance measures. **On-time performance standards are 85% on-time at time points, which is defined as 0-5 minutes from scheduled departure time. This applies to local and express service.**

Table 3: Fixed-Route Performance Measurements

Measure	Performance
Cost per Revenue Hour	\$98.74
Farebox Recovery Ratio	24.6%
Pay to Platform Hour Ratio	1.03 hrs
Overtime Ratio: Operations	9.8%
Overtime Ratio: Maintenance	1.6%
Passengers per Revenue Hour	37
On-Time Performance	85.8%
Buses on Hold	8
On-Time PM Inspections	99%

Transit Amenities

MBL currently has 168 bus stops within the City. Forty-six of these stops include shelters and the majority of the stops have solar lighting systems for safety and convenience. MBL is currently working on the second phase of the Bus Stop Improvement Project which will entail upgrading all bus stops and amenities within the City. Market demand will determine the location and type of bus stop amenities that will be installed.

All bus stops within the City meet the requirements set forth in the Americans with Disabilities Act relative to the clearance dimensions for the location of the bus stop amenities. In addition, MBL is committed to providing its patrons with clean and safe waiting areas. As such, MBL contracts out all maintenance and custodial services of the bus stops to ensure that the bus stops are clean and safe for its patrons in all communities served.

Transit Access

MBL is housed in its own federally funded facility at 400 South Taylor Avenue, Montebello CA 90640. The facility serves as MBL's headquarters, bus division / yard and maintenance facility. The location is perfectly situated in the center of MBL's service area and provides optimal access to manage its transit services; as such, the facility location does not result in a disparate impact.

MBL provides fixed-route service to its patrons who predominately reside within ¼ mile of MBL routes. In many areas, Los Angeles County Metropolitan Transportation Authority (Metro), the regional operator, provides service within a city block of MBL, as well as duplicates service on some routes. Accordingly, the passenger is assured of accessible transportation.

Moreover, MBL service has been implemented in response to identified needs regarding route alignment and headways. MBL has made every effort to provide access to all public transit users and shares this practice with the regional provider, Metro, who also ensures that there is an equal distribution of transit services throughout the region.

REQUIREMENT TO MONITOR TRANSIT SERVICE

In accordance with Title VI regulations, MBL monitors the performance of the system relative to system-wide service standards and policies.

Compliance Procedures

Every three years, a strategic line-by-line analysis is conducted on Montebello Bus Lines fixed-route transit services. **Diversified Transportation Solutions completed the most recent analysis in July 2015.** The *Line-By-Line Analysis of Transit Services and Market Survey* has the following objectives:

- ✓ Gather current service and patronage data to assist management and staff in evaluating current performance and planning future service.
- ✓ Assess system-wide operating ridership and performance.

- ✓ Conduct a detailed analysis at the route, route segment, time of day and day of week levels of current ridership and performance measures.
- ✓ Analyze intra and inter system transfer patterns.
- ✓ Assess the level of unmet mobility needs within the MBL service area.
- ✓ Present the findings of intercept surveys conducted at major bus stops and a random telephone survey of area residents.
- ✓ Develop a series of recommendations for improvements to MBL's fixed-route bus network.

The *Line-By-Line Analysis of Transit Services and Market Survey* prepared for MBL provides detailed information on service effectiveness, ridership, capacity issues, passenger loads, route performance, and schedule adherence by the route level. This information provides MBL with the necessary data to ensure that vehicle load, assignment, and headway standards are met. The *Line-By-Line Analysis of Transit Services and Market Survey* also captures passenger-boarding detail, which assists MBL with the determination and placement of transit amenities. Unmet transit needs in the City of Montebello are documented by the *Line-By-Line Analysis of Transit Services and Market Survey* as well as by field observations, customer complaints, and suggestions.

Service and Fare Changes

Periodic service changes are needed to address changing ridership trends, population distribution, land use patterns, unmet transportation needs, and availability of resources. The FTA requires that funding recipients prepare and submit service and fare equity analyses for public comment in consideration of proposed major service or fare changes. Accordingly, MBL has established a threshold that defines a “major service change” and the definition of an ensuing adverse impact that would be created by a “major service change”.

Specifically, a major service change is defined by MBL as meeting one of the following criteria:

1. All proposed fare changes excluding ride free promotional events, and temporary fare reductions that are mitigating measures for other actions.
2. All promotional fare reductions remaining in effect after six (6) months.
3. Proposed service expansions and reductions including all routing and timetable changes remaining in effect after 12 months that exceed 20 percent of their current configurations.

If a proposed major service change falls within one of the three categories above, MBL will conduct a Title VI service and fare equity analysis for review and consideration by the City of Montebello Council and the public prior to implementing such changes. Proposed system-wide changes are then prepared in staff reports for City Council consideration. Public comments and City Council input formulate the administrative policies that provide equal accessibility and distribution of services to all riders.

An adverse effect is defined as a major geographical or time-based reduction in service which may include, but is not limited to, span of service changes, frequency changes, route segment

elimination, re-routing, or route elimination. MBL shall consider the degree of adverse effects in the form of an equity analysis when planning major service changes.

The following types of service changes are exempt:

- Minor route alignment, frequency, span, or time point adjustments;
- Routing or bus stop changes due to temporary road detours caused by construction, maintenance, closures, emergencies, labor disruptions or strikes, fuel shortages, or safety concerns;
- Any temporary service addition, change, or discontinuation of a route with less than twelve months of operation;
- Changes on special service routes serving sporting events, special events, or service contracted through other cities or agencies;
- Any service change that does not meet the definition of a major service change described above.

Notwithstanding the considerations specified above, there were no major service changes that occurred during the past three years. Moreover, MBL does not anticipate service changes over the next three years that will affect greater than 20% of service hours on any given route. However, if the situation were to change in the future, MBL would abide by all requirements relative to Title VI regulations (49 CFR part 21).

MBL management and planning staff hold monthly and weekly staff meetings to discuss service recommendations. Overall benefits, costs, and fair distribution of services are determined at the planning and programming stages. Proposed system-wide changes are then prepared in staff reports for City Council consideration. Public comments and City Council input formulate the administrative policies that provide equal accessibility and distribution of services to all riders.

Disparate Impact Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service or fare change are borne disproportionately by minority populations. For the purpose of this policy, a minority population is defined as any readily identifiable group of minority persons who live in geographical proximity, and if circumstances warrant, geographically dispersed / transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy, or activity.

MBL defines a “disparate impact” as occurring when an adverse effect of a major service or fare change on minority populations is at least 20 percent greater than the adverse effect on non-minority populations. In order to identify a potential impact, MBL will follow the process within the flow chart illustrated in Appendix H.

To that end, if a proposed major service change would result in a disparate impact, MBL will consider modifying the proposed change to avoid, minimize, or mitigate the disparate impact of the change. If MBL finds potential disparate impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate potential disparate impacts, MBL will reanalyze the

proposed changes in order to determine whether the modifications actually removed the potential disparate impacts of the changes. If MBL chooses not to alter the proposed changes, MBL may implement the service or fare change if there is substantial legitimate justification for the change and MBL can show that there are no alternatives that would have less impact on the minority population and would still accomplish program goals.

Disproportionate Burden Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service or fare change are borne disproportionately by low-income populations.

Low-income population is defined as any readily identifiable group or households who are at or below 150 percent of the U.S. Department of Health and Human Services Poverty Guidelines in Figure 2 below.

Figure 2: 2013 Poverty Guidelines

2013 POVERTY GUIDELINES FOR THE
48 CONTIGUOUS STATES AND THE
DISTRICT OF COLUMBIA

Persons in family/household	Poverty guideline
1	\$11,490
2	15,510
3	19,530
4	23,550
5	27,570
6	31,590
7	35,610
8	39,630

For families/households with more than 8 persons, add \$4,020 for each additional person.

Source: Department of Health and Human Services, Office of the Secretary, Annual Update of the HHS Poverty Guidelines (Federal Register / Vol. 78, No. 16 / Thursday, January 24, 2013 / Notices)

MBL defines a “disproportionate burden” as occurring when the low-income population adversely affected by a major service or fare change is 20 percent more than the average low-income population of MBL’s service area. Similar to the approach in identifying a potential disparate impact, should a proposed major service or fare change result in a disproportionate burden, MBL will consider modifying the proposed change to avoid, minimize, or mitigate the disproportionate burden of the change. If MBL finds potential disproportionate burdens and then modifies the proposed changes in order to avoid, minimize, or mitigate potential disproportionate burdens, MBL will reanalyze the proposed changes in order to determine

whether the modifications actually removed the potential disproportionate burdens of the changes.

If MBL chooses not to alter the proposed changes, MBL may implement the service or fare change if there is substantial legitimate justification for the change and MBL can demonstrate that there are no alternatives that would have less impact on the low-income population and would still accomplish program goals.

Information Dissemination

City staff disseminates bi-lingual information in advance of public meetings to allow for agendas to be prepared and made available for public review in community libraries and at Montebello City Hall. Public notices regarding public hearings are advertised in both English and Spanish newspapers, as well as posted at public facilities. Pamphlets are available on all buses, at Montebello City Hall, libraries and at several large retail centers (e.g., *The Shops at Montebello*). Outreach is also conducted with community groups at senior citizen centers, senior housing complexes, local school districts and other community venues; and notices are distributed to MBL patrons.

CONCLUSION

MBL is committed to its mission “*To provide superior transportation services to Montebello and surrounding communities.*” Further, the agency understands the need to align the mission with stated goals and objectives. In addition, MBL must accomplish said goals within the framework of established FTA regulations, in particular Title VI. MBL strives to promote fiscal responsibility and a culture of integrity, cultivates a work environment that fosters performance and high morale; and consistently works to enhance customer service. In doing so, MBL employees are focused and effective which leads to increased operational efficiency, higher revenues, sustained public trust and confidence while fulfilling community interests and needs; and accomplishing the mission of the organization.

APPENDIX A**Title VI Notice of Rights**

Montebello Bus Lines 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 protected by Title VI of the Civil Rights Act of 1964, as amended.

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

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

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The Title VI Complaint Form may be printed from the www.rideMBL.com website or may also be requested from MBL Customer Service at (323) 558-1625. The Complaint Form is also available for pickup at the Department of Transportation, 400 S. Taylor Avenue, Montebello; or 1600 W. Beverly Boulevard, Montebello. The complaint should include the following information:

1. Complainant's name, address, and how to contact you (i.e., telephone number, email address, etc.)
2. Description of how, when, where, and why complainant believes the discrimination occurred. In addition, the location, names, and contact information of any witnesses should also be included.

The completed form must be returned to:

Montebello Bus Lines
Attention: Transit Operations Manager
400 S. Taylor Avenue
Montebello, CA 90640
(323) 558-1625

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

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105-1839.

Complainants may also file a Title VI complaint with an external entity such as the Department of Justice, other Federal or State agency, or a Federal or State court. However, should a complaint be filed with MBL and an external entity simultaneously, the external complaint will supersede the MBL complaint and MBL's complaint procedures will be suspended pending the external entity's findings.

APPENDIX B

TITLE VI COMPLAINT FORM

Montebello Bus Lines 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 protected by Title VI of the Civil Rights Act of 1964, as amended.

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

If you believe you have been discriminated against, you may file a signed written complaint within 180 days from the date of the alleged discrimination. The Title VI Complaint Form may be printed from the www.rideMBL.com website or may also be requested from MBL Customer Service who can be reached at (323) 558-1625. The Title VI Complaint Form is also available for pickup at the Department of Transportation, 400 S. Taylor Avenue, Montebello. The completed form must be returned to Montebello Bus Lines, Transit Operations Manager, 400 South Taylor Avenue, Montebello, CA 90640.

Your Name: _____

Street Address, City, State, Zip Code: _____

Telephone Number: _____

Name of person discriminated against (if someone other than complainant): _____

Street Address, City, State, Zip Code: _____

Date of Incident: _____

Please describe the alleged discrimination incident. Provide the names and titles of all Montebello Bus Lines employees involved if available. Explain what happened and whom you believe was responsible. If necessary use back of this form.

APPENDIX C

PUBLIC PARTICIPATION PLAN

INTRODUCTION AND PURPOSE

As a recipient of Federal Transit Administration (FTA) funds, the City of Montebello is required to adhere to the Title VI regulation (49 CFR part 21) and to integrate into its Title VI Program considerations expressed in the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibility to Limited English Proficient Persons (70 FR 74087, December 14, 2005). The revised Circular states that transit providers which operate 50 or more fixed-route vehicles in peak service and are located in urbanized areas (UZA) of populations of 200,000 or greater must approve a Public Participation Plan.

Accordingly, Montebello Bus Line's (MBL) Public Participation Plan strives to promote public involvement in transit planning decision-making activities. This plan establishes formal procedures that allow for, encourage, and monitor public participation within the MBL service area including, but not limited to, minority individuals, persons with Limited English Proficiency (LEP), and low-income populations. This document describes proactive public outreach strategies and procedures.

GOALS AND OBJECTIVES

The goal of the MBL Public Participation Plan is to offer a variety of opportunities for the general public to engage in transit planning and decision-making activities in accordance with FTA Circular 4702.1B Chapter III-5 Promoting Inclusive Public Involvement. The objectives of the plan are as follows:

- To determine what non-English languages and / or other barriers may exist to public participation within the MBL service area.
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the MBL service area.
- To hold meetings in locations that are accessible and reasonably welcoming to all area residents, including, but not limited to, minority, LEP, and low-income members of the public.
- To utilize a variety of communication methods to capture public input from populations that are typically not likely to attend or engage in public meetings.

IDENTIFICATION OF STAKEHOLDERS

Stakeholders are those individuals who are either directly or indirectly affected by a plan, project, or program based on decisions related to recommendations or implementation actions. Those individuals 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.

General stakeholders within the MBL service area include, but are not limited to:

- All thirteen (13) cities and unincorporated communities
- Community Partners
- Major Employers
- Major Colleges, Universities, and School Districts
- Metrolink
- Montebello Bicycle Coalition
- Montebello City Commissions (Traffic and Safety, Planning, and Culture and Recreation)
- Montebello Chamber of Commerce
- Non-profit and private business community
- Other regional and municipal transit providers such as the City of Commerce Transit, Foothill Transit, Los Angeles Metropolitan Transportation Authority, and Norwalk Transit
- Public (including minority, LEP, and low-income populations)
- Southern California Association of Governments (SCAG)
- Transit Advocates (Los Angeles Marketing Exchange and Gateway Cities Transit Providers)

In the City of Montebello, MBL provides demand response Dial-A-Taxi Services for the elderly and disabled which complements MBL’s fixed-route services. Additionally, MBL also participates in the mandated para-transit transportation program for Los Angeles County provided by ACCESS Services, a local public entity established to meet the Americans with Disabilities Act (ADA). MBL staff may also periodically meet with social service providers, transit advocates, public members, and other agencies as necessary.

DIRECT STAKEHOLDERS

According to the U.S. Census Bureau, 9,818,605 residents exist within Los Angeles County area as depicted in the Table 1 below:

Table 1: Demographic Profile for Los Angeles County

Category	Number	Percentage of
Total	9,818,605	100%
Hispanic / Latino	4,687,889	47.7%
White	4,936,999	50.3%
African American	856,874	8.7%
Native American / Alaskan Native	72,828	0.7%
Asian	1,346,865	13.7%
Native Hawaiian and Pacific Islander	26,094	0.3%

2% of the population identifies as two or more races.

Source: U.S. Census Bureau, 2010 Census

Techniques utilized to engage the general population includes public notices of meetings in the local newspapers, on the MBL website, social media, written and oral announcements at City of Montebello Council meetings, and community meetings. Further, with the imminent installation of an innovative intelligent transportation system, MBL will strive to proactively engage members of the public with other cost-effective approaches utilizing a broad range of electronic messaging techniques.

MINORITY POPULATIONS

As indicated in Table 1 referenced above, minority populations comprise almost half of the percentage of the population in Los Angeles County. Hispanic / Latino individuals are the largest minority, with 47.7 percent of the total population. Asian and African American persons account for 13.7 percent and 8.7 percent of the population, respectively. A small number of Native American / Alaska Natives and Native Hawaiian and Pacific Islander individuals account for less than 1 percent each. Persons who consider themselves to be of more than one race account for 2.0 percent of the population.

LIMITED ENGLISH PROFICIENCY POPULATIONS

Consistent with MBL'S Limited English Proficiency (LEP) Policy and newly incorporated Language Assistance Plan, reasonable efforts will be made to engage LEP populations utilizing techniques such as the development of public notices in appropriate non-English languages that will provide contact information where individuals can be informed of the affected project or services to provide input or comments. Other efforts may include conducting focus groups in concentrations of LEP populated areas for the purpose of gaining input from a particular defined portion of the community. In addition, non-profit organizations and other advocacy groups can be utilized to disseminate information to LEP populations. Such non-profit organizations, advocacy groups, or other organizations can provide insight into the needs of LEP populations.

LOW-INCOME POPULATIONS

To ensure that low-income households are not under-served, MBL will identify populations within the service area with a per capita income of 80 percent or less of the national average in order to establish low income thresholds. Low-income populations in the MBL service area should be given every reasonable opportunity to provide input on transportation plans and programs to avoid disproportionate harm; or lack of benefit of transportation programs and projects.

In summary, methods of gaining input either directly or indirectly from minority, LEP, and low-income population groups include a wider range of notification techniques, focus group meetings or informal interviews, if required; and the use of agency or advocacy group contacts through non-profit or private organizations.

PUBLIC COMMENT PROCESS FOR MAJOR SERVICE AND FARE CHANGES

In addition to the outreach efforts identified earlier in this plan, MBL will utilize the City of

Montebello Council meetings to announce proposed major changes to services and fares. Accordingly, the public will be notified of proposed major service or fare changes resulting in increases or decreases as well as identified potential disparate or disproportionate burden impacts. In addition, public comments will be presented to the City of Montebello Council prior to approval of the proposed major service or fare change.

The following procedures, strategies, techniques, and media will be utilized to engage and notify the public in the public hearing process prior to the City of Montebello Council approval:

- Place printed materials on buses: interior cards, flyers, and / or comment cards describing the proposed changes.
- Information available on website.
- Social media outlets: email blasts, Facebook, Twitter.
- Press releases and meetings with local media representatives.
- Presentations to professional, citizen, and student organizations.
- User and non-user surveys.
- Use of various illustrative visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, maps, and the Internet.

CONCLUSION

This document will serve as the *Public Participation Plan* for MBL. The plan is available for review on the MBL website, www.rideMBL.com, and at the Department of Transportation Facility. If materials are requested in LEP languages, large type, and / or Braille, staff will make a reasonable attempt to accommodate those needs.

Members of the public can also obtain information about the plan by contacting MBL Customer Service by phone at (323) 558-1625; or via U.S. Postal Service: Montebello Bus Lines, Transit Operations Manager, 400 South Taylor Avenue, Montebello, CA 90640.

APPENDIX D**LIMITED ENGLISH PROFICIENCY (LEP) POLICY AND IMPLEMENTATION PLAN****LIMITED ENGLISH PROFICIENCY (LEP) POLICY**

Pursuant to Title VI of the Civil Rights Act of 1964 (Title VI), the U.S. Department of Transportation (DOT) implementing regulations, and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)”, Montebello Bus Lines (MBL) is federally mandated to develop and implement a Language Assistance Plan by which Limited English Proficiency (LEP) persons are able to meaningfully access translations of written and oral information; and to ensure that no person shall be discriminated against relative to services that MBL furnishes on the basis of race, color, or national origin.

A LEP person is defined as an individual limited by the ability to speak English less than “very well” or “not at all” as reported by the U.S. Census Bureau (Census). As MBL is a Federal Transit Administration (FTA) recipient receiving Federal financial assistance, MBL must take reasonable steps to ensure meaningful access to the benefits, services, information, and other relevant aspects of its programs and activities for LEP persons.

Four Factor Analysis

MBL conducted an analysis to meet requirements pursuant to Title VI which seeks to improve access to services for LEP persons; more importantly, to gauge MBL’s effectiveness in communicating with LEP persons. In September of 2012, a linguistics analysis was conducted with Census Year 2010 tract level data. One Census Year 2010 data file was employed, which included language groups and their English proficiency; and the number of speakers per specific language. The data from this file formed the basis for the analysis.

The total number of persons per language group was identified along with those individuals in each language group who stated they could speak English “less than very well.” To better identify those language groups with limited English proficiency that constituted a significant number of persons in the service area, a threshold of 1% of the total population of individuals five (5) years and older was established to reveal which languages should be the focus of any specific outreach.

The results identified five specific language groups with some limited English proficiency that crossed the established population threshold. These languages were Spanish; the Chinese dialects of Mandarin and Cantonese; Korean; and Vietnamese as highlighted in Table 1 below. Moreover, Table 1 indicates the number of persons in each language group, and the number of persons that speak English “less than very well”.

Table 1: Languages and English Proficiency in MBL Service Area

Montebello Bus Lines Service Area Languages				
Total Population 5 Years and Older – 715,816				
Language Group	Total in Language Group	Percent of Total Population	Speak English “less than very well” in Language Group	
			Number	Percent of Language Group
English	216,579	30%		
Spanish	374,141	52%	170,250	46%
Indo-European	10,931	2%	3,955	36%
• <i>French/Cajun</i>	840		114	
• <i>French/Creole</i>	18		0	
• <i>Italian</i>	767		350	
• <i>Portuguese</i>	324		89	
• <i>German</i>	817		150	
• <i>Yiddish</i>	56		16	
• <i>West Germanic</i>	137		29	
• <i>Scandinavian</i>	206		46	
• <i>Greek</i>	466		229	
• <i>Russian</i>	683		401	
• <i>Polish</i>	252		85	
• <i>Croatian</i>	211		33	
• <i>Slavic</i>	173		27	
• <i>Armenian</i>	2,717		1,270	
• <i>Persian</i>	505		241	
• <i>Gujarathi</i>	583		214	
• <i>Hindi</i>	573		128	
• <i>Urdu</i>	381		203	
• <i>Other Indic</i>	889		192	
• <i>Other Indo-European</i>	333		138	
Asian/Pacific Islander	112,340	16%	71,465	64%
• <i>Mandarin Chinese</i>	35,474		23,854	
• <i>Cantonese Chinese</i>	33,812		22,735	
• <i>Japanese</i>	4,751		2,798	
• <i>Korean</i>	11,127		7,492	
• <i>Cambodian</i>	1,627		1,062	
• <i>Miao Hmong</i>	6		0	
• <i>Thai</i>	1,895		1,227	
• <i>Laotian</i>	298		155	
• <i>Vietnamese</i>	11,811		7,845	
• <i>Other Asian</i>	1,518		918	
• <i>Tagalog</i>	8,120		2,604	
• <i>Other Pacific Islander</i>	1,910		775	
All Other Languages	1,825	Less Than 1%	611	34%

Source: U.S. Census Bureau, American Community Survey 2010

Given the total population in the Montebello Bus Lines service area that is five (5) years old and above (715,816 persons), and using the 1% population threshold of persons for any language group that had limited English proficiency, those languages that had more than 7,158 persons with limited English proficiency were Spanish (170,250 persons); Mandarin Chinese (23,854 persons); Cantonese Chinese (22,735 persons); Korean (7,492 persons) and Vietnamese (7,845 persons)¹.

With respect to the “Four-Factor Analysis” as specified in the DOT LEP Guidance Handbook, MBL initiated the following:

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Task 1, Step 1: Examine MBL’s prior experience with LEP individuals.

MBL serves a number of communities which are comprised of a diverse population; accordingly, the agency is very experienced with LEP individuals. Operations and customer service staff report daily interactions with LEP persons, particularly individuals speaking Spanish as their primary language, followed by Chinese. The majority of interactions with LEP persons are requests for information relative to the use of transit services, including route, schedule, fare, and transfers. MBL also frequently receives requests from LEP individuals regarding its Dial-A-Taxi services.

Task 2, Step 1: Become familiar with data from the U.S. Census for relevance to MBL LEP Policy and Implementation Plan.

The U.S. Census 2011 American Community Survey (ACS) describes the languages spoken in Los Angeles County and the respective number speaking each language as identified in Table 2 below:

¹ U.S. Census Bureau, American Fact Finder, Census 2010, American Community Survey:
<http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

Table 2: Language Spoken at Home for the Population Five (5) Years and Over in Los Angeles County

Language Spoken	Number of Speakers
English Only	9,240,851
Spanish	3,977,701
Chinese	355,907
Tagalog	224,629
Korean	183,117
Armenian	179,073
Vietnamese	76,387
Persian	75,700
Japanese	53,725
Russian	49,168
Arabic	38,866
Other	5,185

Source: U.S. Census Bureau, American Community Survey 2011

As indicated, the most significant non-English populations speak Spanish and English.

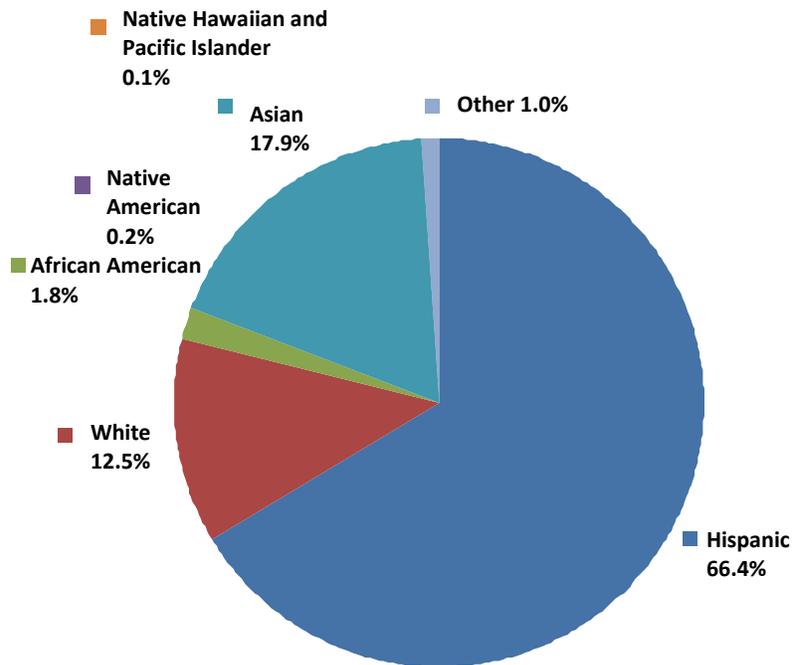
Task 2, Step 2: Identify the geographic boundaries of the area that the agency serves.

MBL services a relatively diverse population in several neighboring cities. Specifically, MBL currently serves over 8 million passengers a year throughout the communities of Alhambra, Bell Gardens, Boyle Heights, Commerce, Downtown Los Angeles, East Los Angeles, La Mirada, Montebello, Monterey Park, Pico Rivera, Rosemead, San Gabriel, San Marino, South Gate and Whittier. The most prominent minority populations in MBL’s service area are Hispanics and Asians. The MBL System Map, Figure 1, reflects all MBL transit lines and service areas.

Task 2, Step 3: Obtain census data on the LEP population in MBL’s service area.

As previously stated, MBL services a relatively diverse population throughout several communities. The majority of the population served by MBL is Hispanic, accounting for 66.4% of the population. Asians represent 17.9% and Caucasians account for 12.5% of the population. The remaining ethnicities are reflected in Figure 2, System Racial Distribution.

Figure 2: System Racial Distribution



Source: 2010 American Community Survey

The communities which comprise the MBL service area encompass the ethnicities as reflected in Table 3 below:

Table 3: Racial Distribution Chart.

City/Ethnicity	White	African Am.	Hispanic	Asian	Native Am.	Other
Alhambra	9.3%	1.3%	34.0%	53.7%	0.2%	1.5%
Bell Gardens	2.3%	0.5%	96.1%	0.6%	0.2%	0.3%
Commerce	3.2%	1.1%	93.7%	1.1%	0.4%	0.5%
La Mirada	36.1%	2.1%	40.9%	18.2%	0.3%	2.4%
Los Angeles	28.6%	8.7%	48.9%	11.3%	0.2%	2.3%
Montebello	8%	0.6%	80.1%	10.5%	0.1%	0.6%
Monterey Park	4.5%	0.4%	26.4%	67.3%	0.1%	1.3%
Pico Rivera	4.7%	0.6%	91.7%	2.4%	0.2%	0.4%
Rosemead	3.9%	0.2%	32.3%	62.7%	0.1%	0.8%
San Gabriel	10.2%	0.9%	24.6%	62.8%	0.1%	1.4%
Santa Fe Springs	10.4%	1.9%	82.5%	3.9%	0.3%	1.0%
South Gate	2.9%	0.6%	95.3%	0.7%	0.1%	0.4%
Vernon	52.2%	5.5%	40.5%	1.8%	0.0%	0.0%
Whittier	26.0%	0.9%	67.9%	3.8%	0.2%	1.2%

Source SCAG 2013, Local Profiles of SCAG Member Jurisdictions

Task 2, Step 4: Analyze the data that has been collected.

Based on the data reflected in Tables 1 and 2, a total of 4,892,965 persons (53%) are identified with limited English proficiency. Of these persons, 3,651,208 speak Spanish, 355,907 speak Chinese, 183,117 speak Korean and 179,073 speak Armenian.

Task 2, Step 5: Identify any concentrations of LEP within the MBL service area.

Again, MBL services a diverse population. The following census tracts (Figures 3 – 8) highlight those communities and census tracts in which most of the population of persons with limited English proficiency resides. Census tracts in which residents spoke Spanish with limited English proficiency are primarily located in the western portion of the Montebello Bus Lines service area from Pico Rivera and Bell Gardens to Downtown Los Angeles. Census tracts in which Mandarin and Cantonese dialects are spoken by persons with limited English proficiency are located in the northern portion of the service area in Montebello, Monterey Park, Rosemead and into the Pasadena area. Limited English speaking residents of the Montebello Bus Lines service area that speak Korean are concentrated around La Mirada, Downey, Rosemead, Monterey Park and into the Downtown Los Angeles area. Concentrations of Vietnamese speaking persons reside near the City of Santa Fe Springs and in the northern portion of the service area in the cities of Montebello, Alhambra and Rosemead.

Figure 3: English Language by Census Tract

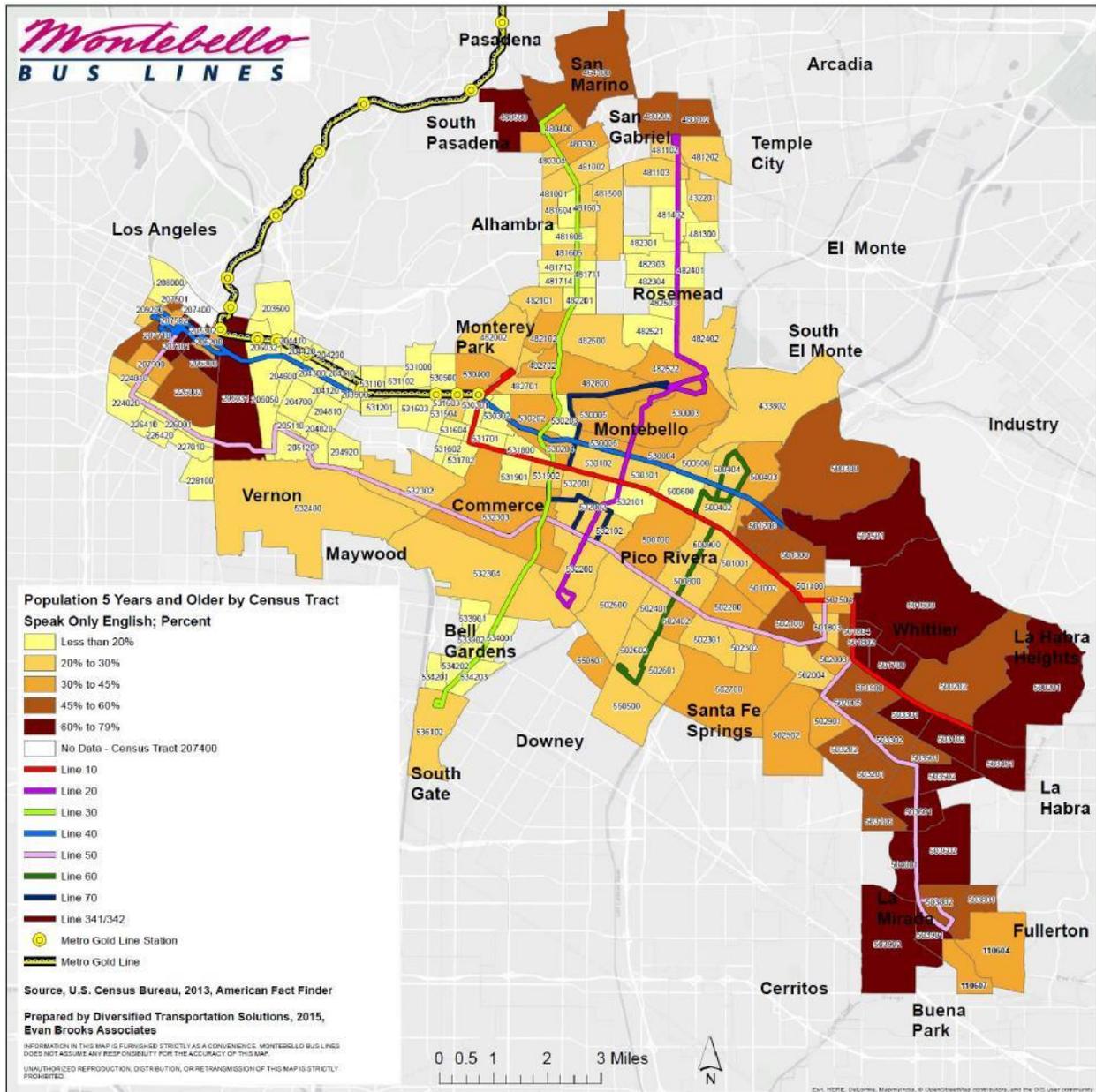


Figure 4: Spanish Language by Census Tract

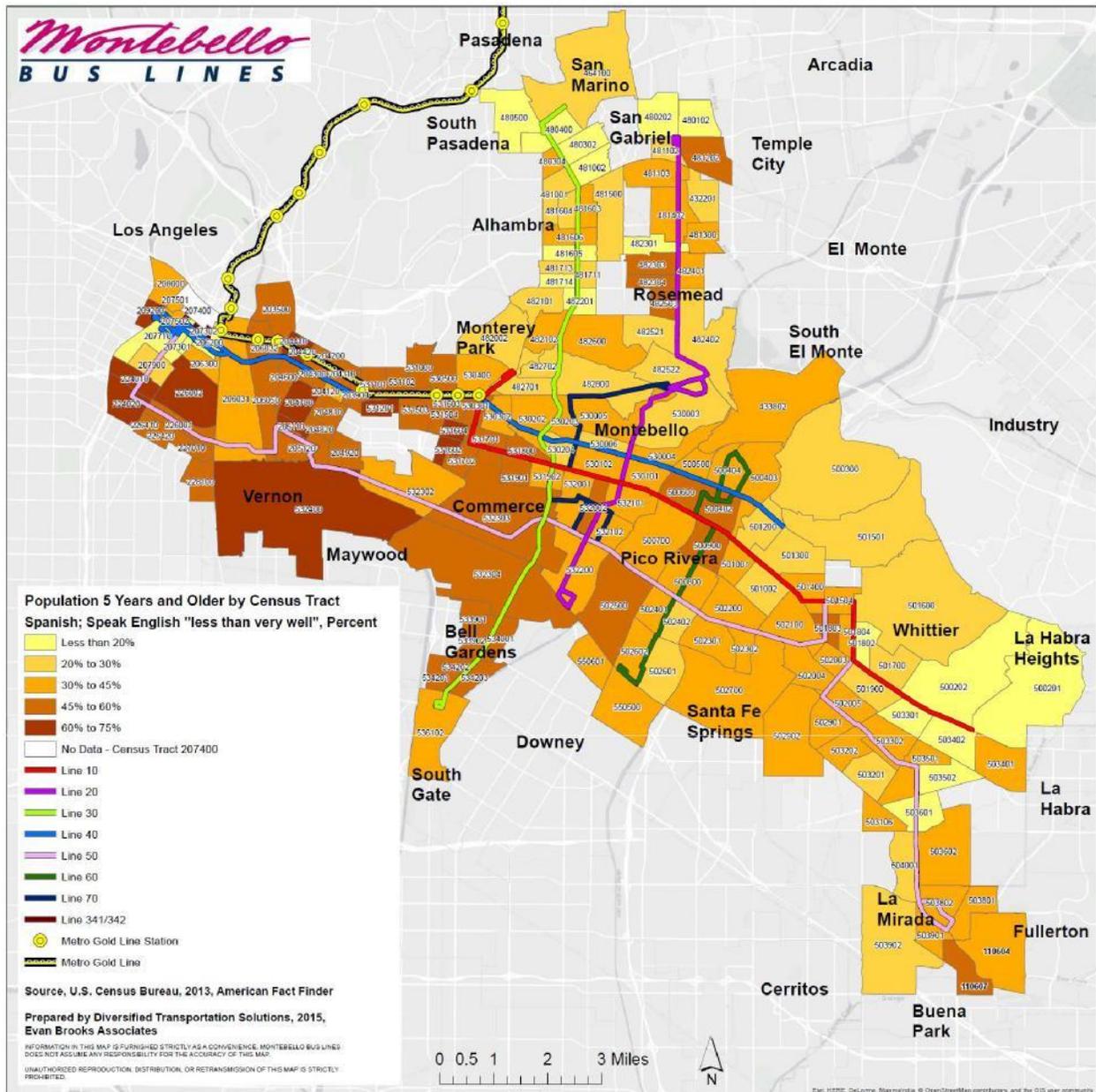


Figure 6: Cantonese Language by Census Tract

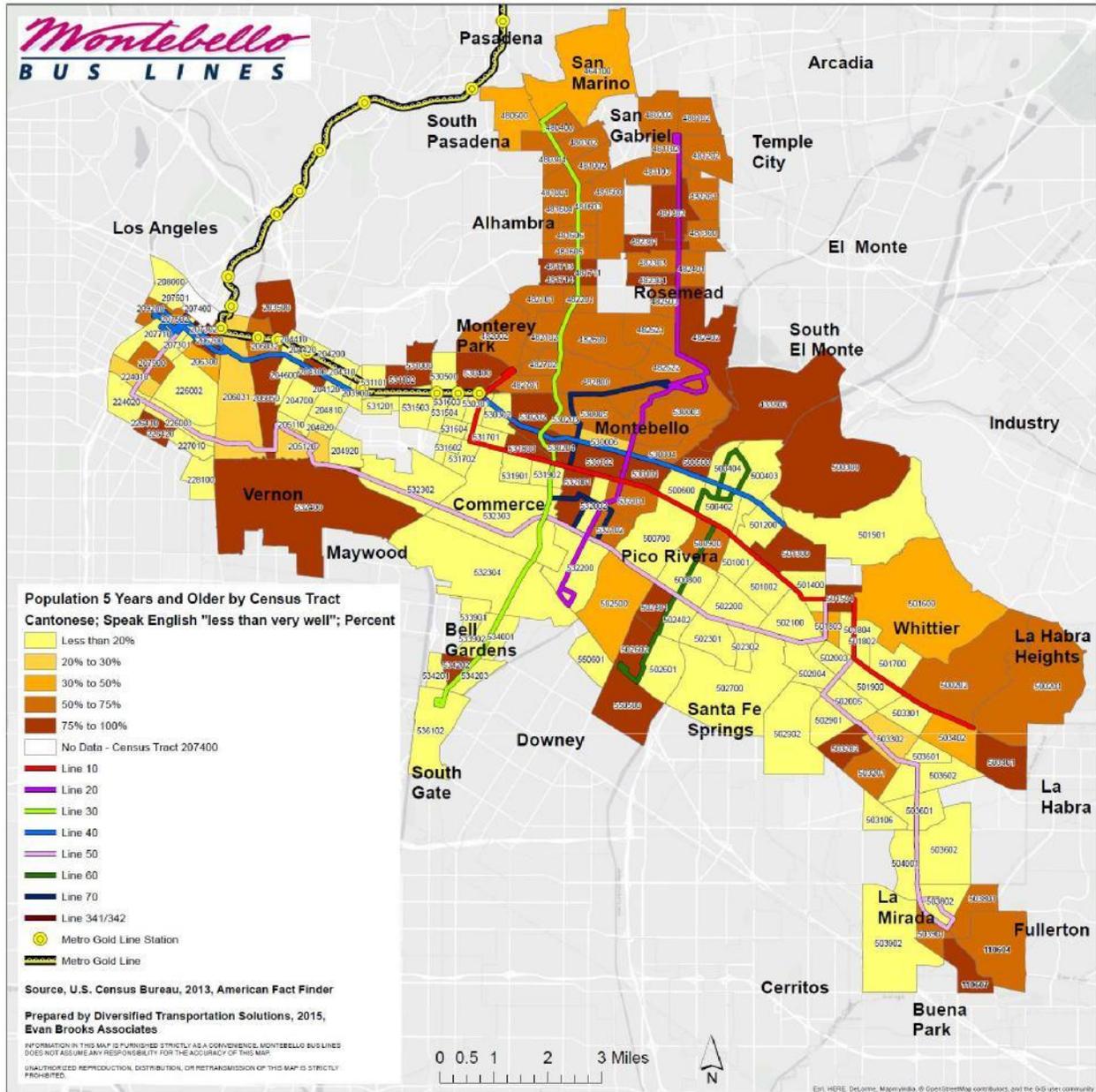


Figure 7: Korean Language by Census Tract

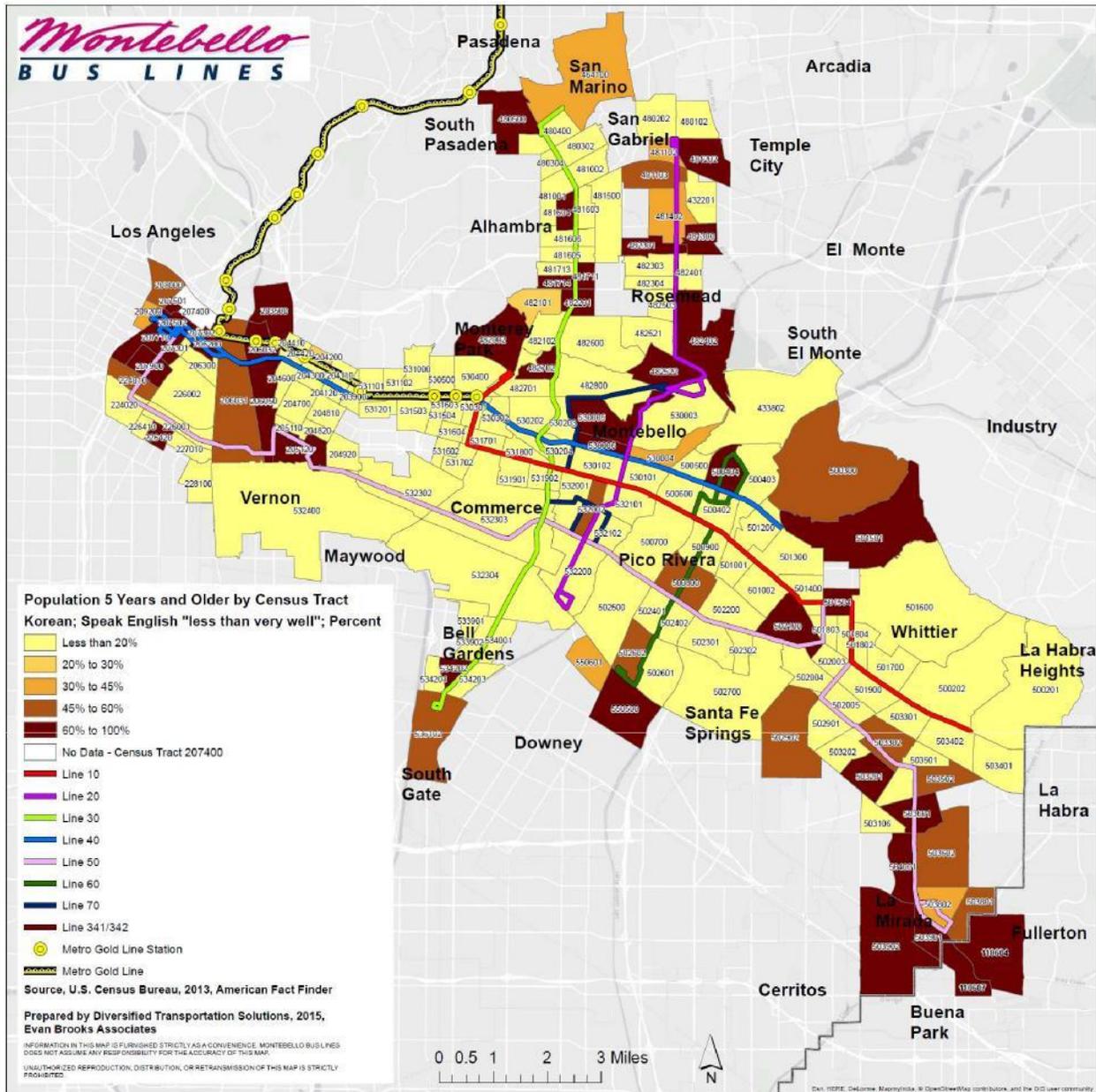
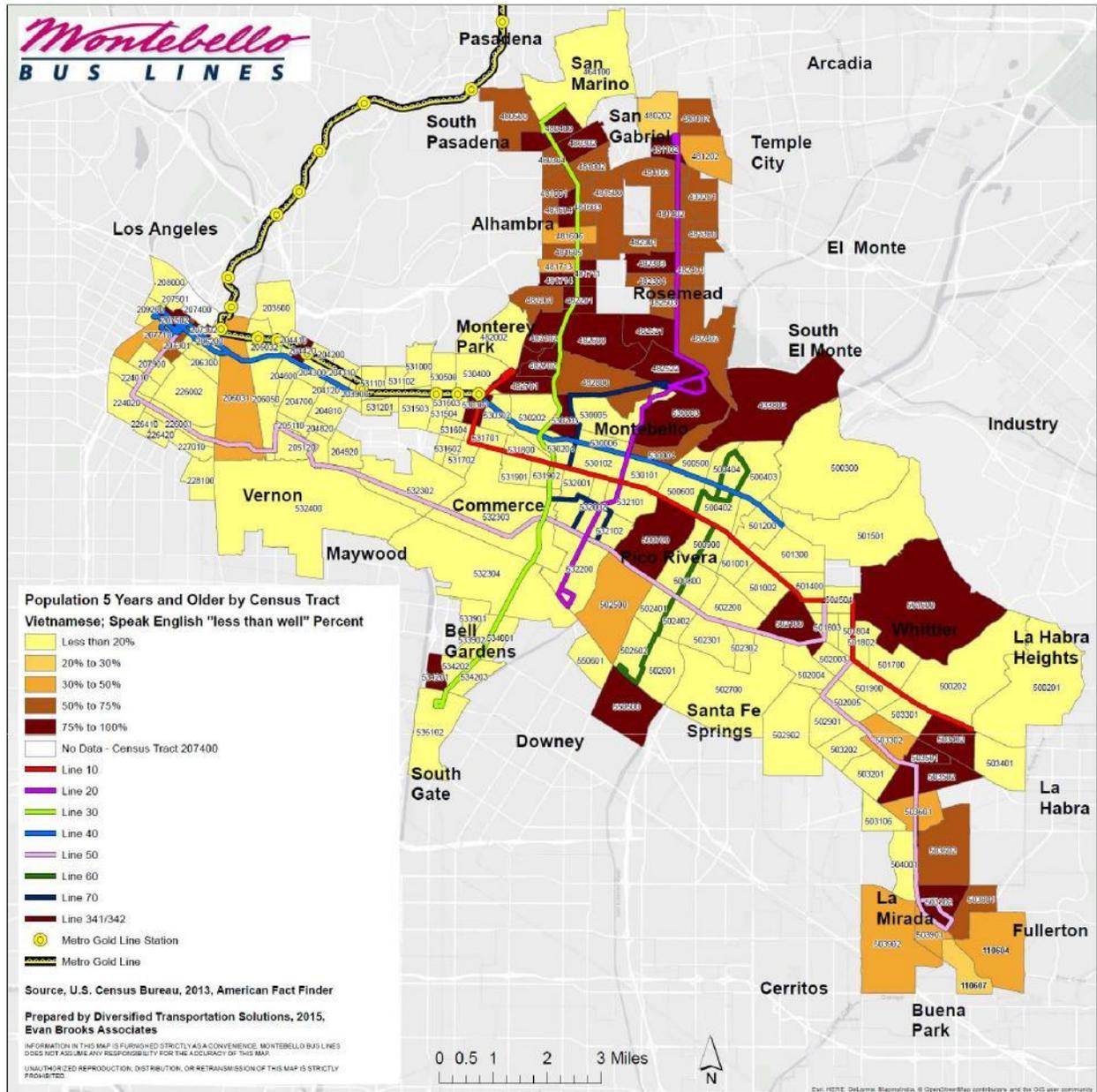


Figure 8: Vietnamese Language by Census Tract



Factor 2: The frequency with which LEP individuals come into contact with MBL's programs, activities, and services.Task 1, Step 1: Review the relevant programs, activities, and services provided by MBL.

Operational services include fixed-route services, express bus services, Dial-A-Taxi program, and the Montebello Link shuttle service. LEP individuals inquire about these programs and services on a daily basis by telephoning MBL customer service staff, as well as the dispatch center.

To ensure that information relative to the services provided is made available to LEP customers, and that staff respond to inquiries, MBL has implemented the following measures:

- Public Information – MBL's Route Brochures, which provide scheduling, route and fare information; Rider Alerts; Surveys and Public Notices are published in a bi-lingual format (English/Spanish).
- Customer Service Center – Bi-lingual staff are available to answer questions or accept comments related to MBL transportation services; bus fares and discounted fare information; lost and found; Montebello Link shuttle services, and Dial-A-Taxi services. Sales of bus tokens, EZ Passes, Student Monthly Passes, and Dial-A-Taxi coupons are also offered. The Customer Service Center may also assist with trip planning and logging complaints.
- Community Partners – MBL has established partnerships for purposes of purchasing MBL tokens and monthly passes with various community businesses both within city boundaries, as well as in the neighboring communities to promote ridership and facilitate ease of ticketing.
- Fare and Service Change Information – Notices regarding public outreach meetings and hearings on fare and / or service changes are published in English and Spanish newspapers; and all customer comments are welcomed by MBL.

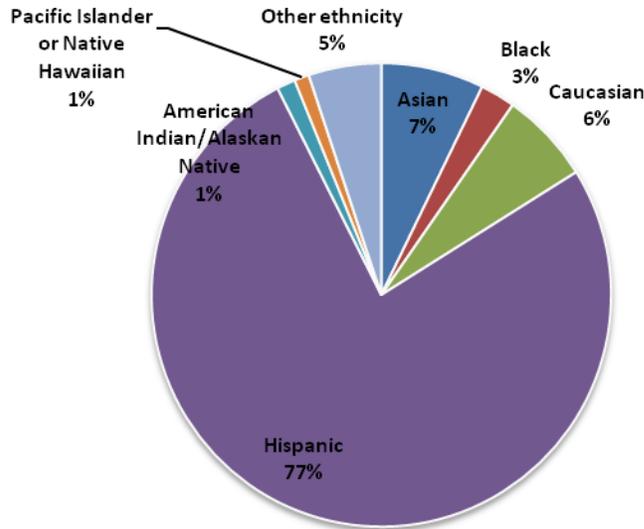
Task 2, Step 1: Review information obtained from community organizations.

LEP persons are served by many organizations in Montebello and surrounding communities, including various school districts, governmental agencies, churches and other community organizations. MBL works closely with said organizations to promote transit services; and also routinely has bi-lingual community outreach programs to facilitate this endeavor relative to LEP individuals. Other efforts may include conducting focus groups in concentrations of LEP populated areas for the purpose of gaining input from a particular defined portion of the community. In addition, non-profit organizations and other advocacy groups can be utilized to disseminate information to LEP populations. Such non-profit organizations, advocacy groups, or other organizations can provide insight into the needs of LEP populations.

Task 2, Step 2: Review information obtained from community organizations.

MBL conducted an on-board passenger survey in August and September of 2011 as part of its most recent line-by-line analysis. The results revealed that the MBL bus riders are largely of Hispanic ethnicity as indicated in Figure 2 below:

Figure 9: Ethnicity of Survey Respondents



In addition, MBL also conducted a telephone survey of residents in the service area. A total of 405 interviews were conducted in English and Spanish based on a random sampling of residents in the cities of Montebello, Pico Rivera, Monterey Park and Whittier. The majority of the respondents (71%), which were predominantly Hispanic, had heard of MBL as a local transit provider. MBL will continue to engage its patrons by employing a variety of techniques such as public notices of meetings in the local English and Spanish newspapers, on the MBL website, social media, written and oral announcements at City of Montebello Council meetings, and community meetings

Factor 3: The nature and importance of the program, activity, or service provided by MBL

Task 1, Step 1: Identify the most critical services.

MBL’s most critical services include fixed-route transit, Dial-A-Taxi program, and the Montebello Link shuttle service. As previously indicated, LEP individuals inquire about these programs and services on a daily basis. MBL makes every effort to ensure that information relative to these services is made available to LEP customers and that staff respond accordingly to all inquiries.

Task 1, Step 2: Determine if additional services are needed to provide meaningful access.

MBL's is fully cognizant that public transportation is often the primary means of achieving mobility for many LEP persons. As such, MBL strives to provide language assistance to such individuals in a competent and effective manner to ensure that transit services are safe, reliable, convenient, and accessible to those persons. Moreover, MBL makes an effort to improve mobility within its service area by providing transportation services in an equitable manner to all segments of society. MBL emphasizes the fair treatment of people of all races, cultures, and income levels, including minority and low income populations; and works diligently to perfect the passenger experience.

Factor 4: The resources available to the recipient for LEP outreach, as well as the associated costs.

Task 1, Step 1: Inventory language assistance measures currently being provided, along with associated cost.

MBL has many authorized bi-lingual employee in Operations, including Customer Service, and Administration. Each employee is paid \$70 per month for the bi-lingual service. In addition, MBL publishes route brochures, which provide scheduling, route and fare information; Rider Alerts; Surveys and Public Notices in a bi-lingual format (English / Spanish). The employee costs, coupled with the printing / publication services, are approximately \$100,000 annually.

Task 1, Step 2: Determine what, if any, additional services are needed to provide meaningful access.

The recent addendum to the *Line-By-Line Analysis of Transit Services and Market Survey* indicated that consideration should be given to the addition of Korean and Vietnamese languages into the population threshold for language groups with limited English Proficiency. MBL is presently exploring options in this regard; however, the Hispanic population (Spanish speaking) remains the largest percentage of MBL riders and information relative to all services is presently published in Spanish as well as English.

Task 2, Step 1: Analyze budget and consider cost effective practices for providing language services.

Consistent with most public agencies, MBL's budget is constrained by several factors and staff resources are limited. However, as MBL has bi-lingual Operations and Administrative staff, costs associated with implementing further LEP measures are limited to staff time, marketing and advertising. MBL prides itself on being resourceful and optimizing efficiency of limited resources. Further, MBL has established partnerships which facilitate cost effective practices in providing translation assistance for LEP persons; channels for distribution of printed information; and educational and outreach opportunities to foster improved access for LEP persons.

LANGUAGE ASSISTANCE PLAN

Under the LEP Policy, the Language Assistance Plan is comprised of various implementation procedures and measures to provide meaningful access translation of written and oral information; and to ensure that no person shall be discriminated against relative to services that MBL furnishes on the basis of race, color, or national origin.

Procedures to Identify an LEP Person in Need of Language Assistance

MBL shall perform a language needs assessment to determine the language demographics of its service area using one or more of the following methods:

- Analyze updated census data to identify the percentage of LEP persons by census tract.
- Utilize ridership surveys from transit planning or marketing studies to identify the percentage of MBL riders that are LEP persons.
- Examine records to see if requests for language assistance have been received in the past and if so, for what language.
- Survey front-line staff such as drivers and customer service staff regarding their experiences concerning any contacts with LEP persons during the previous year.

Research among operations staff, customer service, and administrative staff reveal that the frequency of contact with LEP persons speaking Spanish occurs on a daily basis; contact with Chinese speaking patrons is occasionally. Moreover, MBL's Language Assistance Plan works in conjunction with the Public Participation Plan to engage LEP populations utilizing techniques such as the development of public notices in appropriate non-English languages that will provide contact information where individuals can be informed of the affected project or services to provide input or comments.

Language Assistance Measures

MBL shall perform a language needs assessment to determine the language demographics of its service area using one or more of the following methods:

- MBL Customer Service shall request the assistance of trained interpreters to provide translation for the LEP identified languages upon request.
- Public meeting announcements posted on the MBL website shall be available in English and LEP identified languages.

When written communication is received from a LEP customer, it is forwarded to the MBL Operations Manager who will designate an appropriate staff member to translate and provide a response in the LEP customer's native language. MBL has several authorized bi-lingual employees who are well versed in providing translation services.

Outreach Techniques

If the percentage of LEP persons in a particular census tract is significant or if the ridership surveys reveal a significant percentage of MBL's riders are LEP persons, MBL will identify the primary language(s) of those individuals potentially impacted and implement the following steps:

- Instructional and informational rider materials and passenger notices shall be available in English and in the potentially impacted LEP identified languages within affected communities of the MBL service area.
- All public hearing notices shall be published in an English language newspaper and the LEP identified language newspaper, if available, while following all requirements set forth in the MBL Major Service and Fare Changes Policy.
- All public hearing notices shall contain the following verbiage in English and the LEP identified languages:
 - Comments regarding the proposal may be submitted by phone at (323) 558-1625 or via standard mail to Montebello Bus Lines, Operations Manager, 400 South Taylor Avenue, Montebello, CA 90640.
- Pictographs shall be used on the buses whenever possible to instruct and depict necessary information and procedures.
- General notices stating that language translation assistance is available for LEP identified languages shall be posted on City of Montebello public meeting agendas.
- Information displays at community events where it is likely that significant numbers of LEP persons will attend shall be staffed by at least one person fluent in the LEP identified languages, upon request.
- MBL printed information at an event shall be available in English and the LEP identified languages.
- All customer surveys shall be available in English and in the potentially impacted LEP identified languages within specific communities of the MBL service area.
- All Title VI complaint forms shall be available in English and the LEP identified languages.

Staff Training

Training of MBL's responsibility relative to serving LEP persons is provided during orientation and initial training of new operators. Dispatchers, field supervisors, customer service personnel and management staff also receive ongoing training in this regard. Specifically, the following training shall be provided to MBL staff:

- Information regarding MBL's Title VI Program and LEP responsibilities.
- Information regarding the Title VI complaint forms and procedures; and how to handle a potential Title VI/LEP complaint.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- Use of interpretive services.

Monitoring and Updating the LEP Policy and Language Assistance Plan

The MBL LEP Policy and Language Assistance Plan are designed to be flexible to the needs of the public. On an annual basis, MBL staff shall evaluate the LEP Policy and Language Assistance Plan and, if applicable, propose revisions based on input from the following sources:

- Surveys and studies.
- Formal comments from the public.
- Feedback from customers, community members and MBL staff.
- Input and recommendations from local, State and Federal officials.
- Changes in regulations.

All proposed revisions to the LEP Policy and Language Assistance Plan will be presented to the City of Montebello Council and the public for consideration and approval.

CONCLUSION

This document will serve as the *Limited English Proficiency (LEP) Policy and the Language Assistance Plan*. The plan is available for review on the MBL website, www.rideMBL.com and at the Department of Transportation Facility. If materials are requested in LEP languages, large type, and/or Braille, staff will make a reasonable attempt to accommodate those needs.

Members of the public can also obtain information about the plan by contacting MBL Customer Service by phone at (323) 558-1625; or via U.S. Postal Service: Montebello Bus Lines, Transit Operations Manager, 400 South Taylor Avenue, Montebello, CA 90640.

APPENDIX E

CITY OF MONTEBELLO COUNCIL ACTION ADOPTING TITLE VI PROGRAM

**CITY OF MONTEBELLO
1600 WEST BEVERLY BLVD.
MONTEBELLO, CALIFORNIA**

**JULY 13, 2016
WEDNESDAY
5:40 P.M.**

THE CITY OF MONTEBELLO CITY COUNCIL MET AT THE ABOVE TIME AND PLACE IN A REGULAR SESSION.

OPENING CEREMONIES

- 1. **CALL MEETING TO ORDER:** Mayor A. Barajas called the meeting to order at the hour of 5:40 p.m.
- 2. **ROLL CALL:** City Clerk I. Barajas
MEMBERS PRESENT: Molinari, Hadjinian, Romero, Delgado, Barajas
MEMBERS ABSENT: None
STAFF PRESENT: City Manager Tucker-Schuyler, City Attorney Alvarez-Glasman
- 3. **STATEMENT OF PUBLIC ORAL COMMUNICATIONS FOR CLOSED SESSION ITEMS:** City Attorney Alvarez-Glasman

ORAL COMMUNICATIONS ON CLOSED SESSION ITEMS

None.

Mayor Barajas recessed the meeting into Closed Session at the hour of 5:41 p.m. to discuss the following item. At the hour of 6:17, Mayor Barajas reconvened the meeting.

CLOSED SESSION

The City Attorney provided a briefing on the items listed for Closed Session as follows:

- 4. **CONFERENCE WITH LEGAL COUNSEL - EXISTING LITIGATION**
(Government Code Section 54956.9(d)(1))
Name of Case: Bazua v. City of Montebello

All Councilmembers were present for Closed Session and received a briefing from Special Counsel. No final action. Direction was provided.

REGULAR SESSION

17. APPROVAL AND ADOPTION OF THE TRANSPORTATION DEPARTMENT'S TITLE VI PROGRAM

Councilmember Hadjinian moved, seconded by Mayor Pro Tern Romero to approve and adopt the Transportation Department's Title VI Program in compliance with new requirements. Motion carried unanimously.

ADJOURNMENT

Upon motion carried unanimously, Mayor Barajas adjourned the meeting at the hour of 10:30 p.m., in memory of those lives lost in recent Dallas, Texas shooting.

APPROVAL OF MINUTES: Upon motion carried unanimously, the minutes of July 13, 2016, were approved as written on October 12, 2106.

ATTEST:



IRMA BARAJAS, City Clerk


ART BARAJAS, Mayor

FTA 2016 CERTIFICATIONS AND ASSURANCES

Affirmation of Applicant

Affirmation of Applicant BY SIGNING BELOW on behalf of the Applicant, I declare that I have duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2016, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during federal fiscal year 2016.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 et seq., and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute.

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

I Accept the above

Official's Name Martin Gombert

Certification Date Jul 19, 2016

Affirmation of Attorney

Affirmation of Attorney As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

I Accept the above

Attorney's Name Martin Gombert

Certification Date Jul 19, 2016

APPENDIX G

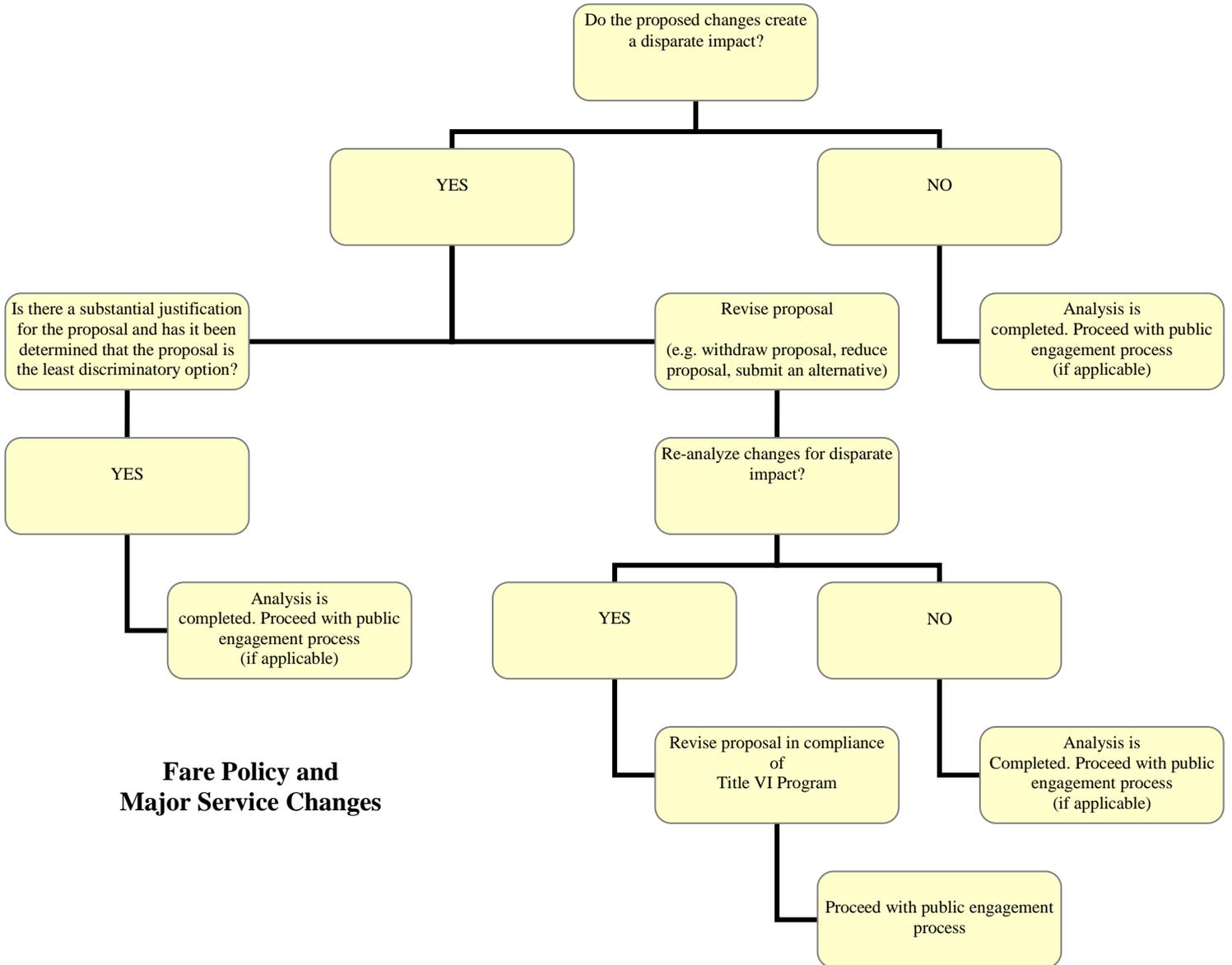
VEHICLE FLEET INVENTORY

April 2015

Year Built	Vehicle Number	Manuf.	Model	Seats	Length	Width	Fuel	Total Owned	Fixed Route Service
2001	2101, 2, 4, 5, 6	Gillig	Low Floor	40	40	102	D	5	5
2001	2107, 8-12, 14	Gillig	Low Floor	40	40	102	D	7	7
2005	2501-2505	New Flyer	Low Floor	38	40	102	Unl	5	5
2008	2801-2815	New Flyer	Low Floor	38	40	102	Unl	15	15
2010	2901-2908	New Flyer	Low Floor	29	35	102	Unl	8	8
2010	2909-2910, 2912-2925	New Flyer	Low Floor	38	40	102	Unl	15	15
2011	21001-21003	New Flyer	Low Floor	38	40	102	CNG	3	3
2011	21101-21104	New Flyer	Low Floor	38	40	102	CNG	4	4
2013	1301-1308	New Flyer	Low Floor	38	40	102	CNG	8	8
TOTAL								70	70

Vehicles 2101, 2102, 2104, 2105, and 2106 are emergency contingency vehicles.

APPENDIX H
TITLE VI DISPARATE ANALYSIS CHART



**Fare Policy and
Major Service Changes**

APPENDIX G

Service Monitoring

Using U.S. Census 2010 data, minority and non-minority census tracts in the Montebello Bus Lines (MBL) service area were identified. For the purpose of the Title VI analysis, the MBL service area was defined as all those census tracts that were within ¼ mile of the current Montebello bus route network. Using this data, a “Level of Service Analysis” and a “Quality of Service Analysis” was performed to determine whether the performance of MBL transit service is consistent with FTA guidelines outlined in Circular 4702.1B Chapter IV.

For the Service Analysis, eighteen census tracts (10% of the 180 total census tracts in the service area) were chosen at random. Nine of the tracts were identified as “Minority” while another nine tracts were identified as “Non-Minority”. Minority census tracts included those tracts in which the minority population in the tract exceeded the percentage of the minority population in the MBL service area (87.3% of residents). Conversely, Non-Minority census tracts were those where the non-minority population in the tract exceeded the non-minority population in the MBL service area (12.5% of residents). Tables 1 and 2 depict all the sampled census tracts within the MBL service area and categorizes them as minority or non-minority, for purposes of conducting both a Level of Service Analysis and a Quality of Service Analysis.

Level of Service Analysis

Average Daily Stop Loads

The Average Weekday Passenger Load Per Stop was calculated for each census tract analyzed. Total weekday passenger loads for MBL buses serving bus stops located within the sampled census tracts were reviewed, with the results compared for Minority and Non-Minority census tracts. Minority census tracts showed average loads of 370.5 passengers per stop on weekdays, while the Non-Minority census tracts showed average loads of 256.9 passengers per stop. The review indicated that there is not a significant difference in the average passenger loads at sampled bus stops in Minority and Non-Minority census tracts. It should also be noted that several Non-Minority census tracts contained bus stops at the beginning or end-point of a MBL bus route (Tracts 4802.02, 4804.00 and 5038.02) which by their nature have smaller passenger loads than bus stops near the midpoint of the route. Excluding these 3 tracts, the average weekday passenger load in Non-Minority census tracts is 364.0 passengers per stop. Given the findings in the review of average weekday passenger loads between Minority and Non-Minority census tracts, the analysis shows no disparate impacts in service levels to minority populations in the service area.

Bus Stop Spacing

Another factor calculated was the average stop spacing with respect to each census tract. Montebello Bus Lines’ service standards indicate an average stop spacing of approximately 0.25 miles. Minority census tracts showed an average mileage between stops of 0.18 miles while

Non-Minority census tracts showed an average of 0.17 miles. As with passenger loads, given the similarity in bus stop spacing between Minority and Non-Minority census tracts, the analysis shows no disparate impacts in service levels to minority populations in the service area. Data for all the variables calculated and explained above is presented in Table 1.

Table 1: MBL Level of Service Analysis

Census Tract	Minority Tract?	Bus Stops in Tract	Total Daily Load at Bus Stop	Average Load per Stop	Route Miles in Tract	Bus Stops in Tract (within 1/4 mile)	Average Bus Stop Spacing
204120	Yes	8	9,183	1,147.9	1.5	8	0.19
226001	Yes	18	7,750	430.6	3.3	18	0.18
481713	Yes	6	1,641	273.5	0.9	6	0.15
482102	Yes	6	1,437	239.5	1.3	6	0.22
530005	Yes	10	679	67.9	2.3	10	0.23
532101	Yes	17	7,661	450.6	2.6	17	0.15
532303	Yes	30	13,067	435.6	6.3	30	0.21
532304	Yes	12	2,569	214.1	1.8	12	0.15
534203	Yes	9	670	74.4	1.2	9	0.13
206300	No	1	1,077	1,077.0	0.2	1	0.20
207900	No	10	1,423	142.3	1	10	0.10
480202	No	1	58	58.0	0.1	1	0.10
480400	No	13	395	30.4	1.5	13	0.12
500202	No	9	3,227	358.6	2.1	9	0.23
503601	No	6	809	134.8	1.1	6	0.18
503202	No	4	1,006	251.5	0.5	4	0.13
503302	No	8	1,760	220.0	2	8	0.25
503802	No	10	397	39.7	2.3	10	0.23

Quality of Service Analysis

Passenger Access

To assess the quality of service in the MBL transit system, in conjunction with Minority and Non-Minority census tracts, an assessment was made of passenger access from these census tracts to the top three traveled destinations in the transit system. These locations are the intersections of Whittier Blvd./Montebello Blvd.; Whittier Blvd./Atlantic Blvd; and Atlantic Blvd./Pomona Blvd. To analyze this data fairly, the main intersections that lie within each census tract were identified, and the travel time, fare paid, and routes taken from each intersection to the top destinations were calculated. Travel times were calculated using MBL schedules. While some destinations could be reached more efficiently using bus and rail routes operated by other transit providers, such as the regional transit operator Metro, only MBL buses

were used to analyze the quality of service MBL provides to minority and non-minority census tracts.

Table 2: Quality of Service Analysis

Intersection	Census Tract	Minority Tract?	Whittier Blvd./Montebello Blvd.			Whittier Blvd./Atlantic Blvd.			Atlantic Blvd./Pomona Blvd.		
			Travel Time (min.)	Fare Paid	Routes Traveled	Travel Time (min.)	Fare Paid	Routes Traveled	Travel Time (min.)	Fare Paid	Routes Traveled
4th St./Lorena St.	204120	Yes	42	\$2.20	10, 40	20	\$2.20	10, 40	15	\$1.10	40
Washington Blvd./San Pedro St.	226001	Yes	56	\$2.20	20, 50	61	\$3.00	10, 30, 50	64	\$3.00	10, 30, 50
Garfield Ave./Helman Ave.	481713	Yes	28	\$2.20	10, 30	30	\$2.20	10, 30	33	\$2.20	10, 30
Garfield Ave./Graves	482102	Yes	23	\$2.20	10, 30	25	\$2.20	10, 30	28	\$2.20	10, 30
Wilcox Ave./Lincoln Ave.	530005	Yes	14	\$2.20	10, 70	20	\$2.20	10, 70	23	\$2.20	10, 70
Whittier Blvd./Greenwood Ave.	532101	Yes	1	\$1.10	10	23	\$1.10	10	26	\$1.10	10
Washington Blvd./Garfield Ave.	532303	Yes	17	\$2.20	10, 30	19	\$2.20	10, 30	22	\$2.20	10, 30
Garfield Ave./Gage Ave.	532304	Yes	21	\$2.20	10, 30	23	\$2.20	10, 30	26	\$2.20	10, 30
Garfield Ave./Clara St.	534203	Yes	26	\$2.20	10, 30	28	\$2.20	10, 30	31	\$2.20	10, 30
4th St./Alameda St.	206300	No	52	\$2.20	10, 40	30	\$2.20	10, 40	25	\$1.10	40
Olympic Blvd./Hill St.	207900	No	59	\$2.20	20, 50	64	\$3.00	10, 30, 50	67	\$3.00	10, 30, 50
Las Tunas Dr./San Gabriel Blvd.	480202	No	35	\$1.10	20	58	\$2.20	10, 30	61	\$2.20	10, 30
Garfield Ave./Huntington Dr.	480400	No	44	\$2.20	10, 30	46	\$2.20	10, 30	49	\$2.20	10, 30
Whittier Blvd./Santa Gertrudes Ave.	500202	No	47	\$1.10	10	70	\$1.10	10	73	\$1.10	10
La Mirada Blvd./Imperial Hwy.	503601	No	51	\$2.20	10, 50	74	\$2.20	10, 50	77	\$2.20	10, 50
Mulberry Dr./Mills Ave.	503202	No	46	\$2.20	10, 50	69	\$2.20	10, 50	72	\$2.20	10, 50
Mulberry Dr./Colima Rd.	503302	No	48	\$2.20	10, 50	71	\$2.20	10, 50	74	\$2.20	10, 50
Rosecrans Ave./La Mirada Blvd.	503802	No	61	\$2.20	10, 50	84	\$2.20	10, 50	87	\$2.20	10, 50

Note: Passengers using multiple MBL bus routes may purchase a Day Pass for \$3.00

The analysis reveals that all tracts are able to reach the top three destinations for MBL passengers within a 90-minute travel time (See Table 2). Because the top three destinations are located closer to Minority census tracts, the average travel times are relatively shorter from minority census tracts. The average fares paid by travelers from both Minority and Non-Minority census tracts to major destinations are fairly similar, particularly due to the fact that most destinations are accessible with either a direct trip or with one transfer. The exceptions to this are trips to Whittier Blvd./Atlantic Blvd and Atlantic Blvd./Pomona Blvd. from points in census tracts located in Downtown Los Angeles served by MBL Line 50. These trips require 2 transfers on MBL buses to reach these destinations; however, it is likely that most passengers would use Metro Rail services (The Metro Blue, Red and Gold Lines) for these trips based on the speed and cost advantage, and because the Metro Gold Line eastern terminal is within walking distance of both locations.

Passenger Loads

MBL policy is to achieve a passenger load to seat ratio of 1.25 for fixed-route services operating in local service, and 1.00 for fixed-route service operating express service on freeway segments. A review of passenger loads on all MBL lines indicate that MBL service is well within agency policy for the majority of service operated. A significantly low number of the 708 trips operated on weekdays, 434 Saturday bus trips and 391 bus trips operated on Sundays experience overcrowding. Where passenger overloads were observed, the duration of the overcrowding was usually very short.

Table 3 lists those bus trips that have passenger loads of 125% or more of seated capacity (49 passengers). The table also identifies the duration of the overcrowding based on the number of consecutive bus stops served in which passenger loads were at or above the 125% threshold.

As indicated in the table, Lines 10, 20, 40 and 50 experienced some overcrowding during the service day. The highest incidences of overcrowding during weekdays occur during peak periods on Line 10 in both directions. Line 40 eastbound in the P.M period experiences some passenger overloads on the 5:24 p.m. trip. On Line 50 there is some overcrowding in both directions on A.M. Peak trips.

Table 3: Montebello Bus Lines Bus Trips with Passenger Loads Exceeding 125%²

Route	Day	Direction	Terminal Departure Time	Max Load	Route Segment	Duration (No. of Stops)
10	Weekday	W	6:49 a.m.	50	Whittier/Myrtle-Whittier/4th	2
10	Weekday	W	6:49 a.m.	58	Whittier/Montebello-Whittier/Vail	5
10	Weekday	W	2:51 p.m.	58	Whittier/Maple-Whittier/Findley	8
10	Weekday	W	3:16 p.m.	56	Whittier/Maple-Whittier/Findley	8
10	Weekday	W	3:57 p.m.	56	Whittier/Maple-Whittier/Garfield	5
10	Weekday	E	1:04 p.m.	49	Whittier/21st	1
10	Weekday	E	1:38 p.m.	49	Whittier/Taylor-Whittier/Greenwood	2
10	Weekday	E	3:31 p.m.	53	Whittier/Gerhart- Whittier/Findlay	4
10	Weekday	E	6:11 p.m.	51	Whittier/4th-Whittier/2nd	2
10	Saturday	W	3:37 p.m.	64	Whittier/Garfield - Whittier/Goodrich	9
10	Saturday	E	1:00 p.m.	63	Whittier/Gerhart – Whittier/Greenwood	13
20	Weekday	N	7:08 a.m.	57	Greenwood/Date-Montebello/Madison	12
40	Weekday	E	5:24 p.m.	53	Beverly/Atlantic-Beverly/Hillview	2
40	Weekday	E	5:24 p.m.	50	Beverly/Garfield-Beverly/Concourse	3
40	Weekday	W	8:40 a.m.	56	4 th /Fresno-4 th /Soto	4
40	Saturday	E	12:55 p.m.	52	4 th /Lorena-3 rd /Gage	4
40	Saturday	E	12:55 p.m.	50	3 rd /Humphreys	1
50	Weekday	W	5:10 a.m.	58	Washington/Passons-Washington/Commerce	17
50	Weekday	E	5:45 a.m.	53	Washington/Atlantic-Washington/Telegraph	6
50	Weekday	E	6:19 a.m.	51	Washington/Bluff-Washington/Crossway	3
50	Weekday	E	6:19 a.m.	55	Washington/Norwalk-Washington/Lambert	7

As a result of both the Level of Service and Quality of Service Analyses, it would appear that Minority census tracts are receiving an equitable quality of service as Non-Minority census tracts in the Montebello Bus Lines system.

² 2015 MBL Line-by-Line Analysis