

## RESOLUTION NO.24-90

### A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMMERCE, CALIFORNIA, ADOPTING THE CITY'S TITLE VI PROGRAM AND AUTHORIZING STAFF TO SUBMIT THE NECESSARY DOCUMENTATION TO THE FEDERAL TRANSIT ADMINISTRATION FOR REVIEW AND FINAL APPROVAL

**WHEREAS**, Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance; and

**WHEREAS**, as a recipient of Federal Transit Administration (FTA) funding, the City of Commerce is required to implement a Title VI Program that demonstrates that no transit program or service provided by the City creates discrimination toward any demographic of the population served by that program or service; and

**WHEREAS**, the City's current Title VI Program was adopted in 2021 and is required to be updated every three years; and

**WHEREAS**, the staff has prepared a new Title VI Program in accordance with FTA Circular 4702.1B; and

**WHEREAS**, the City is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services based on race, color, or national origin.

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF COMMERCE DOES HEREBY RESOLVE, DECLARE AND DETERMINE AS FOLLOWS:**

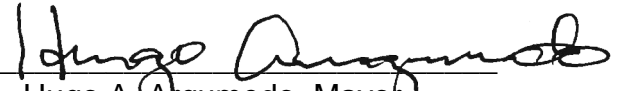
**Section 1.** The City Council of the City of Commerce hereby finds and declares that the foregoing recitals are true and correct, and incorporates them herein as findings and as a substantive part of this Resolution.

**Section 2.** The City Council of the City of Commerce authorizes staff to make any necessary changes, amendments, or revisions to the Title VI Program to ensure compliance with FTA Circular 4702.1B.

**Section 3.** The Mayor is authorized to execute the Resolution and Agreement for and on behalf of the City of Commerce.

**Section 4.** This Resolution shall take full force and effect immediately upon adoption by the City Council.

PASSED, APPROVED, and ADOPTED this 24<sup>th</sup> day of September 2024.

  
Hugo A. Argumedo, Mayor

ATTEST:

  
Lena Shumway  
City Clerk

# CITY OF COMMERCE TRANSIT



## TITLE VI – PROGRAM

**2024-2026**

Adopted September 24, 2024

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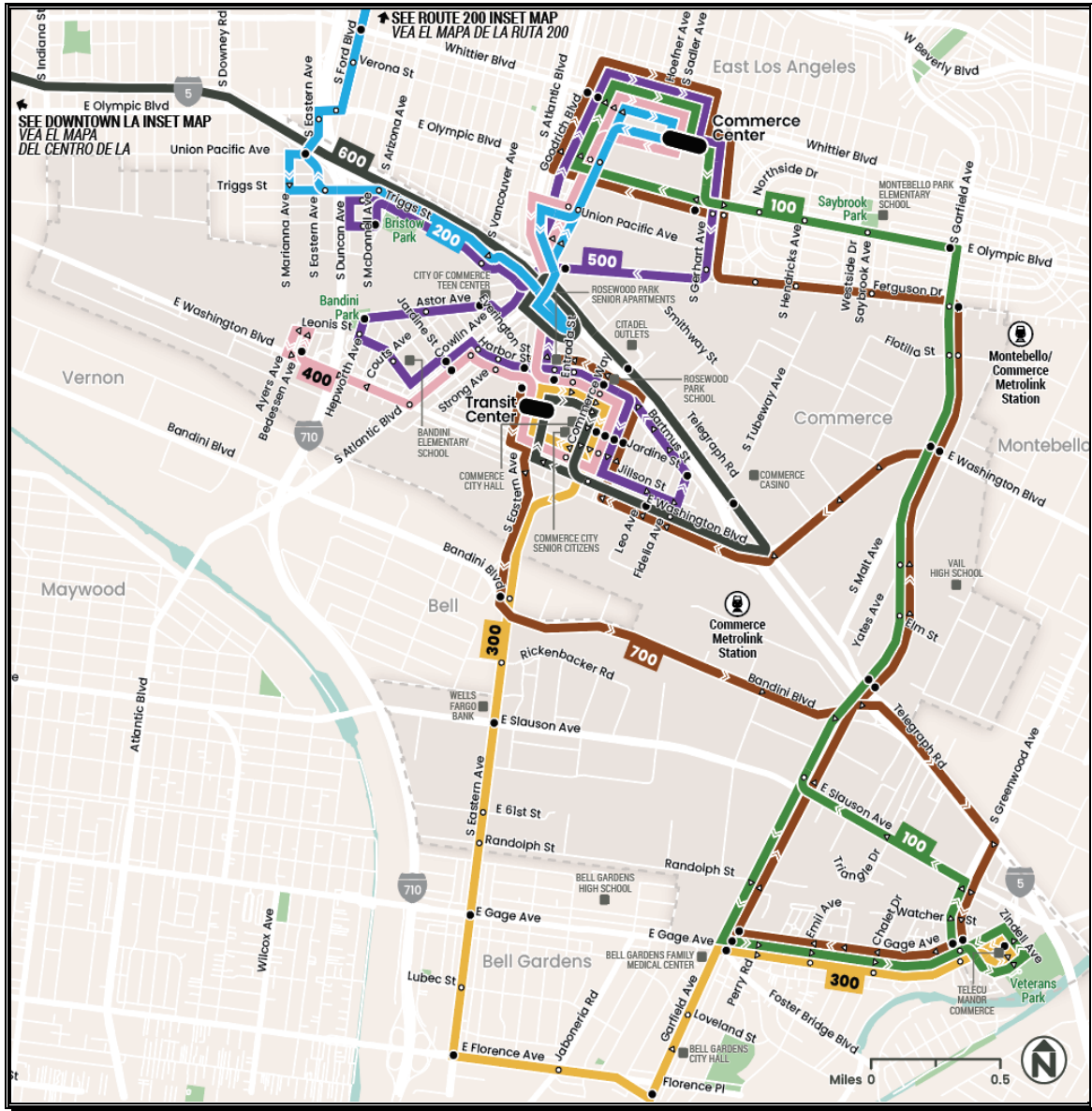
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**Title VI Program Recommended and Approved: Claude McFerguson, Director of Transportation**

**Adopted September 24, 2024**

# Transit System Map



## **Overview - City of Commerce Transit**

The City of Commerce Transit (CCT) is located at 5555 Jillson Street, Commerce, CA 90040, approximately 0.5 miles northwest of the project site. The existing facility currently houses the transit operations, maintenance, and administration offices. The existing TMF maintains approximately 202 vehicles, including 43 buses, facility maintenance equipment, automobiles, light trucks, and trailers.

The City of Commerce spans approximately 6.5 square miles and is southeast of downtown Los Angeles; the Commerce City Hall is about 5.8 miles from the Los Angeles Civic Center. Approximately 71 percent of the City is designated for industrial and commercial land uses. Employment in the City in 2022, the latest year for which data are available, was 54,624. The City's population in 2023 was estimated at 11,672.

## **Services Provided**

CCT began operating in 1969 and operates seven bus routes, six within the City of Commerce and one from downtown Los Angeles. Transit bus route hours of service are Monday through Sunday from 4:30 a.m. to 10:30 p.m. Annual systemwide ridership is approximately 800,622, or an average of 2,193 per day. The City also provides dial-a-ride (DAR) service Monday through Friday from 8:00 a.m. to 5:00 p.m.; annual ridership is approximately 50,000. City-recognized civic and service organizations provide recreational excursion trips on four City-owned buses; annual ridership is approximately 51,250.

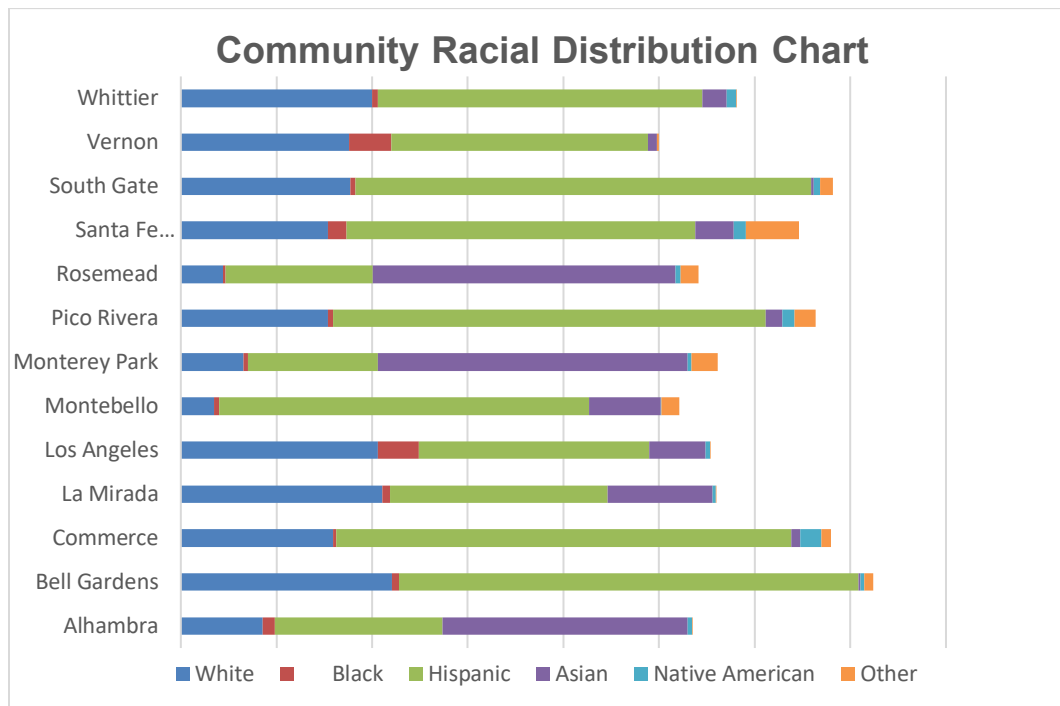
The City's transit bus fleet consists of eleven 35-foot heavy-duty CNG transit buses, six 40-foot heavy-duty CNG transit buses, two 40-foot heavy-duty electric buses, two 24-foot cut-away electric buses, six 40-foot heavy-duty diesel over-the-road coaches, and four 24-foot cutaway CNG paratransit vans. Several other transit providers serve the City of Commerce: the Los Angeles County Metropolitan Transportation Authority (Metro), Montebello Municipal Bus Lines, and the City of Los Angeles Department of Transportation (LADOT). The Metrolink (commuter railway) Commerce Station, on East 26th Street in the City of Commerce, is served by the Metrolink Orange County Line. Metro plans to extend the Gold Line light rail line through the City of Commerce, mainly via Atlantic and Washington Boulevard.

The existing eastern Gold Line terminus is located at Atlantic Boulevard and 3rd Street intersection in the Community of East Los Angeles, approximately one mile north of the City of Commerce. Completing the line between the Community of East Los Angeles and the City of Whittier is tentatively scheduled for 2028. The existing Eastern Gold Line terminus is located at Atlantic Boulevard and 3rd Street intersection in the Community of East Los Angeles, approximately one mile north of the City of Commerce.

## **Community Racial Distribution Chart**

The communities that connect via the CCT service area encompass the ethnicities as reflected in Table 1 below:

City / Ethnicity	White	Black	Hispanic	Asian	Native American	Other
Alhambra	17.10%	2.50%	35.10%	51.30%	0.90%	0.10%
Bell Gardens	44.20%	1.40%	96.10%	0.40%	0.80%	1.90%
<b>Commerce</b>	<b>31.90%</b>	<b>0.60%</b>	<b>95.10%</b>	<b>1.90%</b>	<b>4.50%</b>	<b>2.00%</b>
La Mirada	42.20%	1.60%	45.40%	22%	0.70%	0.10%
Los Angeles	41.20%	8.60%	48.10%	11.80%	1.00%	0.10%
Montebello	7.00%	1.00%	77.40%	15.00%	0.10%	3.70%
Monterey Park	13.10%	1.00%	27.10%	64.80%	0.80%	5.40%
Pico Rivera	30.80%	1.00%	90.50%	3.50%	2.50%	4.50%
Rosemead	8.80%	0.50%	30.80%	63.40%	1.00%	3.80%
Santa Fe Springs	30.80%	3.80%	73.00%	8.00%	2.50%	11.20%
South Gate	35.50%	1.00%	95.30%	0.60%	1.30%	2.60%
Vernon	35.20%	8.80%	53.70%	1.80%	0.00%	0.40%
Whittier	40.00%	1.20%	67.80%	5.10%	2.00%	0.20%



## Background of Title VI of the Civil Rights Act of 1964

**Reference:** FTA Circular 4702.1B Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients. The Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin. Title VI of the Act states, "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, be denied of, or be subjected to discrimination under any program or activity receiving federal financial assistance." To achieve this purpose, each federal department and agency that provides financial assistance for any program or activity is authorized and directed by the United States Department of Justice (DOJ) to put into

effect provisions of Title VI for each program or activity by issuing applicable rules, regulations, or requirements. In this regard, applicants, recipients, and sub-recipients of Federal Transit Administration (FTA) assistance are responsible for distributing transit services and related benefits in a manner consistent with Title VI. Title VI requires recipients of federal aid to monitor and evaluate federal-assisted programs for compliance. The FTA is responsible for ensuring compliance of transit agencies receiving federal assistance. FTA Circular 4702.1B describes the monitoring methodology used by recipients. Transit providers must conduct periodic assessments to determine whether the transit service provided to minority communities, and users are consistent with the objectives cited in the circular. The City of Commerce Transit receives federal assistance for public transit services and, therefore, complies with the Civil Rights Act of 1964 and the provision of Title VI.

**Presidential Executive Order 12898**

“Federal Actions to Address Environmental Justice in Minority Populations,” of February 1994, further emphasizes Title VI protections of race and national origin by directing federal agencies to develop strategies to address the disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. All transit providers, whether direct recipients, primary recipients, or sub-recipients, that receive financial assistance from FTA are also responsible for following the general requirements in FTA Circular 47021. B Chapter IV, which is scaled based on the size of the fixed route transit provider.

Requirements	Transit Providers that Operate Fixed Route Service	Transit Providers that Operate 50 or more Fixed Route Vehicles in Peak Service and are in a UZA of 200,000 or more in Population
Set system-wide standards and policies	Required	Required
Collect and Report Data	Not Required	Required: <ul style="list-style-type: none"> <li>• Demographics and service profile maps and charts.</li> <li>• Survey data regarding customer demographics and travel patterns.</li> </ul>
Evaluate Service and Fare Equity Changes	Not Required	Required
Monitor Transit Service	Not Required	Required

**General Reporting Requirements:** The City of Commerce Transit (CCT) adheres to the Title VI regulations (49 CFR Part 21) and ensures that the public is well advised of Title VI Policy and Complaint Procedure.

**Civil Rights Notice to the Public**

The following *Title VI Notice of Rights* is posted in English and Spanish in all transit vehicles, the lobby of CCT’s administrative office (located at 5555 Jillson Street, Commerce, CA 90040), included in the Department of Transportation Operator’s Manual, posted on the City’s website [www.ci.commerce.ca.us](http://www.ci.commerce.ca.us) and displayed on interior bus cards.

# TITLE VI AND RELATED STATUTES NON-DISCRIMINATION STATEMENT



The City of Commerce, under Title VI of the Civil Rights Act of 1964, as amended, 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; or be otherwise subjected to discrimination under any program or activity it administers.

For more information on Commerce civil rights program and the procedures to file a complaint, please contact 323-887-4419; email [transportationinfo@ci.commerce.ca.us](mailto:transportationinfo@ci.commerce.ca.us) or visit our administrative office at 5555 Jillson Street, CA 90040.

To file a complaint directly with the Federal Transit Administration, contact the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR, 1200 New Jersey Ave., SE, Washington, DC 20590



Questions or Complaints?  
323-887-4419

# TÍTULO VI Y ESTATUAS RELACIONADAS DECLARACIÓN DE NO DISCRIMINACIÓN



La Ciudad de Commerce, bajo el Título VI de la Ley de Derechos Civiles de 1964, según enmendada, se compromete a garantizar que ninguna persona sea excluida de la participación o se le nieguen los beneficios de sus servicios en base a la raza, color u origen nacional; o ser sometido a discriminación de otro modo bajo cualquier programa o actividad que administre.

Para obtener más información sobre el programa de derechos civiles de Commerce y los procedimientos para presentar una queja, comuníquese al 323-887-4419; envíe un correo electrónico a [transportationinfo@ci.commerce.ca.us](mailto:transportationinfo@ci.commerce.ca.us) o visite nuestra oficina administrativa en 5555 Jillson Street, CA 90040.

Para presentar una queja directamente con la Administración Federal de Tránsito, comuníquese con la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, Edificio Este, 5to Piso - TCR, 1200 New Jersey Ave., SE, Washington, DC 20590



¿Preguntas o Quejas?  
323-887-4419

## Community Press Release Notices



**City of Commerce**  
2535 Commerce Way  
Commerce, CA 90040

**Contact:**  
Alyssa Mendez, Transit Analyst  
(323) 887-4419 Ext 2207

**July 11, 2024,**

**For Immediate Release**

### **City of Commerce Transit Receives \$14.2 Million for Transit Improvement**

The City of Commerce celebrated July as “bus month” with the help of the U.S. Department of Transportation's Federal Transit Administration (FTA). The FTA awarded the City of Commerce Transit (CCT) a \$14,229,180 grant for its battery-electric buses and charger’s project. CCT will use the federal funding to purchase six (6) climate-friendly, zero-emissions electric buses. This will improve air quality and provide a more sustainable transportation option for the Commerce community and visitors. With the new funding, CCT will contribute to the City’s goal of supporting a green bus fleet for the future, aligning with broader climate objectives.

The Center for Transportation and the Environment (CTE), a national non-profit and leader in zero-emission bus deployments, helped City staff prepare the grant application and will provide project management and technical assistance for a successful deployment. The FTA's Low-and No-Emission program provides funding to help transit agencies buy or lease U.S.-built low- or no-emission vehicles, including buses and vans. The Bipartisan Infrastructure Law provides \$5.6 billion through 2026 for the Low-No Program, more than ten times greater than the previous five years of funding. For Fiscal Year 2024, approximately \$1.1 billion was available for grants under this program.

On July 9, FTA announced close to 1.5 billion dollars in grants to transit agencies to buy more than 1,100 American-made buses in 47 states. Nearly 80% of the funded projects will involve zero and low-emission technology, reducing air pollution and helping meet President Biden’s goal of zero emissions by 2050. The \$14.2 million grant award announced on July 9, 2024, aims to invest in the future of transit for the Commerce community.

These zero-emission bus grants also support the City of Commerce Transit in training its workers to drive and maintain buses powered by new technology. CCT is excited to help deliver on this critical endeavor, which will improve transit with modernized clean energy technologies.

## **Community Planning Notices**

CCT uses various techniques to engage the general population in transit planning and evaluating impacts on various communities. Public Notices are advertised on the CCT website (English and Spanish) via Social Media (Facebook, Instagram, and Twitter), press releases, CCT transit information signage, and onboard buses.

## **Non-Elected Advisory Councils**

Currently, CTD does not have a transit advisory group comprising non-elected officials. Instead, the Transportation Ad-Hoc Committee, comprised of two council members and the Department of Transportation Director, works collectively to maintain open communication channels. 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 Commerce 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.

## **Governing Body Approval of the Title VI Plan**

CCT 2024 Title VI plan received governing body approval by the City of Commerce's City Council on September 24, 2024. Please see Appendix B for a copy of the approved resolution.

## **Internal Procedures to Investigations Title VI Complaints**

The following is a summary of CCT's procedures to investigate and resolve formal Title VI complaints. Please see Appendix A for CCT's Civil Rights Complaint Form.

1. Any person who believes CCT has discriminated against s/he based on race, color, national origin, or disability may file a Civil Rights complaint by completing, signing, and submitting the CCT's Civil Rights Compliant Form or by calling 323-887-4419. Complaints must be received within 60 days of the alleged incident.
2. CCT encourages the complainant to file the complaint immediately after the alleged incident to ensure a complete investigation and to provide all requested information. Sometimes, video footage from onboard CCT buses is used in the investigation process; however, this footage is generally only retained between 7 and 10 days after a given point in time, depending on the circumstances.
3. Once the complaint is received, CCT will catalog and review it to determine if its office has jurisdiction. If CCT receives a Civil Rights form without an accompanying complaint phone call, CCT will attempt to contact the complainant to confirm receipt.
4. CCT has 60 days to investigate the complaint. If more information is needed to resolve the case, CCT may contact the complainant; if the complainant does not respond with the requested information, CCT will do its best to complete the

investigation and close the case with the information provided. A case may also be administratively closed if the complainant no longer wishes to pursue their case.

5. After the investigation, CCT will attempt to contact the complainant, if requested, indicating the nature of the investigation and resolution.
6. The complainant has the option to appeal the decision.
7. The complainant may also file a complaint directly with the Federal Transit Administration (FTA):

U.S. Department of Transportation Federal Transit Administration  
 Office of Civil Rights, Attention: Complaint Team  
 East Building, 5<sup>th</sup> Floor – TCR  
 1200 New Jersey Ave., SE, Washington, DC 20590

**Title VI Investigations Complaints and Lawsuits**

Since submitting its 2021 Title VI Program, CCT has had no lawsuits and 1 complaint alleging discrimination under Title VI. The 1 complaint alleging discrimination was not substantiated, and no formal Title VI complaints were filed with FTA. CCT 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. See the chart below for a complete listing of the Title VI complaints.

Report #	Incident Date	Time	Route	Vehicle #	Comment Type	Origin	Complaint	Status
0000-378	03/07/2024	1350	202	349	Discrimination	Phone	The passenger stated she felt discriminated against because the driver did not automatically deploy the ramp when she boarded the bus. Upon investigation, it was determined that the Operator enforced City policy and advised the passenger that the ramp would be deployed for any requested passenger.	Resolved

**Public Engagement Process**

CCT’s public participation plan promotes public involvement in transit planning decision-making activities. The plan establishes formal procedures that allow for, encourage, and monitor public participation within CCT’s service area, including, but not limited to,

minority individuals, persons with Limited English Proficiency, and low-income populations. CCT developed a public participation plan following public outreach and input from the community, accomplished through various means, including notification of CCT's website, advertisements in local publications, and email invitations to community stakeholders.

The plan describes proactive public outreach strategies and procedures, which include:

1. Determining what non-English languages and other barriers to public participation within CCT's service area may exist.
2. Providing a general notification of meetings, particularly forums for public input, in a manner understandable to all populations in the area.
3. Hold meetings in locations that are accessible and reasonably welcoming to area residents, including, but not limited to, minority, Limited English Proficiency (LEP), and low-income members of the public.
4. Utilizing various communication methods to capture public input from populations that are typically not likely to attend or engage in public meetings.

### **Public Participation Plan**

This plan promotes public involvement in transit planning decision-making activities. It will establish formal procedures that allow for, encourage, and monitor public participation within the CCT service area, including, but not limited to, minority individuals, persons with Limited English Proficiency, and low-income populations. This document describes proactive public outreach strategies and procedures.

### **Background**

Title VI of the Civil Rights Act of 1964 requires that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." In accordance with Federal Transit Administration (FTA) requirements, Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Requirements," effective October 1, 2012, recipients of federal assistance must report on a triennial basis on compliance with Title VI.

Presidential Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," of February 1994, further emphasizes Title VI protections of race and national origin by directing federal agencies to develop strategies to address the disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. To ensure CCT's compliance with FTA Guidelines, a public participation plan has been developed to promote public involvement in transit planning decision-making activities.

### **Goals and Objectives**

The goal of this plan is to offer a variety of opportunities for the public to engage in transit planning and decision-making activities at CCT, in accordance with Federal Transit Administration (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 other barriers to public participation within the CCT's service area.
- To provide a general notification of meetings, particularly forums for public input, in a manner understandable to all populations in the area.
- To hold meetings in locations that are accessible and reasonably welcoming to area residents, including but not limited to minority, Limited English Proficient (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 directly or indirectly affected by a plan, project, or program based on decisions related to recommendations or implementation actions. Identifying specific stakeholders is particularly important for those who may be adversely affected or denied the benefits of a plan's recommendation(s).

General stakeholders within the CCT's service area may include, but are not limited to:

- CCT Service Area Cities including Commerce, Bell Gardens, Vernon, Monterey Park, East Los Angeles, Montebello, Monterey Park, Pico Rivera, Vernon, Los Angeles, and Whittier.
- Major Employers, including Citadel and Commerce Casino.
- Major Hospitals and Medical Facilities, including the AltaMed Medical Group.
- Educational Institutions, including California State Universities Los Angeles, East Los Angeles College, and Montebello School District.
- Non-Profit and Business Communities, including Disabled Resource Center, Commerce Chamber of Commerce, and Los Angeles Visitor Bureau Associates.
- Regional and Municipal Transit Providers, including the Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT), Orange County Transportation Authority (OCTA), Norwalk Transit, Cudahy Area Rapid Transit, Huntington Park HP Express, Bell Gardens Town Trolley Bus, Maywood Express, and Access Services.
- Government and Governmental Organizations, including the Counties of Los Angeles and Orange, Southern California Association of Governments (SCAG), and Gateway Cities Council of Governments.
- CCT Internal Stakeholders, including the City Council, Commerce Library Commission, Parks and Recreation Commission, Traffic Commission East Yard Communities for Environmental Justice, and all CCT Employees.
- General Public, including minorities, LEP, seniors, and people with disabilities.

### **System-Wide Service Requirements and Standards**

Service performance standards are necessary to ensure that all services contribute positively to the transit network and CCT's financial stability. Performance should be measured regularly to identify trends over time and allow prompt changes to be enacted if necessary. CCT has adopted quantitative system-wide service standards for its fixed route services.

These standards, summarized below, were developed and implemented to help CCT achieve equity for all its transit customers in service design and operations decisions. Performance standards help ensure that CCT services are equitably provided, helpful to customers, and cost-effective for the organization.

### **Passenger Load**

Passenger load is the ratio of passengers in the vehicle to the seats on the bus. If the passenger load is high, additional service may be needed to address the issue, resulting in overcrowding. CCT measures the vehicle load at the maximum load point on each route during peak and off-peak periods. CCT policy is not to exceed a passenger load-to-seat ratio of 1.25 for fixed route services operating in local service and 1.00 for fixed route services operating on freeway segments.

### **Vehicle Headway**

Vehicle headway measures the time between buses on a route. A shorter headway corresponds to more frequent service. CCT generally operates fixed-route service with vehicle headways between 30- and 45 minutes during weekday peak periods and between 30- and 60 minutes during weekday off-peak periods and weekends.

### **On-time Performance**

CCT defines on-time performance for fixed-route bus trips as trips that depart from a time point location no earlier than the time listed on the printed schedules or arrive at the time point no later than five minutes from the scheduled time. Currently, on-time performance is monitored using a CAD/AVL system that effectively tracks on-time performance.

### **Service Availability**

Service availability generally corresponds to the provision of transit service on major traffic corridors in CCT service area and access to high population centers and trip generators in urbanized areas. CCT primarily provides fixed-route service to people who reside within one-half to one-quarter mile of the stops along the transit routes.

Due to the varied number of municipal transit operators, Montebello Bus Lines, El Sol Shuttle, Bell Gardens Trolley, and LA Metro – who provide services at or near many CCT bus stops, patrons can access public transportation services in addition to CCT. The regional operators also coordinate regularly to reduce unnecessary duplication of routes and promote a more even distribution of transit services. CCT's general standard is to have stops spaced approximately one-quarter mile apart, although stops may be located more closely depending upon land use.

Bus stops may be located further apart if safety conditions do not allow a safe stop to be placed within one-quarter mile of the previous stop. Where site conditions allow, CCT aims to have far-side stops, which reduce conflict with right-turning vehicles, eliminate sight-distance deficiencies at intersection approaches, and encourage pedestrians to cross behind the bus.

## System-Wide Service Policies

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

## Distribution of Transit Amenities

Transit amenities refer to comfort, convenience, and safety items available to the general riding public. Amenities may include but are not limited to bus stop benches, shelters, lighting, trash receptacles, and bike racks. Transit amenities are sited following CCT Bus Stop Policy. Within the CCT service area, bus stop amenities may be provided by CCT or by one or more of several other sources, including local governments, private developers, citizen groups, other transit agencies, and commercial advertisers. In general, CCT has jurisdiction over the location and type of amenities placed within the City of Commerce. CCT does specific equipment and placement at existing bus stops in Commerce, following all applicable municipal regulations and permitting processes. Outside of Commerce, each municipality is responsible for determining the type of amenities at each existing bus stop.

CCT may recommend or provide information on its standard equipment used within the City of Commerce; however, each city is responsible for selecting and installing amenities at bus stops within its jurisdiction. CCT will regularly evaluate the conditions and needs of bus stops in its service area and meet with other cities to recommend changes to bus stops. Regarding amenities and their placement, CCT will also consider the input and recommendations from its bus operators, employees, customers, community, and business stakeholders. The table below outlines the CCT method of determining what amenities CCT places at bus stops, which allows it to decide when capital funding resources become available.

## Transit Amenities Determination

Average Weekday Boardings	Category	Amenities Provided
• 100	Tier 1	Bus Shelter, seating, lighting, trash receptacle, and bus stop signage.
• 15-99	Tier 2	Seating, lighting, and bus stop signage.
< 15	Tier 3	Bus stop signage and trash receptacle.

## Vehicle Assignment

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

Vehicle age is also considered a benefit, as it is generally considered a proxy for the vehicle's condition. Barring restrictions of specific vehicle fleets (i.e., zero-emission battery buses unable to travel on longer routes), vehicles are distributed across the routes equitably by age.

### **Fare and Service and Equity Analyses**

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 considering proposed major service or fare changes. Accordingly, CCT has established a threshold defining a “major service change” and the definition of an ensuing adverse impact created by a “major service change”.

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

1. All proposed fare changes, excluding ride-free promotional events and services and temporary fare reductions, are mitigating measures for other actions.
2. All promotional fare reductions remain 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, CCT will conduct a Title VI service and fare equity analysis for review and consideration by the City of Commerce Council and the public before implementing such changes. Proposed system-wide changes are then prepared in staff reports for City Council consideration. Public comments and input from the City Council 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, a span of service changes, frequency changes, route segment elimination, re-routing, or route elimination. When planning major service changes, CCT shall consider the degree of adverse effects through an equity analysis.

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 services 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 above, CCT is a fare-free transit system, and no major service changes occurred during the past three years. CCT management and planning staff hold monthly and weekly 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 input from the City Council formulate the administrative policies that provide equal accessibility and distribution of services to all riders.

### **Line-By-Line Analysis Compliance Procedures**

A strategic line-by-line analysis of CCT's fixed-route transit services is conducted every three years. The most recent line-by-line analysis was conducted in July 2024. 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 of 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 CCT service area.
- ✓ Present the findings of intercept surveys conducted at major bus stops and a random telephone survey of area residents.
- ✓ Develop recommendations for improvements to CCT's fixed-route bus network.

The *Line-By-Line Analysis of Transit Services and Market Survey* provides detailed information on service effectiveness, ridership, capacity issues, passenger loads, route performance, and schedule adherence by the route level. This information provides CCT with the necessary data to meet vehicle load, assignment, and headway standards. The *Line-By-Line Analysis of Transit Services and Market Survey* also captures passenger-boarding details, assisting CCT in determining and placing transit amenities.

### **Disparate Impact Policy**

This policy aims to establish a threshold for when minority populations disproportionately bear the adverse effects of a major service or fare change. For 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. CCT 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.

If CCT finds potential disparate impacts and then modifies the proposed changes to avoid, minimize, or mitigate them, CCT will reanalyze the proposed changes to determine whether the modifications removed the potential disparate impacts of the changes. If CCT chooses not to alter the proposed changes, CCT may implement the service or fare change if there is substantial legitimate justification for the change, and CCT can show that there are no alternatives that would have less impact on the minority population and would still accomplish program goals.

## **Four Factor Analysis**

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

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

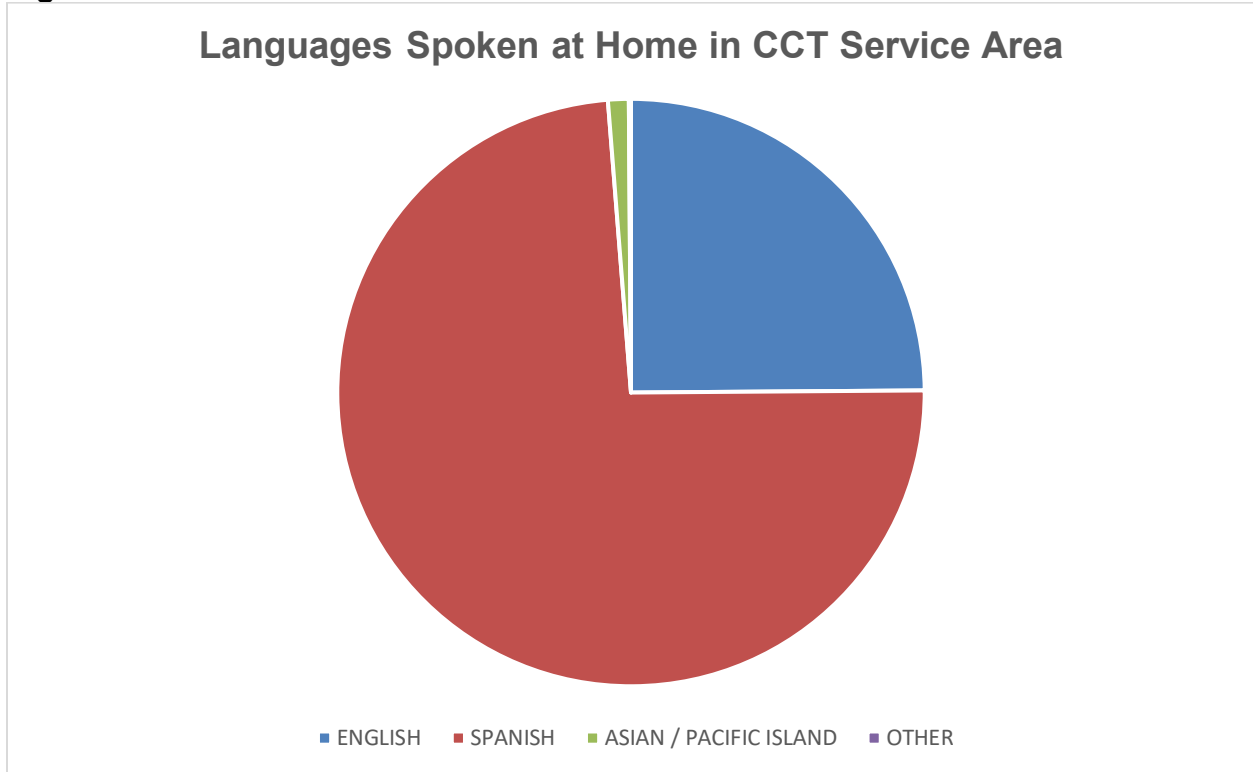
The more significant the proportion of LEP individuals from a particular language group served or encountered in the eligible service population, the more likely language services are needed. CCT serves diverse communities, so the agency regularly encounters LEP individuals throughout its day-to-day operations. Accordingly, CCT, works to ensure that all individuals have access to this vital information which allows them to use the transit system. Below are a few examples of the typical interaction CCT has with LEP individuals:

- Customer Service Call Via Dispatch
- Customer Service Front Desk Counter
- Community Meetings
- Bus Operators
- Public Hearings
- Schedule, Brochures, and Other Printed Materials
- Customer and Community Surveys
- Public Outreach Team and Events
- CCT Website
- CCT Social Media Platforms, including Facebook, Instagram, and X

The U.S. Census Bureau compiles data through its American Community Survey (ACS). This ongoing statistical survey samples a small percentage of the population yearly, giving communities the information they need to plan investments and services. In addition to tracking race, family and relationships, income and benefits, health insurance, education, veteran status, and disabilities, it also provides numbers for areas across the United States of English proficiency.

The categories provided describe levels of English proficiency as speaking English “Well” or “Less than very well.” This data can be accessed for each census tract within areas surrounding the CCT’s service area. This data is the basis for much of the analysis that follows.

**Languages Spoken at Home in CCT Service Area  
Figure 1**



The 2023 ACS showed that of the many languages spoken in the homes of those living within the CCT service area, approximately 25.2 percent of the population speaks only English at home. The remaining 74.8 percent speak a language other than English at home: approximately 73 percent Spanish, 1 percent Asian and Pacific Island, zero-point one percent Indo-European, and zero-point one percent Other and unspecified languages. Figure 1 shows the breakdown of languages spoken at home within the CCT service area, covering 52 census tracts.

As indicated in Figure 1, one-fourth of the respondents in the CCT service area speak English at home (25.2 percent). However, a significant number (73 percent) of respondents speak Spanish at home. Of the LEP population, Spanish is the most predominant language spoken by far. Second to Spanish are Other Asian and Pacific Island languages and Indo-European languages.

Compared to the previous report in 2021, Spanish remains the most spoken language other than English within the CCT area. The LEP population is determined by specific categories used by respondents in the ACS. Using LEP classifications of “Very well” and “Less than very well,” the number of LEP individuals can be determined. As depicted below in Figure 2, approximately 53 percent of the population is classified as speaking English only and speaking English “very well.” The remaining 47 percent reported speaking English “less than very well.” This is considered the LEP population of the CCT service area.

Approximately 47.4 percent of the total LEP population communicates in Spanish, which is by far the primary non-English language spoken in the CCT service area. CCT Service Area LEP Characteristics for populations 1000+ % of total Language % of LEP Total Population: **11,672**

**Figure 2**

<b>DESCRIPTION</b>	<b>ESTIMATE</b>	<b>LEP %</b>
Speak English Only	2,966	23.0%
Speak Spanish and English less than Very-Well	7,604	68.4%
Speak Asian and Pacific Island, English less than Very-Well	536	0.04%
Speak Other Language, English less than Very-Well	566	0.04%

**Safe Harbor**

The U.S. Department of Transportation (USDOT) has adopted the U.S. Department of Justice (USDOJ) Safe Harbor Provision, which outlines circumstances that can provide a “Safe Harbor” for recipients regarding translating written materials for LEP populations. The Safe Harbor Provision stipulates that if a recipient provides a written translation of vital documents for each eligible LEP language group that constitutes five percent or 1,000 persons, whichever is less, of the total populations of people eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written language obligations.

The CCT language group under the Safe Harbor provision speaks Spanish, the largest LEP language group for the CCT service area, with approximately 68 percent of the LEP population. In terms of concentration, CCT has determined that Spanish-speaking LEP populations are concentrated in Downtown Los Angeles and the CCT service areas around East Los Angeles, Whittier, Bell Gardens, and Montebello, which are within the service areas of Routes 100, 200, 300, and 600.

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

CCT regularly works with community organizations and local groups to provide information on transit services, interact with LEP individuals, and receive feedback. These organizations include:

- Asamblea Un Nuevo Comienzo
- Auld Lang Syne Club
- Boy Scots-Troop #473
- Commerce Aquatic Boosters Club

- Commerce Evening Lions
- Commerce Garden Club
- Commerce Senior Citizens Club
- Commerce Sister City Association
- Commerce Social Club
- First Baptist Church of Commerce
- First Baptist Church of Commerce-Spanish Department
- Model City Democratic Club of Commerce
- New Life Family Church
- Society of Our Lady of Guadalupe
- St. Marcellinus Church Holy Name Society
- United Family of Bristow
- Voala-Community Head Start
- Women’s Club of Commerce
- Woman’s Club of Rosewood Park
- American G.I. Forum
- Cub Scout Pack #473
- Door of Hope Community Center
- Mt. Wilson Vista Girl Scout Troop #226
- Organization for the Physically Impaired
- Rosewood Park School PTA
- Rotary Club of Rio Hondo/Bell Gardens/Commerce
- and St. Marcellinus Confraternity of Christian Doctrine

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

**Factor 2: The Frequency with which LEP individuals encounter your Programs, Activities, and Services**

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

CCT recently reviewed the frequency staff and drivers have or could have contact with LEP persons. It also conducted a recent survey of bus operators and frontline staff, including the dispatch office, which handles most calls and visits, and staff who often interact with the community and passengers.

Of those surveyed, 69 percent indicated they interacted with 10 or more individuals with limited English proficiency. Approximately 87 percent of the respondents indicated that Spanish was their primary LEP language encountered.

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

- Fixed Route and Dial-A-Ride Services.
- In-person contact at CCT Front Office.
- CCT staff assist with translation or interpretation via the Telephone.
- CCT outreach events and information booth.
- Bus Operators and their Supervisory Team interact with LEP persons daily in the field.
- Schedules, brochures, and bus signage provided in English and Spanish.
- CCT social media accounts include Facebook, Instagram, and Twitter.
- Outreach with local schools regarding access to services.

### **Factor 3: The Importance to LEP Persons of Your Program, Activities, and Services**

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

Through input from community organizations and interactions with riders, CCT has determined its most crucial services to be its fixed route and paratransit services, which account for ¾ million annual boardings. Related to this service, CCT provides vital documents without which a person cannot access services. CCT vital documents are as follows:

- CCT Rider Guide and Bus Schedule
- Dial-A-Ride Guide
- Title VI Notice, Title VI Plan, and Complaint Procedures
- Language Assistance Plan
- Public Notices to Change in Service

### **Factor 4: The Resources Available to the Recipient and Cost**

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

As a small transit operator, CCT has limited resources but manages to stretch its limited budget through cost-effective and efficient measures that benefit not only CCT LEP customers but all customers. Currently, CCT practices several measures to assist the LEP population.

These efforts include:

- There are staff within the Transportation Department and throughout the City of Commerce who are Bilingual.

- The CCT Route Guide and Bus Schedule are printed in English and Spanish. They provide maps and timetables and offer customers important information about how to ride the bus, critical information on fares and passes, etc.
- There is only minimal incremental cost for this guide, including Spanish translation, as in-house staff provides most of the translation.
- CCT non-bilingual bus operators ask other customers on board for translation assistance when they cannot understand or communicate with an LEP person. If unsuccessful, CCT Bus Operators are instructed to contact Dispatch for assistance.
- Brochures and other materials, including signage and information cards for the bus, are printed in English and Spanish. The total cost of printing the bilingual rider guides is roughly \$8,000 annually.
- A public outreach team and events are held annually to provide the public, including the LEP population, with information and giveaways. These outreach events are already in the budget; however, the staff ensures that Spanish-speaking employees can assist CCT Spanish-speaking customers. This additional cost is approximately \$1,000 per year in employee overtime.
- CCT will continue translating vital documents such as the Riders Guide and Bus Schedule, Title VI Notice, Title VI Plan, Complaint Procedures, Language Assistance Plan, and Public Notices to Change in Service on the CCT website.

CCT will also continue to use its in-house bi-lingual staff to translate for eligible LEP language groups. Finally, CCT continues to explore the cost and feasibility of a third-party language service provider to assist our bus operators and other front-line staff better communicate with LEP individuals in our service area.

### **Language Assistance Plan**

This Limited English Proficiency Plan (LEP) has been prepared to address CCT responsibilities as a recipient of federal financial assistance related to the needs of individuals with limited English language skills. As defined in Executive Order 13166, LEP persons do not speak English as their primary language and have limited ability to read, talk, write, or understand English. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, which states: “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjugated to discrimination under any program or activity receiving Federal financial assistance.” CCT is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services based on race, color, or national origin.

U.S. Department of Transportation (DOT) Limited English plan (LEP) guidance recommends that CCT as a recipient of federal funds, develop an implication plan to address the needs of the LEP population it serves. CCT has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access the services provided. This plan outlines how to identify a person who may need language

assistance, the language assistive measures, training staff, providing notice to LEP persons, and monitoring and updating the LEP plan

### **Element 1: Identifying LEP individuals Who Need Language Assistance**

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

As part of the four-factor analysis, CCT used ACS data to determine the breakdown of LEP individuals within its service area. This was executed by analyzing 52 Census tracts and approximately 6,123 residents. The data showed some very clear trends within CCT service area. Approximately 74.8% of the residents in the service area speak a language other than English at home.

Of the total service area population, 25.2 % identified themselves as speaking English only or “Very well.” As indicated in Factor 1, CCT regularly encounters LEP individuals throughout its day-to-day operations. By far, the most common language group CCT encounters, outside of English, is Spanish.

### **Element 2: Language Assistance Measures**

What the Guidance Says: “An effective LEP Plan would likely include information about how language assistance will be provided.”

CCT will strive to offer the following measures to LEP individuals: persons who speak English “Less than very well.”

- CCT Title VI Policy and CCT staff will take reasonable steps to provide meaningful access to LEP clients with difficulty communicating in English.
- If a Client asks for language assistance and CCT determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide meaningful access and free language assistance. CCT will provide language assistance in the LEP client’s preferred language if possible. CCT can determine whether language assistance is needed and, if so, what type is necessary to provide meaningful access.
- CCT will periodically assess the client’s needs for language assistance based on requests for interpreters and/or translations and their literacy skills.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine the required language and then access language assistance as needed.

### **Element 3: Training Staff**

What the Guidance Says: “Staff members should know about their obligations to provide meaningful access to information and services for LEP persons, and all employees in

public contact positions should be properly trained. An effective LEP plan would likely include training to ensure that:

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

The following training will be provided to CCT staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Process for assisting LEP customers when translation is requested.
- How to handle potential Title VI/LEP complaints.

#### **Element 4: Providing Notice to LEP Persons**

The Guidance Says: "Once an agency has decided, based on the four factors, that it will provide language services, the recipient must notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP person would understand."

CCT currently provides most of its public printed material about service in English and Spanish, including the Route and Schedule Guide and bus signage. Staff members throughout CCT, who are bilingual in English and Spanish, are available to assist customers as needed.

#### Translation of Documents

In those cases where the need arises for LEP outreach, CCT will consider the following:

- When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language for the known LEP population.
- Bus schedules, maps, and other transit publications will be available in an alternative language for the known LEP population.

#### **Formal Interpreters**

- When necessary to provide meaningful service to LEP clients, CCT will provide qualified interpreters upon request, including any bilingual staff of the City of Commerce, if available. CCT has identified all staff who speak languages other than English. Essential stages requiring one-on-one contact, written translations, and verbal interpretation services will be provided in a manner consistent with the earlier four-factor analysis.

CCT may require a formal interpreter to certify the following:

- The interpreter understood the matter communicated and rendered a competent Interpretation.
- The interpreter will maintain private information; non-public data will not be disclosed without written authorization from the client.
- Bilingual City Employees, when available, can provide limited assistance to CCT staff and LEP clients as part of their regular job duties.

### **Informal Interpreters**

- Informal interpreters may include family members, friends, legal guardians, service representatives, or advocates of the LEP client. CCT staff will determine whether it is appropriate to rely on informal interpreters, depending on the circumstances and subject matter of the communication. However, informal interpreters, especially children, cannot provide quality and accurate interpretations in many circumstances. There may be issues of confidentiality, competency, or conflict of interest.
- An LEP person may use an informal interpreter of their own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by CCT. If possible, CCT should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter after CCT has offered free interpreter services, the informal interpreter may interpret.
- If an LEP client wants to use their own informal interpreter, CCT serves the right also to have a formal interpreter present.

### **Element 5: Monitoring and Updating LEP Plan**

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

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

### **Dissemination of the LEP Plan**

A link to the CCT Title VI Plan and the LEP Plan will be included on the CCT website: <https://www.ci.commerce.ca.us/city-hall/transportation>

Any person or agency with internet access can access and download the plan from the CCT website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy at no cost. LEP individuals may request a copy of the plan in translation, which CCT will provide if feasible.

The public can also obtain information about the LEP plan by contacting CCT Customer Service by phone at (323) 887-4419 or via U.S. Postal Service:

Attention: Transportation Department, Director of Transportation, 5555 Jillson Street, Commerce, CA 90040.

**Conclusion:**

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

**City of Commerce Survey Focus Area**

Within the survey focus area, the half-mile and one-mile radius around the Eastern Avenue Transit Hub and proposed Citadel Station location extend from Commerce into East Los Angeles, an unincorporated, census-designated place within Los Angeles County.



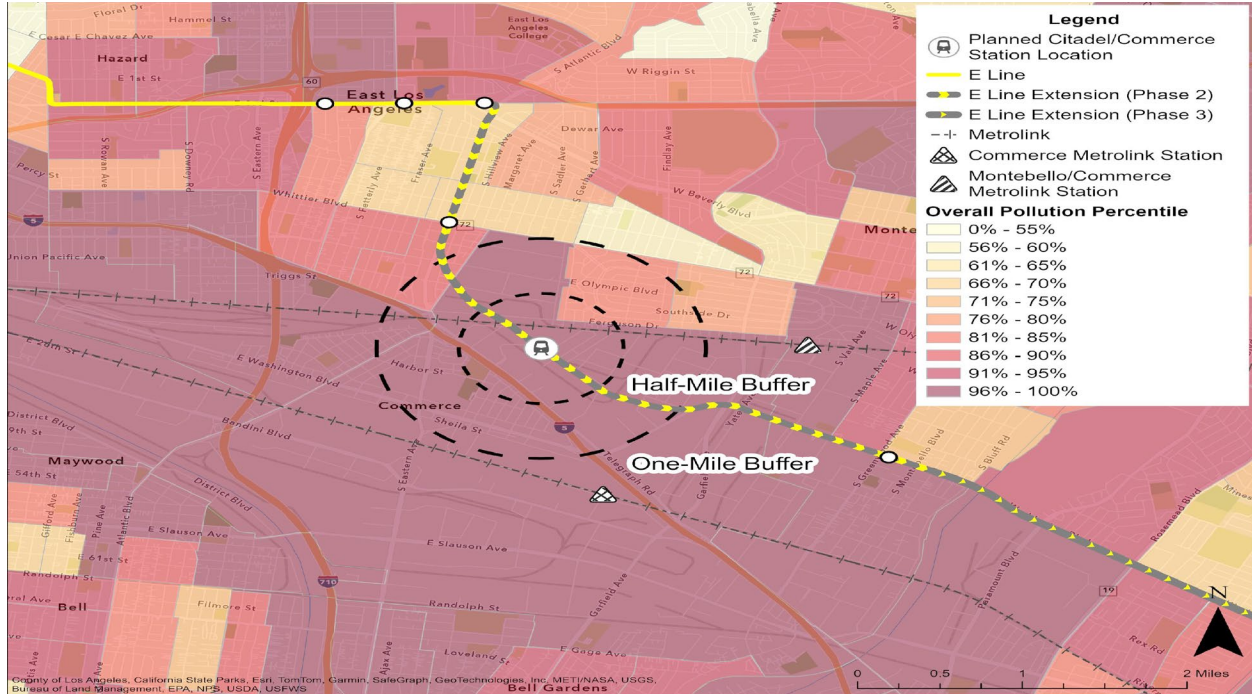
**One-Mile Walk Audit Route**

The I-5 Freeway and railroad corridor heavily constrain the one-mile walkshed in the northern and southwestern sections of the survey focus area.



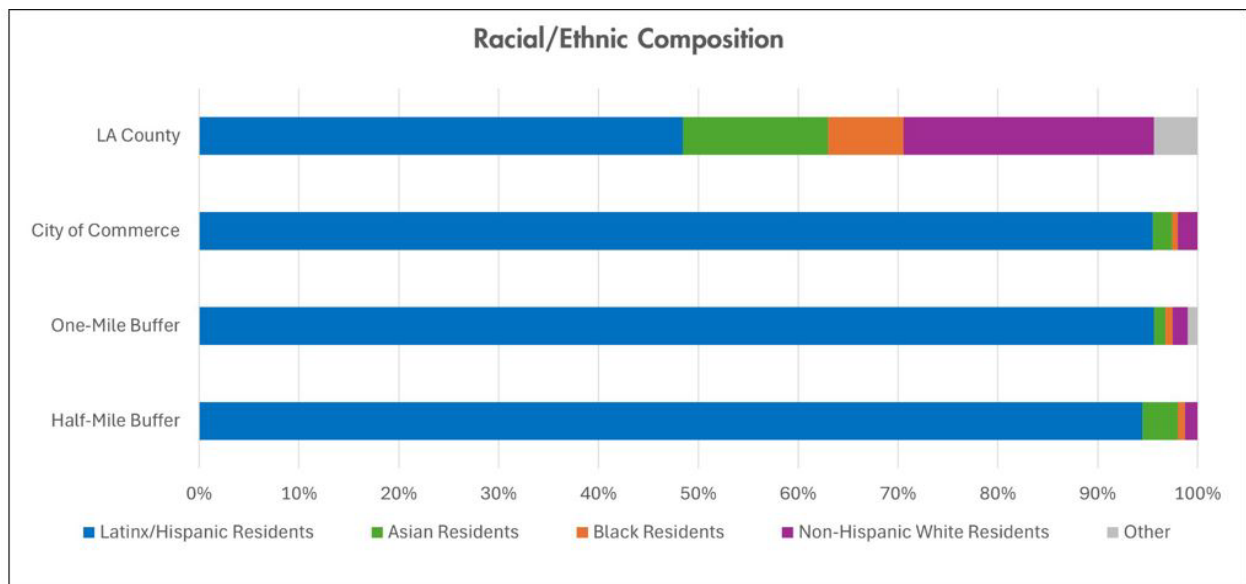
## Pollution

Most survey-focus areas experience higher pollution than at least 95 percent of California census tracts. High levels of diesel particulate matter, toxic releases, cleanup sites, and hazardous waste contribute to these high combined pollution levels.



## Race and Ethnicity

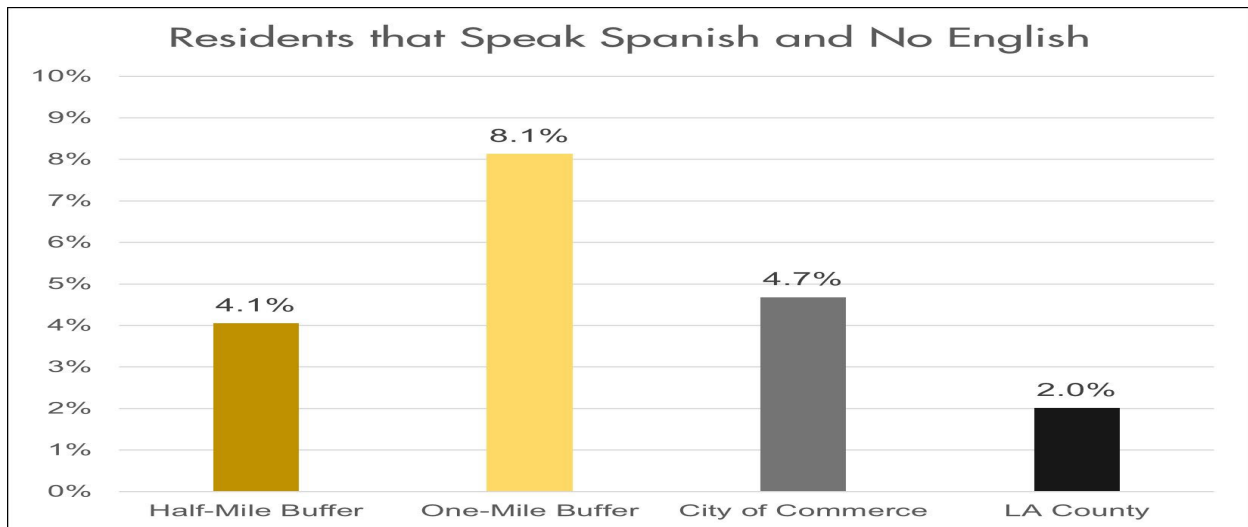
The City of Commerce and the survey focus area have a much greater share of residents of color than Los Angeles County. Both also have a much greater share of Hispanic residents than Los Angeles County.



Source: US Census Bureau, ACS 5-Year Estimates (2022)

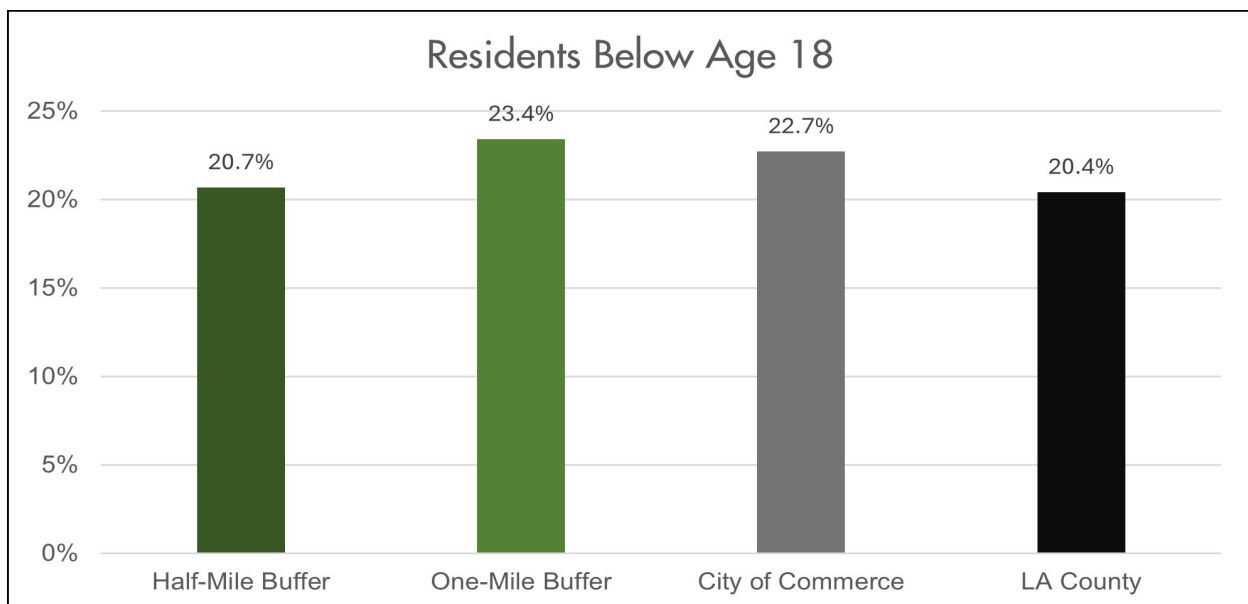
### Limited English Proficient Populations

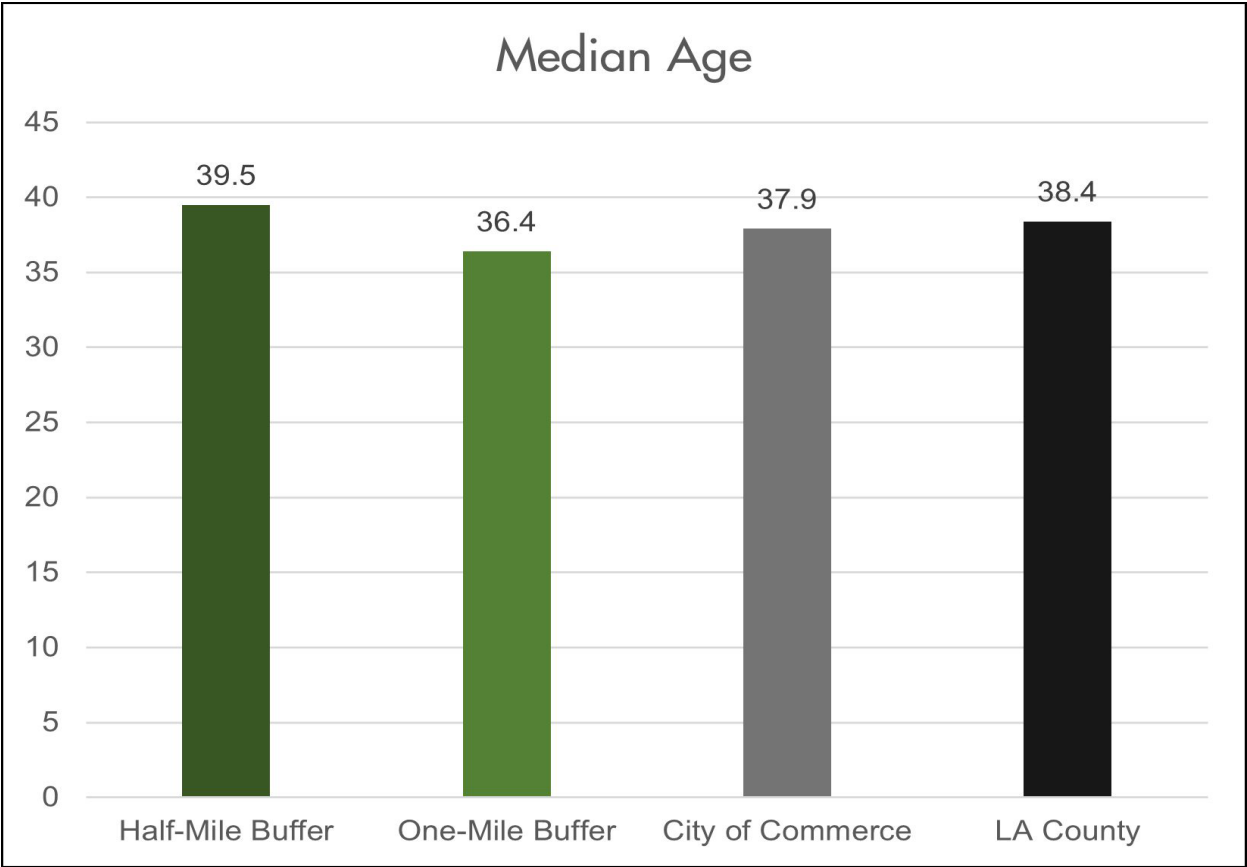
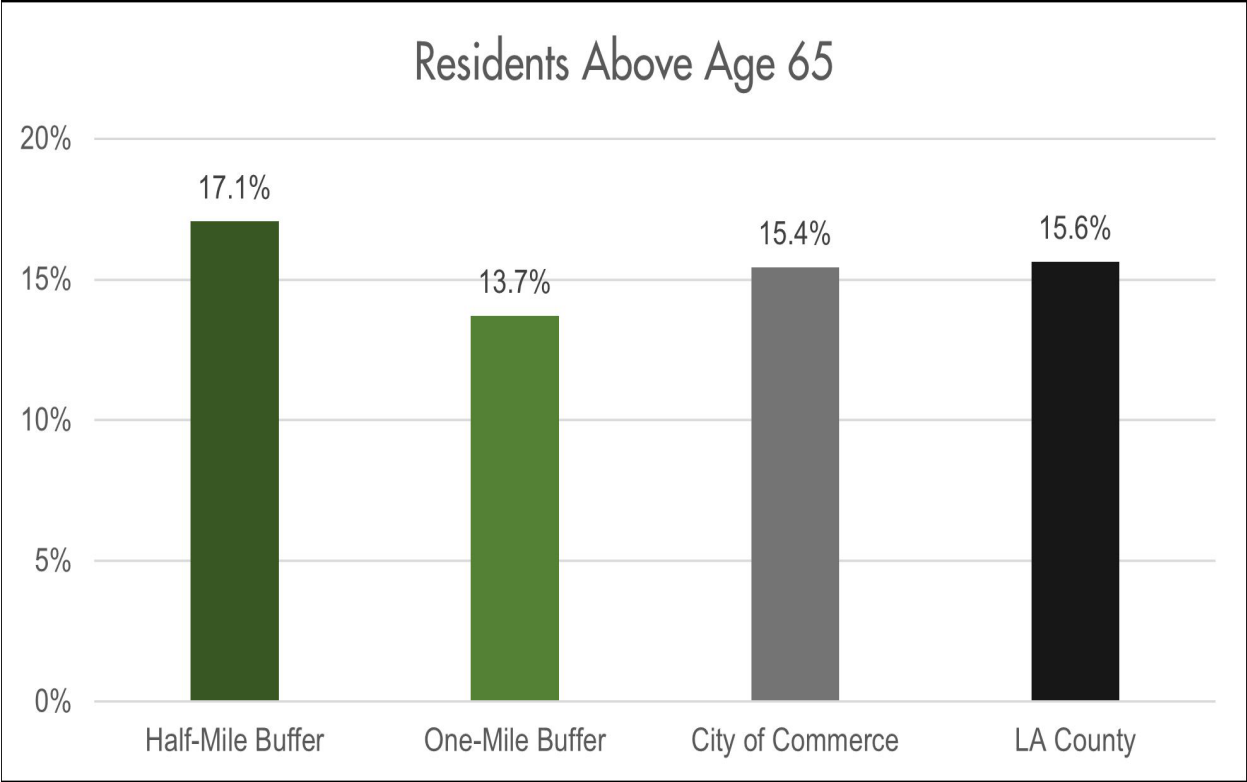
The CCT service area has a higher percentage of non-English, Spanish-speaking residents than Los Angeles County. As CCT's Limited English Proficiency (LEP) Plan outlines, reasonable efforts will be made to engage LEP populations by developing public notices and information in appropriate non-English languages. This will allow those with limited English proficiency to learn about specific projects that may impact them and to provide their input. Other efforts could include conducting focus groups in LEP-populated areas to gain feedback about a particular project or initiative. In addition, non-profit organizations and other advocacy groups may be used to disseminate information to LEP populations.



### Age

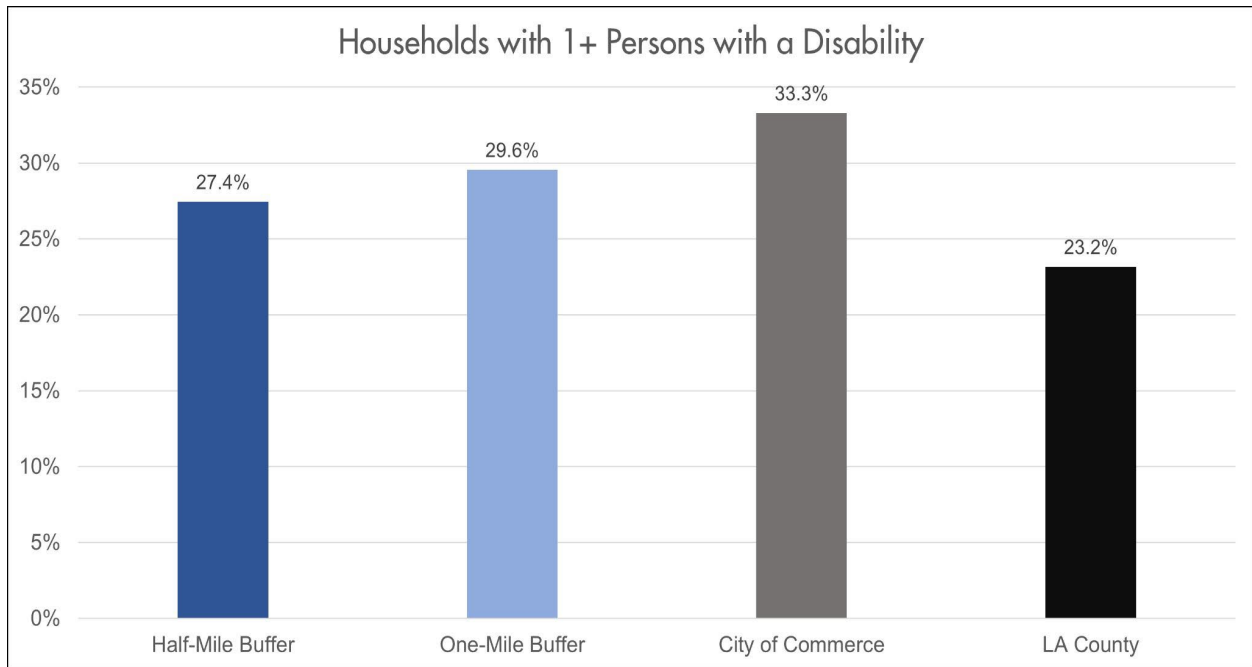
The City of Commerce and the survey focus area demographics have a higher share of residents below the age of 18 and over the age of 65 compared to countywide.





## People with Disabilities

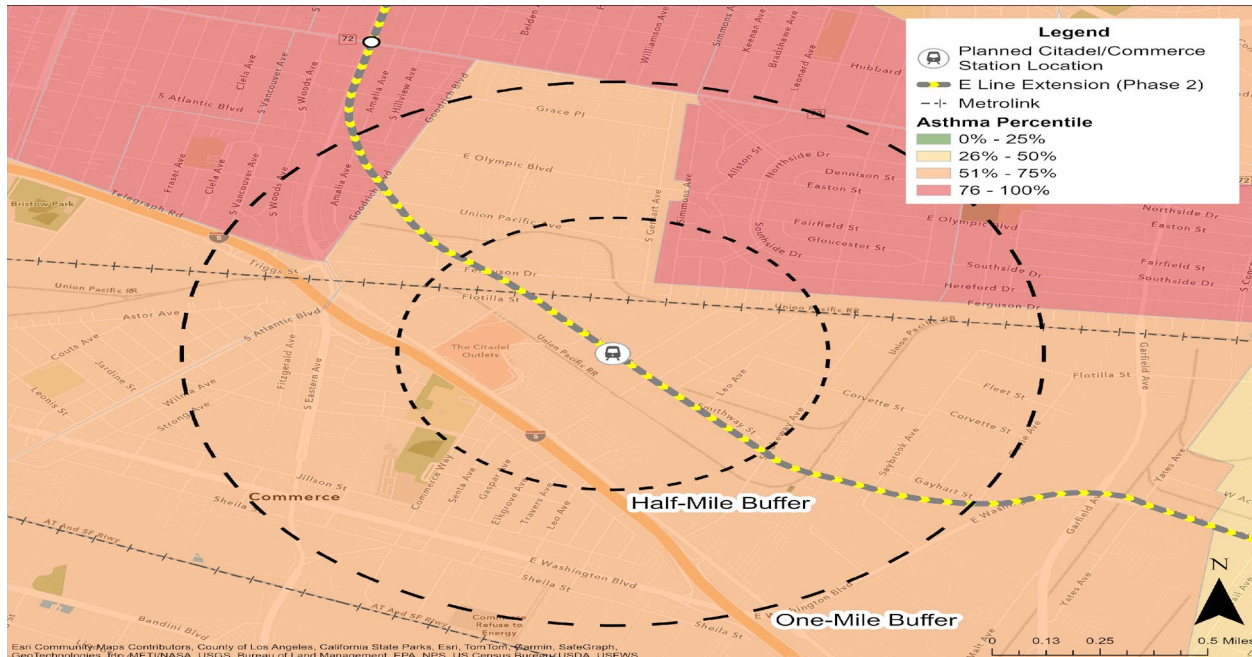
The City of Commerce has significantly more households that have at least one person with a disability than Los Angeles County as a whole.



## Disease Prevalence

Residents in the focus area experience higher asthma rates and higher rates of cardiovascular disease than most other parts of California, most likely due to the built environment.

## Asthma Rates

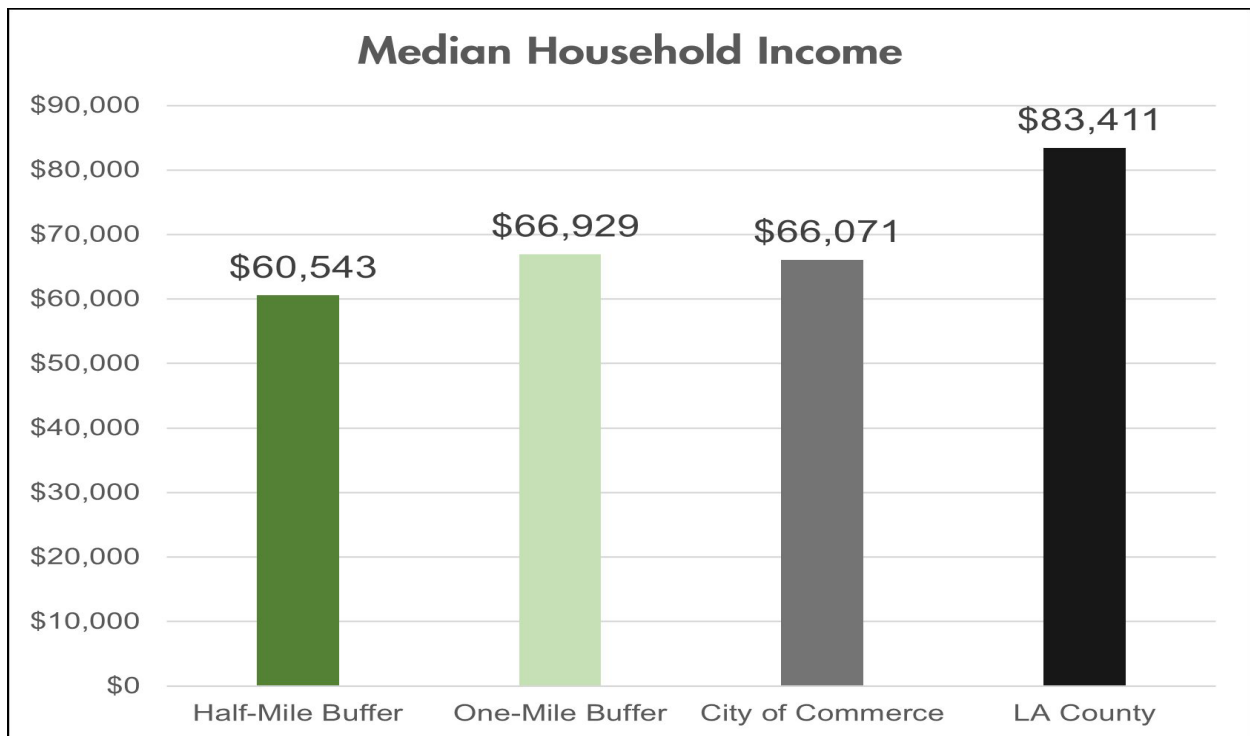


## Cardiovascular Disease Rates



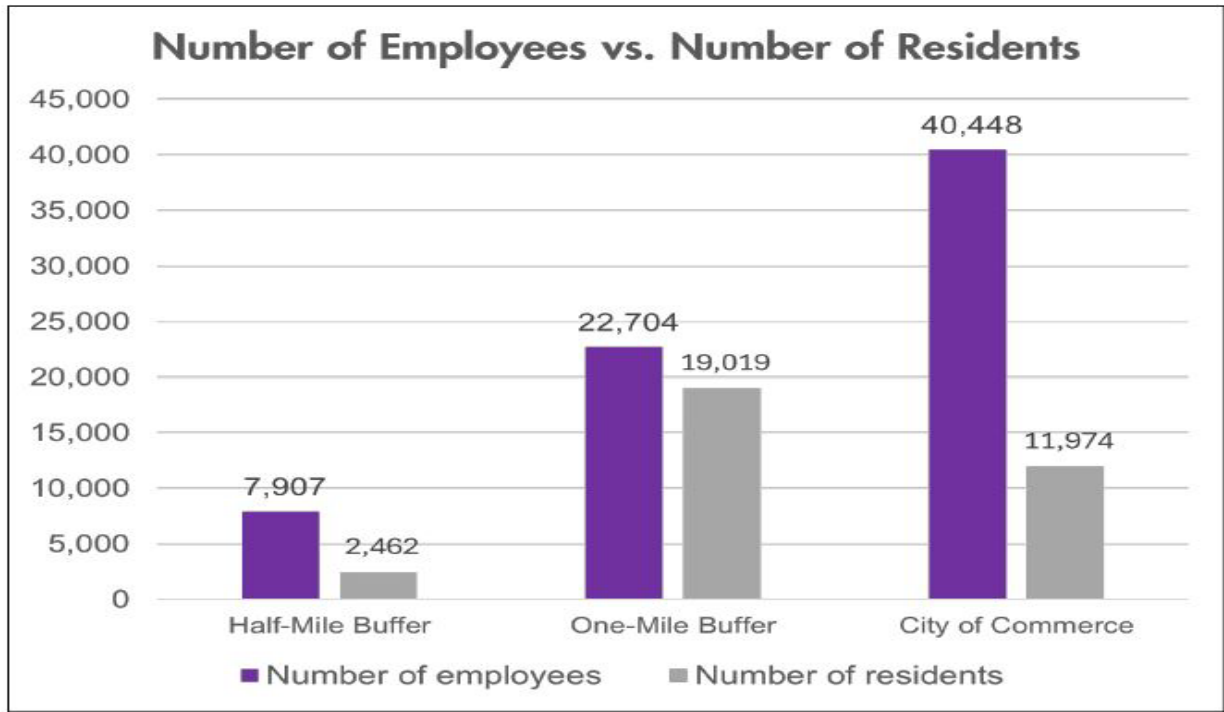
## Median Household Income

The median household income in the survey focus area is significantly lower than in Los Angeles County.

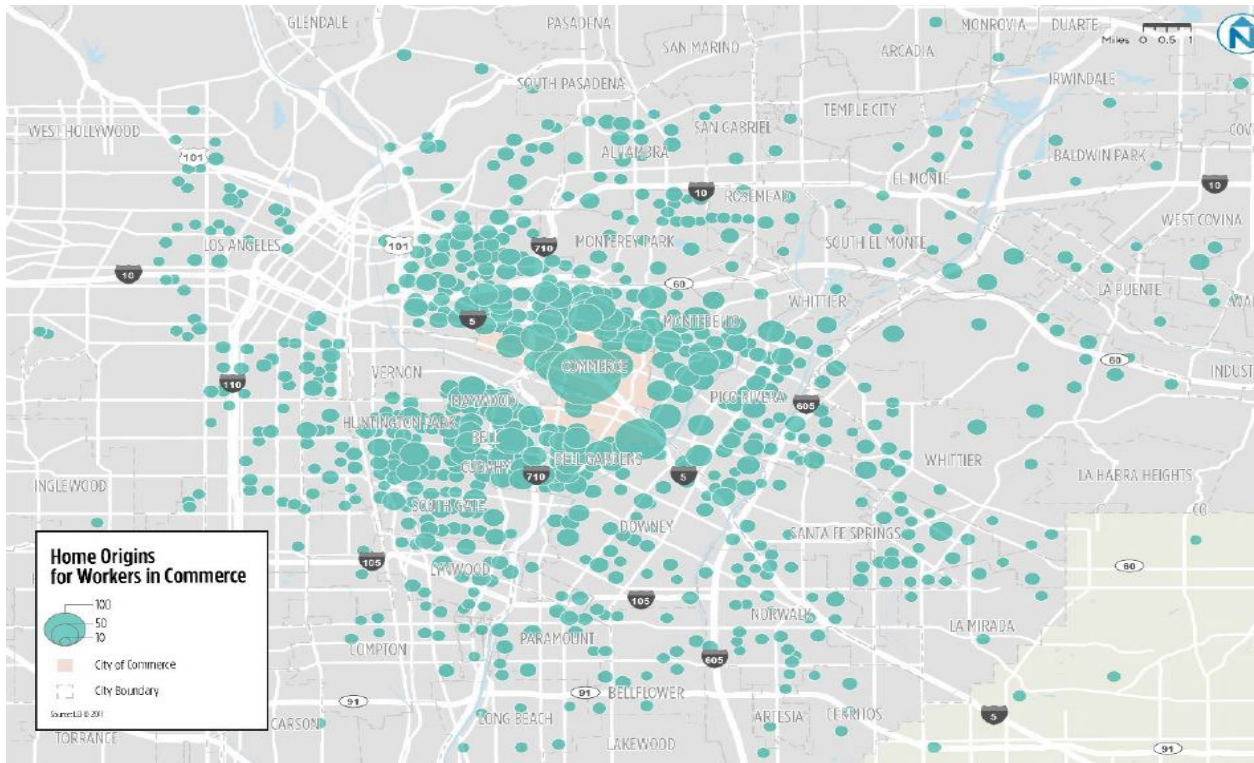


## Employment Ratio

There are more jobs than residents in the City of Commerce.

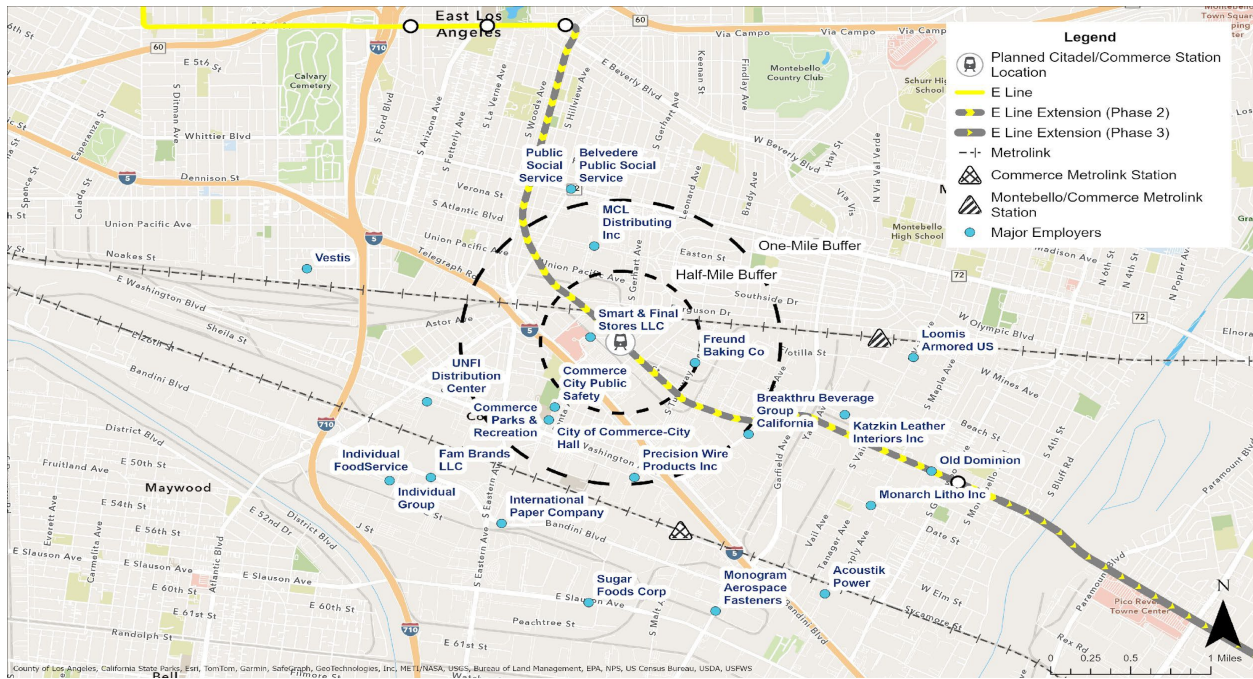


## Home Origins for Employees in Commerce



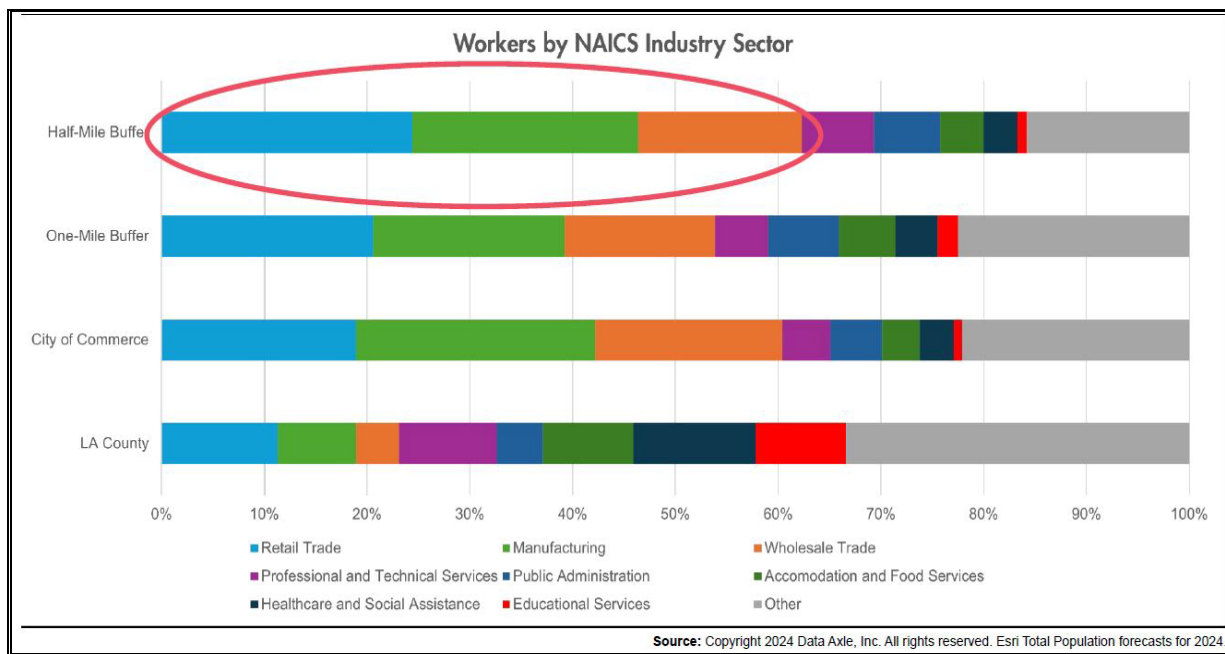
## Major Employers in CCT Focus Area

There are 22 businesses with over 250 employees within a 3-mile radius of the CCT Focus Area.

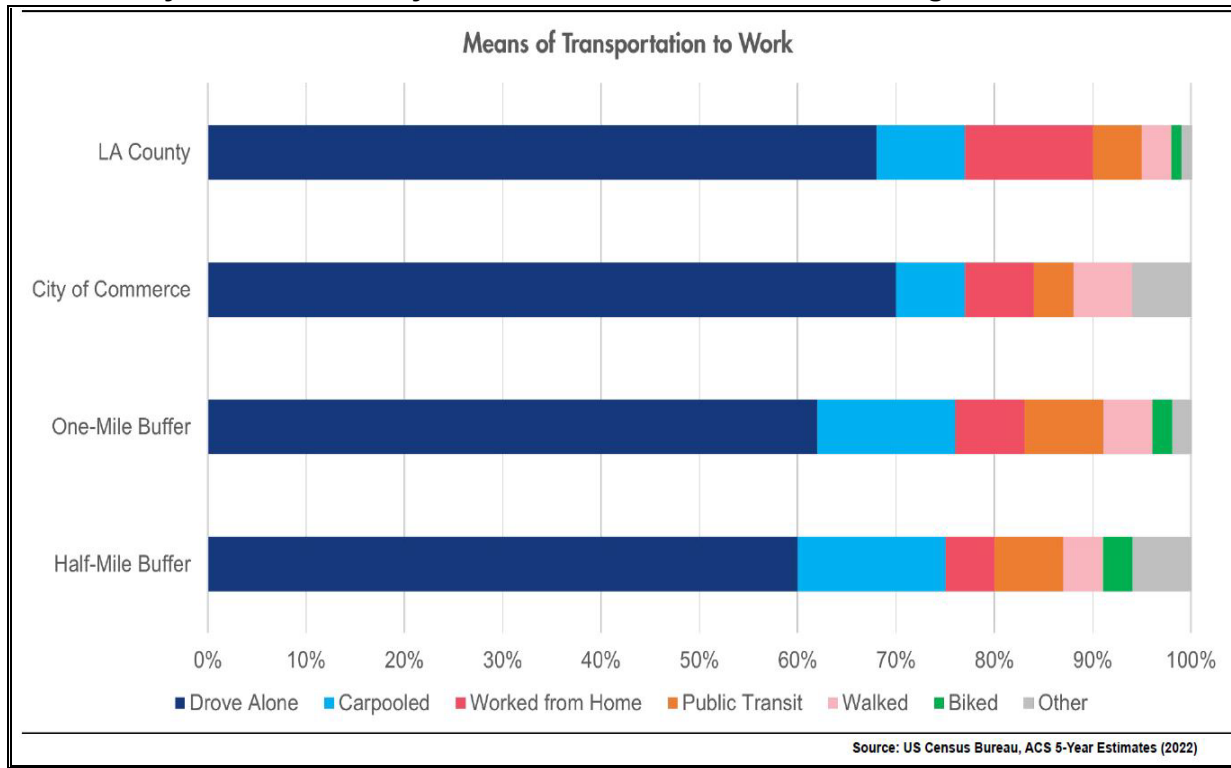


## Employment By Industry

Most workers within the Focus Area are employed in the retail, manufacturing, or wholesale trade sectors (excluding “other”). Workers participate in these sectors at higher rates than in Los Angeles County.

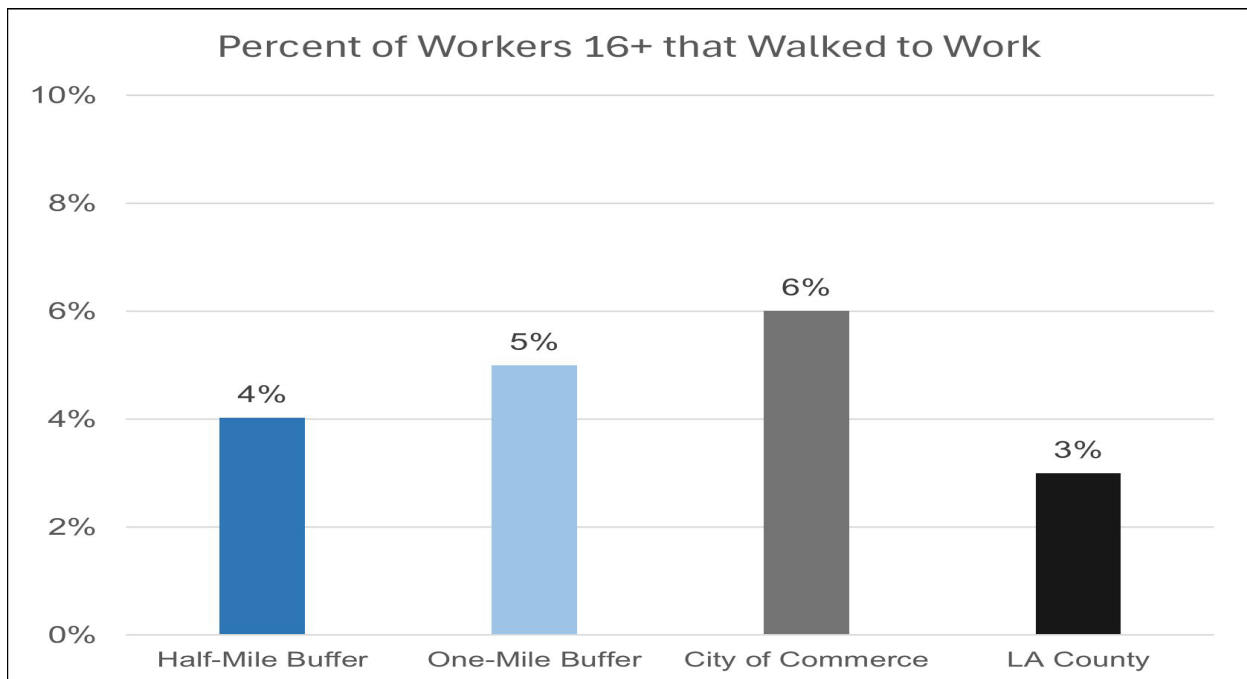


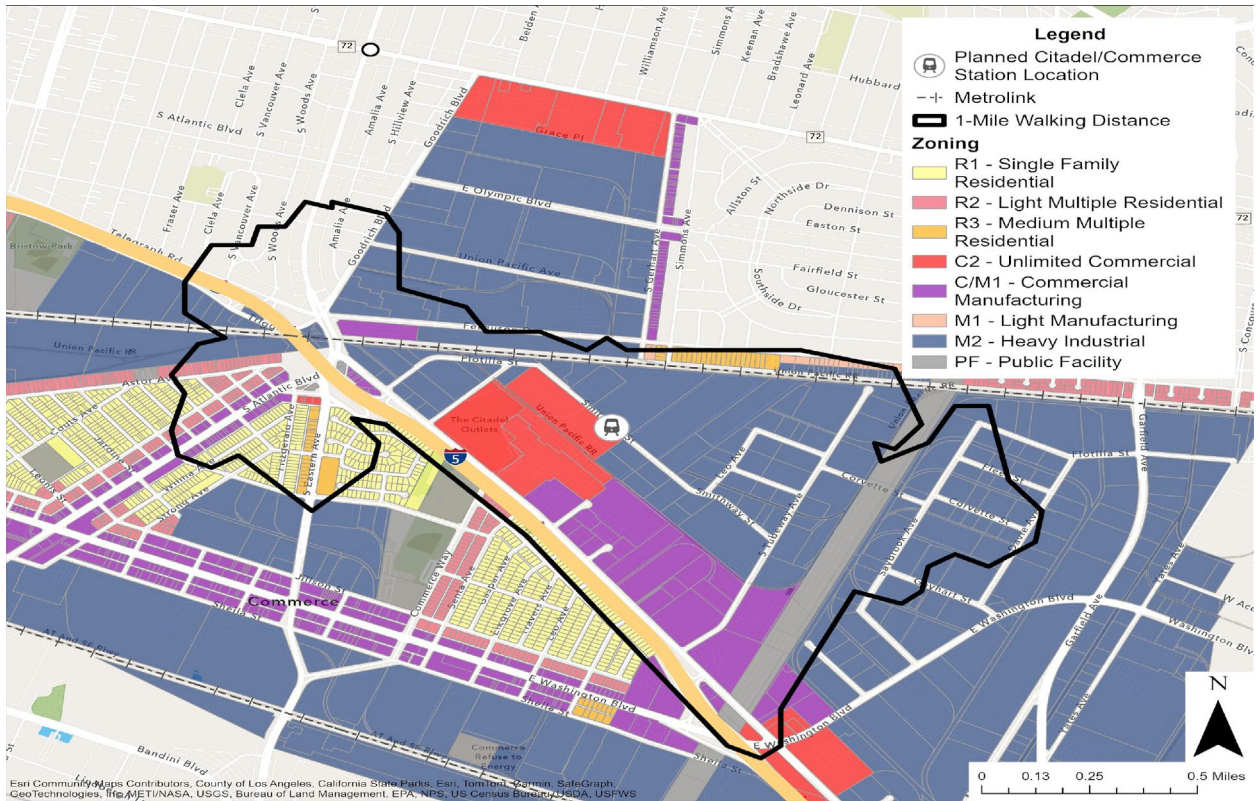
## Connectivity and Accessibility Conditions - Commute Mode Among Residents



### Walkability

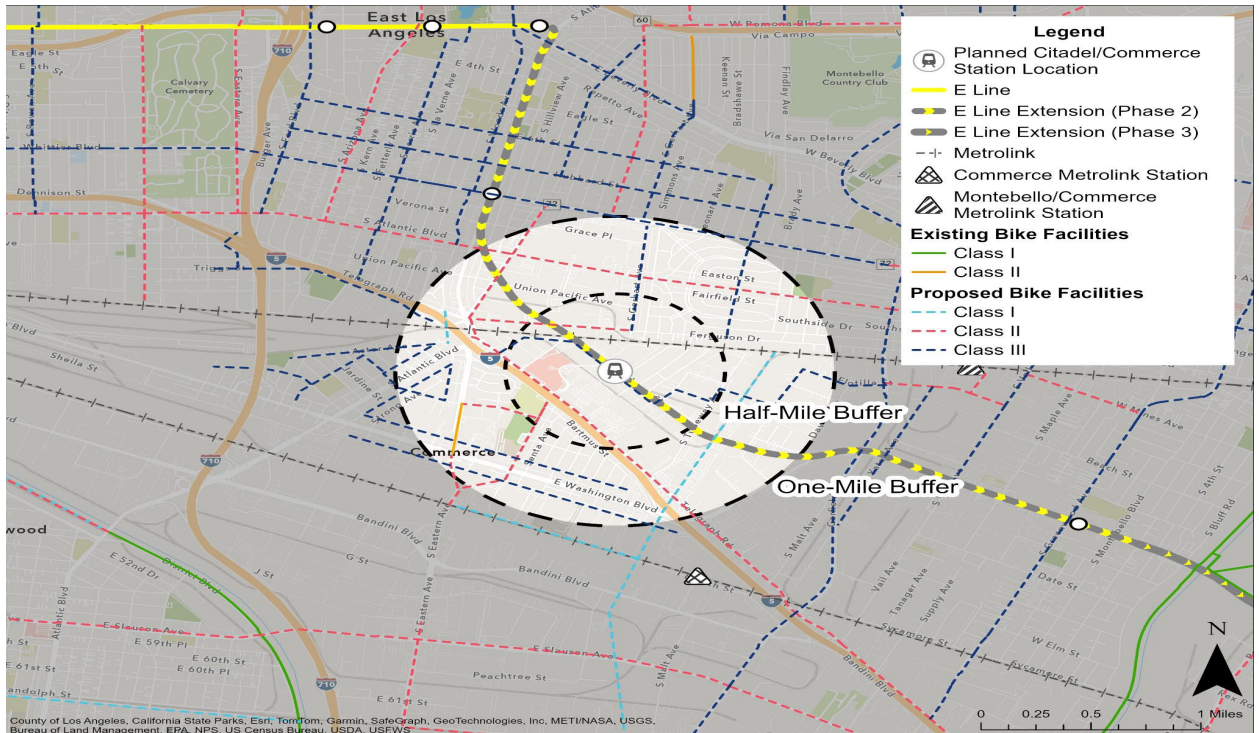
More workers walk to work in the City of Commerce than in the Focus Area or Los Angeles County. Almost all the area within one mile of the planned Citadel/Commerce Metrolink Station is zoned as industrial or commercial.





### Bikeways

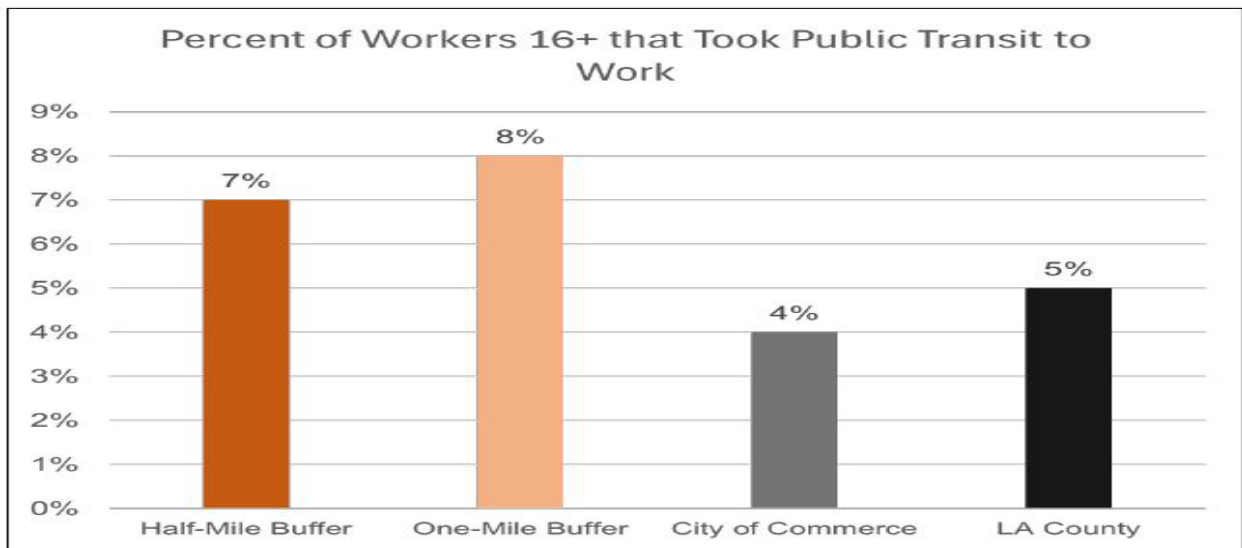
Within the Focus Area, workers biked to work at higher rates than in the City of Commerce and Los Angeles County. However, there are very few bike lanes within the Focus Area.



### Transit Bus Routes – Low-Income Population

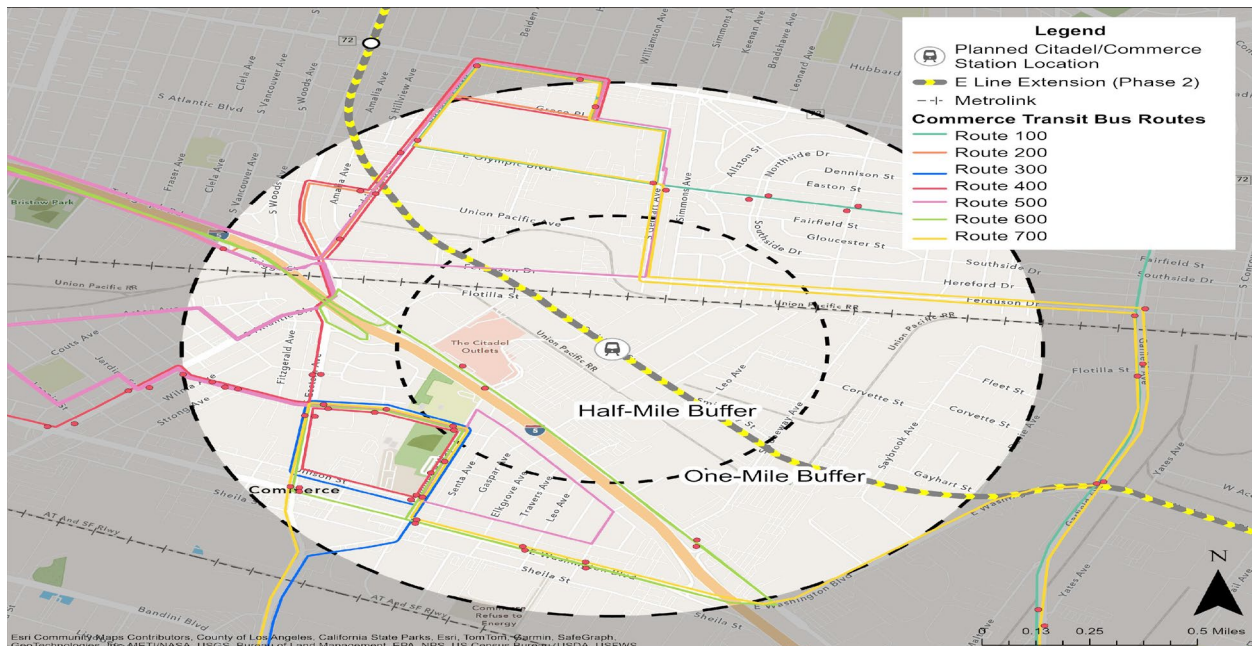
Within the Focus Area, workers took public transit to work at higher rates than in the City of Commerce and Los Angeles County. To ensure low-income populations are not underserved, CCT identified populations within its service area that meet the federal definitions of low-income and engage these groups using its traditional outreach methods, including print, digital, and social media, as previously discussed. Like LEP populations in CCT’s service area, low-income populations are given every reasonable opportunity to provide input on transportation plans and programs to avoid disproportionate harm and facilitate more equitable benefits.

### Percent of Employees That Take Transit

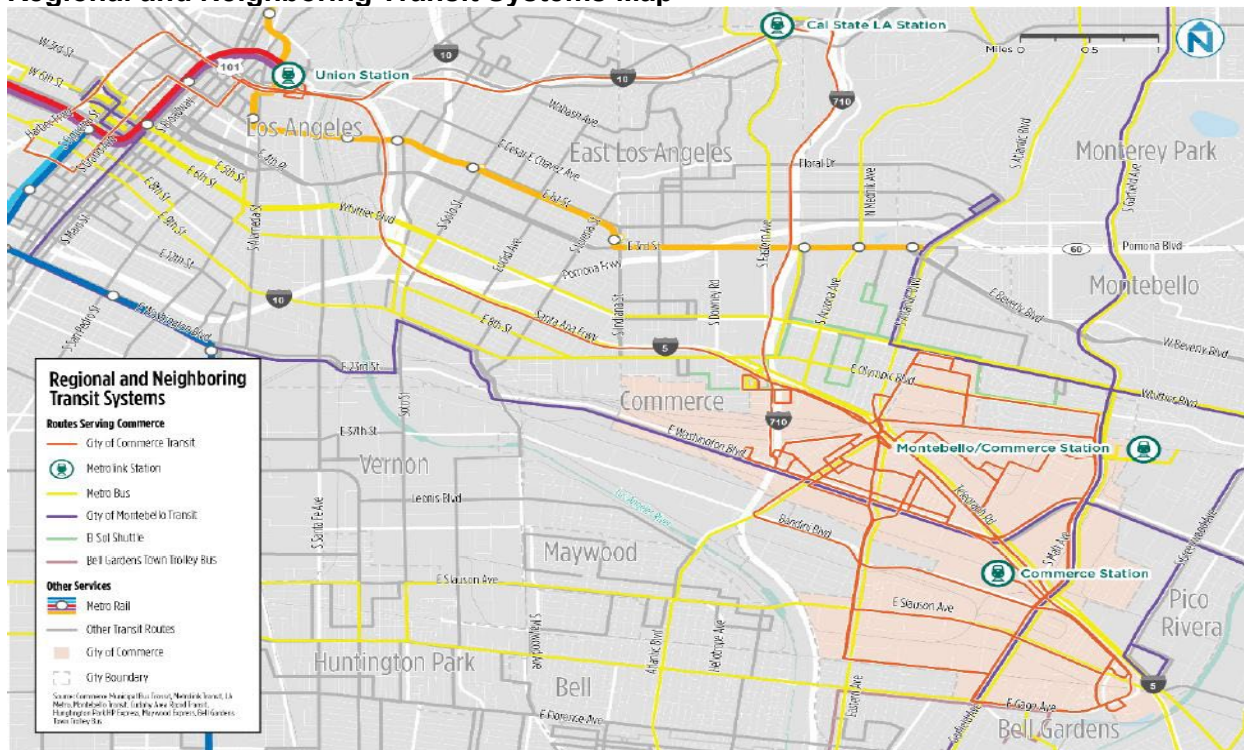


Source: US Census Bureau, ACS 5-Year Estimates (2022)

### City of Commerce Transit Routes

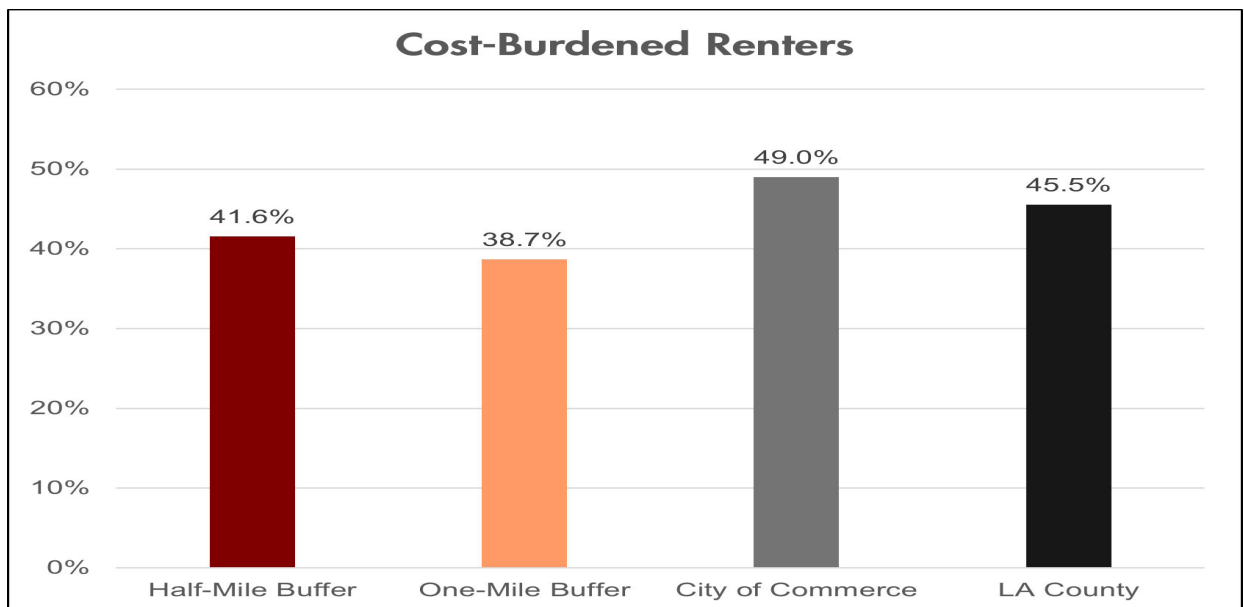


## Regional and Neighboring Transit Systems Map



## Rent Cost Burden

There is a higher percentage of rent-burdened households in the City of Commerce than in Los Angeles County. There is also a relationship between rental households and transit ridership, with higher concentrations of rental units correlating with higher transit ridership. Approximately 2,680 rental households, accounting for 49% of the city's households, are in the City of Commerce. The highest densities of rental households are in the Bandini and Veterans Park neighborhoods.



## Appendix A – Title VI Complaint Form

The City of Commerce Transit (CCT) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. No person or group will be discriminated against regarding fares, routing, scheduling, or quality of transportation service that CCT furnishes based on 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.ci.commerce.ca.us](http://www.ci.commerce.ca.us) website or may also be requested from CCT Customer Service, which can be reached at (323) 887-4419. The Title VI Complaint Form is also available for pickup at the Transportation Department, 5555 Jillson Street, Commerce, CA. 90040. The completed form must be returned to the Transportation Department, Director of Transportation, 5555 Jillson Street, Commerce, CA 90040.

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: \_\_\_\_\_

I believe the discrimination I experienced was based on (check all that apply)

( ) Race                      ( ) Color                      ( ) National Origin                      ( ) Disability

Date of Alleged Discrimination: (Month, Day, Year) \_\_\_\_\_

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Have you filed a complaint with other Federal, State, or local agencies? (Circle one)

Yes / No                      If so, please complete the information below.

Agency: \_\_\_\_\_

Contact Name: \_\_\_\_\_

Street Address, City, State, Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_

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

\_\_\_\_\_  
Complainant Signature:

\_\_\_\_\_  
Date: