

**METRO GOLD LINE FOOTHILL EXTENSION
CONSTRUCTION AUTHORITY**



Foothill Gold Line

TITLE VI PROGRAM PLAN

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Metro Gold Line Foothill Extension Construction Authority

Title VI Program

1. INTRODUCTION

The Metro Gold Line Foothill Extension Construction Authority (Construction Authority) is an independent transportation planning, design and construction agency created in 1998 by the California State Legislature, SB 1847. The agency was created to immediately resume design, contracting and construction of the Los Angeles to Pasadena Metro Gold Line (formerly the Pasadena Blue Line) which had been suspended by the Los Angeles County Metropolitan Transportation Authority (Metro) earlier that same year.

The newly formed Construction Authority completed the Los Angeles to Pasadena segment in less than three years, and the 13.7-mile line opened in 2003 on time and under budget.

The same legislation that created the Construction Authority also dictated its role to plan and construct any "fixed mass transit guide way eastward to Claremont." The planning for the line was later extended to terminate at Montclair's Transcenter, a regional transit hub for numerous bus and rail operations serving San Bernardino County and the Inland Empire.

Once construction is complete, the Construction Authority transfers the project to Metro to operate. This relationship is formalized in a Master Cooperative Agreement approved by both agencies' boards of directors. The current Master Cooperative Agreement, signed in July 2010, manages the relationship for planning and construction of the next two segments of the Foothill Extension from Pasadena to Azusa and Azusa to Montclair.

As a recipient of federal funds, Metro Gold Line is responsible for the effective implementation of non-discrimination laws and regulations. The purpose of the Title VI plan is to describe how the Metro Gold Line will execute the Title VI requirements. The intent is to identify the steps that will be taken to ensure that, for all projects funded by federal financial assistance, the Metro Gold Line provides its services without excluding or discriminating on the grounds of race, color, or national origin, or creating additional barriers to accessing services and activities.

A. Title VI Requirements

The Metro Gold Line Foothill Extension Construction Authority (Authority) is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 which states 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.

Pursuant to this mandate, recipients of federal financial assistance must take affirmative steps to ensure that discrimination does not occur in the organization. Compliance related activities include the following:

- Adoption of assurances, policies and procedures supportive of Title VI requirements
- Ensure that the level and quality of construction-related services are provided without regard to race, color, or national origin.
- Prepare and maintain a Public Participation Plan to ensure public involvement.
- Prepare and maintain a Limited English Proficiency (LEP) assistance plan to provide such persons with information about meaningful access to programs and activities
- Ensure that contractors, subcontractors, and other project participants comply with Title VI requirements.
- Conduct periodic Title VI compliance review on Metro Gold Line program

B. Title VI Policy

The Metro Gold Line Foothill Extension Construction Authority is dedicated to ensuring that no person will be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any Authority project financed in whole or in part with assistance from the Federal Transit Administration (FTA), on the grounds of race, color, or national origin. In meeting these goals, it is our policy to ensure that:

- FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin;
- The level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin;
- Opportunities to participate in the transit planning and decision making processes are provided to persons without regard to race, color, or national origin;
- Decisions on the location of transit services and facilities are made without regard to race, color, or national origin; and
- Corrective and remedial action is taken by the Authority, as required by FTA to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

Reference Attachment A for the Title VI Policy statement.

2. TITLE VI PLAN OVERVIEW (FTA c 4702.1B, 49 CFR 21.9(b))

The Authority relies upon the FTA Circular C 4702.1B in the preparation and maintenance of its Title VI Plan. The Plan provides specific direction on Public Participation, Limited English Proficiency (LEP), Title VI Assurances, Complaint Processing Procedures and Data Collection processes.

The Authority recognizes that it must identify a single point of contact to implement and management the Title VI program. The Authority has assigned this responsibility to:

A. Contact Information

Metro Gold Line Foothill Extension Construction Authority
Civil Rights Officer
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016
Telephone: (626) 471-9050

B. Duties and Responsibilities

- Collection of Title VI data on race, color, national origin on participants affected by Authority's programs, activities, and services.
- Prompt processing and resolution of Title VI complaints.
- Conduct Title VI discrimination complaint investigations or refer complaint to proper Authority personnel.
- Produce and submit required reports, as determined by the Board, on the Authority's Title VI program compliance activities
- Coordinate the development and implementation of a Title VI training program
- Develop information for public dissemination
- Prepare and submit requisite reports on the Authority's Title VI plan to document current policies and revisions

3. ANNUAL ASSURANCE AND CERTIFICATION (FTA C4702.1B, 49 CFR Section 21.9(b))

A. Assurance

As required by 49 U.S.C. 5332 (which prohibits discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibits discrimination in employment or business opportunity), Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000d, and U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation--Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21 at 21.7, the

Authority assures that it will comply with all requirements of 49 CFR part 21; FTA Circular 4702.1, "Title VI Program Guidelines for Federal Transit Administration Recipients," and other applicable directives, so that no person in the United States, on the basis of race, color, national origin, creed, sex, or age will be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity (particularly in the level and quality of transportation services and transportation-related benefits) for which the Authority receives Federal assistance awarded by the U.S. DOT or FTA.

Specifically, during the period in which Federal assistance is extended to the project, or project property is used for a purpose for which the Federal assistance is extended or for another purpose involving the provision of similar services or benefits, or as long as the Authority retains ownership or possession of the project property, whichever is longer, the Authority assures that:

- (1) Each project will be conducted, property acquisitions will be undertaken, and project facilities will be operated in accordance with all applicable requirements of 49 U.S.C. 5332 and 49 CFR part 21, and understands that this assurance extends to its entire facility and to facilities operated in connection with the project.
- (2) It will promptly take the necessary actions to effectuate this assurance, including notifying the public that complaints of discrimination in the provision of transportation-related services or benefits may be filed with U.S. DOT or FTA. Upon request by U.S. DOT or FTA, the Applicant assures that it will submit the required information pertaining to its compliance with these requirements.
- (3) It will include in each subagreement, property transfer agreement, third party contract, third party subcontract, or participation agreement adequate provisions to extend the requirements of 49 U.S.C. 5332 and 49 CFR part 21 to other parties involved therein including any subrecipient, transferee, third party contractor, third party subcontractor at any level, successor in interest, or any other participant in the project.
- (4) Should it transfer real property, structures, or improvements financed with Federal assistance provided by FTA to another party, any deeds and instruments recording the transfer of that property shall contain a covenant running with the land assuring nondiscrimination for the period during which the property is used for a purpose for which the Federal assistance is extended or for another purpose involving the provision of similar services or benefits.
- (5) The United States has a right to seek judicial enforcement with regard to any matter arising under the Act, regulations, and this assurance.
- (6) It will make any changes in its 49 U.S.C. 5332 and Title VI implementing procedures as U.S. DOT or FTA may request.

The following presents the reporting requirements under FTA's Title VI regulations (as contained in FTA Circular 4702.1) that may apply to the Authority. As stated in its policy, it is the Authority's intent to adhere to these requirements (reference Attachment B for the Title VI Assurance and Certification statement).

B. Certifications

The Metro Gold Line Foothill Extension Construction Authority has their current Fiscal Year Certifications and Assurances PINned in TEAM. The Authority's Title VI Coordinator is responsible for providing leadership, direction, and policy to ensure compliance with Title VI and related statutes (reference Attachment B for the Title VI Assurance and Certification statement).

4. TITLE VI PROGRAM REPORT REQUIREMENT (Title 49 CFR Section 21.9(b))

In keeping with Title VI reporting requirement, the Authority will prepare and submit its Title VI report, documenting their compliance, by submitting the Title VI program report to the FTA once every three years. It is the intent of the Metro Gold Line Foothill Extension Construction Authority to meet all reporting requirements of the FTA. These include general reporting requirements as well as any program-specific reporting requirements that may apply. The Authority will submit initial programs and periodic updates as required. A summary of these requirements is included as Attachment A to this policy.

5. NOTICE TO THE PUBLIC (FTA C 4702.1B, 49 CFR 21.9(d))

The Authority recognizes the requirement to provide information to the public regarding their obligations under the Department of Transportation Title VI regulations and to notify members of the public of the protections against discrimination afforded to them by Title VI. To comply with this requirement, the Authority has posted on their website specific information regarding the public's rights and obligations under Title IV. The website posting will contain the following information:

- a. A statement that the Authority operates programs without regard to race, color, or national origin.
- b. A description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations.
- c. A description of the procedures that members of the public should follow in order to file a Title VI discrimination complaint.

Reference Attachment C for the Title VI Public Website Posting.

6. COMPLAINT PROCEDURES (FTA C 4702.B, 49 CFR 21.9(b), 21.11(b)(c))

This section of the Authority Plan describes the procedures for filing a complaint alleging discrimination on the basis of race, color, or national origin. It is the policy of the Authority to ensure that all programs, services, activities, and benefits are executed without discrimination. The Authority further prohibits intimidation, coercion, or participation in other discriminatory conduct against anyone who has filed a complaint under their rights as protected by Title VI. Reference Attachment D for the Title VI Complaint Form.

A. Right to File a Complaint (FTA C 4702.1B)

Any person who believes that he or she, or any specific class of persons may have been subjected to discrimination on the basis of race, color, or national origin, sex, age disability or English proficiency, or other protected class may file a written complaint with the Metro Gold Line Foothill Extension Construction Authority's Human Resources Department; the Federal Transportation Authority (FTA); the U.S. DOT Secretary of Transportation, or the U.S. Department of Justice.

B. Complaint Reporting Process

A written, signed complaint must be filed within 180 days of the date of the alleged discrimination, unless the time for filing is extended. Any Authority employee who becomes aware of a discrimination complaint is encouraged to *immediately* contact the Authority Civil Rights Officer for handling. Those patrons who need assistance with limited English may contact the Metro Gold Line Foothill Extension Civil Rights Officer located at 406 E. Huntington Drive, Suite 202, Monrovia, CA. 91016.

Written complaints may be sent to the Metro Gold Line Foothill Extension Construction Authority, attention Civil Rights Officer, 406 E. Huntington Drive, Suite 202, Monrovia, CA 91016.

In addition to utilizing the Title VI process at the Authority, a complainant may file a Title VI complaint with the Federal Transit Administration (FTA), Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, CA 94105-1839.

C. Reviewing the Complaint

The Authority's Civil Rights Officer will review the complaint to determine whether the complaint is within the Authority's jurisdiction based on the following criteria:

- Whether complainant is a member of a protected group;
- Whether complainant has alleged discriminatory treatment based on race, color, national origin, sex, age, disability or English language proficiency; or
- Whether complainant alleges adverse treatment based on a discriminatory or harassing act.

If the Authority Civil Rights Officer determines that the Authority has jurisdiction, an investigator will be assigned to conduct an investigation within 24 hours of the Authority's Civil Rights Officer review. All complaints will be investigated promptly and handled in a confidential manner.

If jurisdiction is found not to exist in the Office of the Authority, but does exist in another department or company, the complaint will be forwarded to the appropriate department for resolution. The Authority's Civil Rights Officer will be notified of the steps taken to resolve the complaint.

In the event that complainant is dissatisfied with the Authority's determination, the complaint may be submitted to the U.S. Department of Justice Civil Rights Division, 950 Pennsylvania Ave., N.W. Washington, DC 20530.

D. Investigation Process

The Authority investigator will conduct a prompt investigation whenever a compliance review, report, complaint, or any other information indicates a possible failure by the Authority to comply with Title VI regulations. The investigation will take the following steps, at a minimum, to investigate the alleged discriminatory act. The specific investigating steps include:

- Contacting the division manager where the alleged discrimination took place to determine if an investigation has been initiated and the results of the investigation;
- Identifying and reviewing all relevant documents, practices and procedures to determine appropriate resolution; and
- Identifying and interviewing persons with knowledge of the alleged discrimination, such as the Complainant; witnesses; others identified by the Complainant; people who may have been subject to similar activity; or anyone else with relevant information.

The Authority will make every effort to complete the investigation process and to issue its final investigative report within ninety (90) business days of receipt of the complaint.

If no policy violation is found, and the Complainant wants to appeal the decision, he or she may appeal directly to Metro Gold Line Foothill Extension Construction Authority, Civil Rights Officer, 406 E. Huntington Drive, Suite 202, Monrovia, CA 91016. The complainant will have five (5) working days from the receipt of the report to appeal the Authority's findings. If the complainant does not appear during this timeframe, the complaint will be closed.

E. Subsequent Complaints and Amended Charges

Any subsequent complaint or amended charge should be filed utilizing the Discrimination Complaint Form. Amended charges can also be submitted via email or other written format. The Authority's Civil Rights Officer will review each subsequent complaint or amendment to determine whether the subsequent complaint should stand on its own or be incorporated into the original complaint and investigation.

F. Completion of Investigation

Upon completion of the investigation, the Authority's investigator prepares a final investigative report for the Authority's Civil Rights Officer with a copy to the Authority's Legal Counsel. All principle parties will receive written notification of the investigative findings.

G. Implementation of Remedial Actions

If a policy violation is found to exist, appropriate remedial steps will be taken immediately.

7. INVESTIGATIONS, COMPLAINTS, LAWSUITS (FTA C 4702.1B, 49 CFR 21.9(b))

In compliance with the reporting requirements under 49 CFR Section 21.9(b), the Authority, as part of its Title VI procedures will prepare and maintain a list of active investigations, lawsuits, and complaints that allege discrimination on the basis of race, color, or national origin. The list includes the following information:

- The date that the investigation, complaint, or lawsuit was filed;
- A summary of allegation(s);
- The status of investigation, lawsuit or complaint;
- Actions taken by the Authority in response, or final findings related to, the investigation, lawsuit or complaint.

The list shall be updated and submitted to the FTA every three years. Information regarding Title VI investigations, complaints, and lawsuits is on file with the Authority.

8. PROMOTING INCLUSIVE PUBLIC PARTICIPATION (FTA C 4702.1B, 49 CFR 21.9(b))

The Authority maintains its commitment to equality in all of its programs, services, and activities by integrating the objectives and content of Title VI, in its public participation plans and processes. The Authority's plan promotes public participation through proactive strategies and procedures to ensure proper representation of all minorities, low-income persons, public agencies, employees, the general public, transportation service providers, and all other members of the community affected by the Authority's programs and projects.

In order to incorporate into its public outreach activities, the content and considerations of Title VI, the Executive Order on Limited English Proficiency (LEP), and the DOT LEP, the Authority shall solicit input from minority, low-income, and LEP members of the community through its public outreach activities.

The Authority has developed a Public Participation Plan to fulfill the inclusive public participation requirement under Title VI. The practices under this plan include:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Structuring its meetings as to size and format to address the diverse needs of the public's availability.
- Coordinating with community, faith-based organizations, educational institutions, and other like organizations to implement public involvement strategies that specifically reach out to members of affected minority and LEP communities.
- Providing opportunities for public participation through alternative medium, such as personal interviews, audio, or video recording.
- Bilingual Outreach. The Authority provides Spanish-speaking members of the community with information on public transit services in Spanish. This bilingual

assistance is utilized in outreach programs and offered for programs and public meetings.

9. PROVIDING MEANINGFUL ACCESS TO LEP PERSONS (FTA C 4702.1B)

LEP describes individuals who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English as a result of national origin. These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. To maintain compliance with Title VI requirements, the Authority shall provide free language assistance to affected individuals have meaningful access to benefits, services, information, and other important sections of the Authority's programs and activities.

The Authority will follow the Four-Factor framework set forth in Section V of the "Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency Persons – December 14, 2005" to prepare and maintain its LEP Plan.

In accordance with the Four-Factor framework, the Authority's Plan emphasizes the following key points for individualized LEP assessment:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by the program or activity.
2. The frequency with which LEP persons come into contact with the program or activity.
3. The nature and importance of the program, activity, or service provided the Authority
4. The resources available to the recipient for LEP outreach (costs, etc.)

The Authority's plan includes, but is not limited to:

- A specific Language Assistance Plan
- Interpreter services at public meetings (as warranted for the most commonly spoken languages in the community)
- Application of the Department of Justices' Safe Harbor Provision
- Posting signs in areas where the public is likely to read them.
- Stating in outreach documents (website postings, pamphlets, flyers) that language services are available free of charge.
- Working with community-based organizations to inform LEP persons of the language assistance available.
- Through presentations and/or notices at public events organized by the Authority.

Ongoing efforts to maintain and improve upon compliance activities include:

- **Evaluate Effectiveness of LEP Plan:** Obtain concrete data regarding LEP efforts through a comprehensive analysis.
- **Identify Insufficiencies:** Inform the Authority's Civil Rights Officer of any deficiency in LEP program which precludes meaningful access by LEP individuals to the programs administered by the Authority.
- **Evaluate Suggested Improvements:** Review suggestions for improvement to LEP related services and determine whether implementation is practical, economical and consistent with the mission of the Authority.
- **Prioritize Suggested Improvements.** Consideration should be given to the number or proportion of LEP individuals who will benefit from the suggested improvement, the cost to the authority, and whether the change can be implemented in a manner consistent with, and without unduly burdening, the fundamental mission of the authority.

10. MINORITY REPRESENTATION ON DECISION-MAKING BODY (FTA C 4702.1B, 49 CFR 21.5(b)(1)(vii))

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning advisory, or similar body which is an integral part of the program." Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees."

In keeping with the Regulation, the Authority is committed to the participation of minority members on its Board (the makeup of which is described below).

The Authority is comprised of a nine-member Board of Directors. Five (5) members are voting members, while four (4) are non-voting. Two (2) members are appointed by the City of Pasadena; two (2) are appointed by the City of South Pasadena; one (1) is appointed by the California Governor; two (1) members are appointed by the San Gabriel Valley Council of Governments; one (1) is appointed by the City of Los Angeles; one (1) is appointed by the Los Angeles Metropolitan Transit Authority; and one (1) is appointed by the San Bernardino Associated Governments (SANBAG).

The Board is currently comprised of eight (6) males and one (2) female member. Reference Attachment E for more specific Board Member profile information.

11. ENVIRONMENTAL JUSTICE

Environmental Justice (EJ) is the fair treatment of people of all races, cultures, and income, including minority and low-income populations, with respect to the development, adoption, implementation and enforcement of environmental laws and policies. The Metro Gold Line

Foothill Extension Construction Authority incorporates Environmental Justice and non-discrimination principles into plans, projects, activities, and decision making processes to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of our programs, policies, and activities on minority populations and/or low income populations and to provide meaningful opportunities for public involvement by members of minority populations and low-income populations during the planning and development of programs.

12. PROGRAM-SPECIFIC REQUIREMENTS

The Authority will comply with the DOJ and DOT regulations to provide to the FTA the manner in which service and benefits are provided by the Authority. As a recipient that meets the thresholds described below, the Authority shall also submit program-specific information to document compliance with Title VI.

- a. Program-Specific Requirements for Public Transit Providers. The Authority acknowledges its role as a public transit provider that provides public mass transit service primarily in service areas with populations over 200,000, and that receives Federal capital, operating, or planning assistance authorized under the Urbanized Area Formula Program (Section 5307), the Capital Program (Section 5309) or the Federal Aid Urban System Program (23 U.S.C. 142(a)(2)) and Interstate Transfer Program (23 U.S.C. 103(s)(4)), and is therefore required to comply with the Program-Specific Requirements which follow:

- (1) Demographic and Service Profile Maps, Overlays and Charts. The DOJ and DOT regulations state that Federal agencies should require information on the minority population eligible to receive federally funded services. To address this requirement, FTA requires transit providers meeting the threshold to prepare the following demographic and service profile maps, overlays, and charts.

As part of the Authority's Title VI program plan, the following items are updated, submitted, or scheduled as required:

- (a) After each Federal census or as soon thereafter as the new Federal census data becomes available;
- (b) When there are significant-changes in the transit system, but at least every 3 years; and
- (c) Maps and overlays (initially submitted)
 - 1. Base Map. A legible scaled map of the transit service area which identifies:
 - a. Each census tract by number or traffic analysis zone;
 - b. Major streets and highways;

- c. Fixed transit facilities, including rapid rail stations, fixed transit guideways, maintenance and garage facilities, and administrative buildings; and
 - d. Major activity centers or transit trip generators, such as the central business district, outlying high employment areas, schools, and hospitals.
 - 2. Overlays. Two transparencies are submitted that show the distribution of the minority population and transit service in the service area. Overlays are drawn in ink on transparencies. All overlays have appropriate markings to align these over the base map. The two types of overlays are as follows:
 - a. Minority Population Overlay. This overlay encompasses the entire service zone, showing the total minority population for each census tract or traffic analysis zone shown on the base map expressed in raw numbers and as a percentage for that tract or zone. The minority total is the sum of the population totals for each individual minority group (e.g., Black Americans, Hispanic Americans, Native Americans, Asian-Pacific Americans, or Asian-Indian Americans) within the tract or zone. The minority percentage is the total, divided by the total population of the tract or zone, multiplied by 100. Charts are also prepared for each census tract or traffic analysis zone showing the totals for each minority group, and their percentage of the total population of the tract or zone.
 - b. Transit Service Overlay. This overlay shows all transit routes, including rail lines in the service area, with their origins and destinations. The type(s) of service provided on each route is indicated (e.g., express, limited, local, or commuter service) as well as, the time of service (e.g., peak hour only; non-peak hour all day service).
 - 3. Population/Racial Distribution Chart. As required by the FTA the Authority prepares a chart for each census tract or traffic analysis zone showing the actual numbers and percentages for each minority group within that zone or tract. The total population is also shown in the chart.
- (2) Service Standards and Policies. To address the requirement of the DOJ and DOT regulations, that Federal agencies should require information on the manner in which federally funded services are provided, the Authority is prepared to provide information to the FTA (as requested) on its system-wide

service policies and standards that are used by the local transit system (relating to service considerations covered by Title VI).

Pursuant to the following five transit service indicators considered by FTA to be significant to monitor public transit system's compliance with Title VI, the Authority has in place policies and standards for the following recommended indicators:

- (a) Vehicle Load. Vehicle Load or load factor is a ratio of the number of seats on a vehicle to the number of passengers. Load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles. It is also a means to determine whether the level of service on a particular route at a particular time is adequate to assure a level of service deemed appropriate for the transit system. As a service standard, load factor is typically expressed as a ratio (e.g., 1:1.25 or 1 seat for every 1.25 passengers). The load factor is determined by taking the number of seats on a specific route which pass the peak point during the peak hour and dividing that into the number of passengers that are actually carried past that point during that hour.
- (b) Vehicle Assignment. Vehicle assignment refers to the process by which transit vehicles are assigned to routes throughout the system due to variations among vehicles (e.g., age, type or size, amenities, etc.), types of service offered (e.g., express or local, long- or short-haul, etc.), timing of vehicle assignment (e.g., time of day, day of week, holiday/nonholiday, etc.), and other factors (e.g., origin points of vehicles, etc.).
- (c) Vehicle Headway. Vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction on the same route. The frequency of service is a general indication of the level of service provided along a route and a factor in the calculation of the amount of travel time expended by a passenger to reach his/her destination. It is generally expressed for peak end off peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes).
- (d) Distribution of Transit Amenities. Transit amenities refer to items of comfort and convenience available to the general riding public such as escalators at rapid rail stations, "park-and-ride" facilities, etc. Policies or standards in this area address how these amenities are distributed within a transit system. The manner in which such amenities/ facilities are distributed determines whether transit users have equal access to these.
- (e) Transit Access. Transit access is a measure of the distance a person must travel to gain access to transit service. When measured in time intervals, it is a component of the calculation of travel time. Transit access is a

general measure of the distribution of routes within a transit district. The standards or policies covering this area apply to existing services as well as proposed changes in levels of service (e.g., expansion, addition, deletion, etc., of routes).

- (3) Assessment of Compliance by Grantees. Following the FTA recommendation to develop procedures and guidelines for monitoring compliance with Title VI, the Authority conducts periodic compliance assessments to determine whether the transit service provided to minority communities and minority users is consistent with the objectives cited in the FTA Circular.

To comply with this requirement, the Authority engages in the following FTA recommended actions:

- (a) Establish procedures for developing and maintaining Local standards for compliance with Title VI.
- (b) Establish internal guidelines for making determinations of compliance with Title VI as part of local decision making processes and continuing project management and contract administration responsibilities.
- (c) Evaluate system-wide service changes and proposed improvements at the planning and programming stages to determine whether the overall benefits and costs of such changes or improvements are distributed equally, and are not discriminatory.
- (d) Conduct compliance assessments of FTA-assisted transit services and benefits to assure compliance with requirements in Chapter IV.
- (e) Take action on findings and recommendations made by reviewing officials.

- (4) Additional Title VI Considerations/Activities.

- (a) Changes in Service Features. Provide a description of the type of service changes (e.g., route extensions, deletions, etc., including any changes as a result of contracting out transit service) proposed by the the Authority over the next 3 years, and a statement of the effect of these changes on minority communities and minority transit users. In particular, the Authority describes significant service changes relating to hours or days of operation, headways or fares, etc., and provides the schedule reflecting such changes.
- (b) Information Dissemination. Provide a description of the methods used to, inform minority communities of service changes (e.g., public notices, public hearings, other formal or informal public discussions, presentations, meetings, etc.) relating to transit service and improvements.

- (c) Minority Representation on Decisionmaking Bodies. Provide a racial breakdown of transit-related nonelected boards, advisory councils or committees, which are integral parts of the transit agency's planning process, implementation of programs and other related activities. Provide a description of the efforts made to encourage minorities to participate on such boards, councils, or committees.
- d) Multilingual Facilities. Provide a description of the extent to which bilingual persons and/or materials are or will be used to assist non-English-speaking persons desiring use of the transit system. For example, in service areas with a significant Hispanic population, the Authority describes the steps taken to communicate with the community. Efforts include steps such as the utilization of schedules, signs, etc., written in Spanish, as well as providing Spanish-speaking employees. Likewise, the publication of public hearing notices in languages other than English or the use of interpreters are identified.

In cases where the Authority posts signs warning the general public about dangerous situations (e.g., the electrified rail), the information is presented in languages and/or signs when a significant number of the population is non-English speaking.



Foothill Gold Line

Metro Gold Line Foothill Extension Construction Authority

Title VI Statement of Policy

The Metro Gold Line Foothill Extension Construction Authority (Authority) is committed to ensuring that no person in the United States shall, on the ground of race, color, or national origin, age, sex, or disability 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 compliance and as permitted and authorized by Title VI, the Authority will administer a Title VI Program in accordance with the spirit and intent of the non-discrimination laws and regulations.

A handwritten signature in black ink, appearing to read 'H. Balian', is written over a horizontal line.

Habib F. Balian
Chief Executive Officer

3-24-16

Date



Foothill Gold Line

Metro Gold Line Foothill Extension Construction Authority

Title VI Assurance and Certification

The Metro Gold Line Foothill Extension Construction Authority (Authority) under Title VI of the Civil Rights Act of 1964 and related statutes and regulations, ensures that no person shall on the grounds of race, color, national origin, age, sex, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program, service, or activity administered by the Authority.

The Authority affirms the truthfulness and accuracy of the certifications and assurances it has made in statements and submitted herein and the submittal of the Title VI Program Plan.

By signing this document on behalf of the Authority, I declare assurance of compliance with Title VI of the Civil Rights Act of 1964 and related statutes.

Habib F. Balian
Chief Executive Officer

3-24-16

Date



CIVIL RIGHTS POLICY

YOUR RIGHTS UNDER TITLE VI

Title VI of the Civil Rights Act of 1964, and related statutes and regulations provide that no person in the United States shall on the ground of race, color, national origin, gender, age or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity receiving Federal financial assistance.

As a recipient of federal financial assistance, the Metro Gold Line Foothill Extension Construction Authority (Authority) is required to ensure non-discrimination on all of its projects, programs, services, and activities. The Authority is committed to complying with the requirements under Title VI and will promptly investigate all complaints alleging discrimination by the Authority.

To request additional information on the Authority's non-discrimination policy or to file a Title VI Complaint, please contact:

Metro Gold Line Foothill Extension Construction Authority
Civil Rights Officer
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016
Telephone: (626) 471-9050

Retaliation: Retaliation against anyone for making a complaint, activities, acting as a witness, or participating in an investigation is illegal under federal anti-discrimination laws and will be investigated as a separate complaint.



Foothill Gold Line Title VI Complaint Form

Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require that *no person in the United States shall, on the ground of race, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.*

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

Complete and return this form to:

Metro Gold Line Foothill Extension Construction Authority
Civil Rights Officer
406 E. Huntington Drive, Suite 202,
Monrovia, CA 91016

1. Complainant's Name: _____

2. Address: _____

3. City: _____ State: _____ Zip Code: _____

4. Telephone Number (home): _____ (business): _____

5. Person discriminated against (if someone other than the complainant):

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

TITLE VI COMPLAINT FORM

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

- | | | |
|---|---------------------------------|--|
| a. Race/Color <input type="checkbox"/> | c. Sex <input type="checkbox"/> | e. Disability <input type="checkbox"/> |
| b. National Origin <input type="checkbox"/> | d. Age <input type="checkbox"/> | |

7. What date did the alleged discrimination take place? _____

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

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

If yes, check each box that applies:

- | | | |
|---|--|--|
| Federal agency <input type="checkbox"/> | Federal court <input type="checkbox"/> | |
| State agency <input type="checkbox"/> | State court <input type="checkbox"/> | |
| Local agency <input type="checkbox"/> | | |

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

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

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

Complainant's Signature

Date



Foothill Gold Line

Metro Gold Line Foothill Extension Construction Authority

Policy Board Members

The Authority is comprised of a nine-member Board of Directors. Five (5) members are voting members, while four (4) are non-voting. Each member is appointed by a city or other government entity, as directed in the legislation that created this agency.

The Board is currently comprised of seven (7) males and two (2) female member.

Board Members

Doug F. Tessitor, Chair – Appointee of the City of Pasadena.

Sam Pedroza, Vice Chair – Appointee of the San Gabriel Valley Council of Governments (SGVCOG). Mr. Pedroza currently serves as a Mayor in the City of Claremont.

Marisol Rodriguez, Member – Ms. Rodriguez currently serves as City Council Member, City of Los Angeles.

Paul S. Leon, Member – Appointee of the City of South Pasadena. Mr. Leon currently serves as Mayor in the City of Ontario.

John Fasana, Member – Appointee of the Los Angeles County Metropolitan Transit Authority. Mr. Fasana currently serves as Council Member of the City of Duarte.

Gene Masuda, Non-Voting Member – Appointee of the City of Pasadena. Mr. Masuda currently serves as Vice Mayor, City of Pasadena.

Carrie Bowen, Non-Voting Member – Appointee of the Governor. Ms. Bowen currently serves as District 7 Director, Caltrans.

Daniel M. Evans, Non-Voting Member – Appointee of the City of South Pasadena. Mr. Evans currently is an attorney and professor of international business and marketing.

Alan D. Wapner, Non-Voting Member – Appointee of the San Bernardino Associated Governments (SANBAG). Mr. Wapner currently serves as Council Member in the City of Ontario.