

TITLE VI Civil Rights Act of 1964 IMPLEMENTATION PLAN



Table of Contents

County of Los Angeles Board of Supervisors Equal Employment Opportunity Non-Discrimination Policy	2
Los Angeles County Public Works Non-Discrimination Statement / Public Notice	3
Los Angeles County Public Works Non-Discrimination Statement / Public Notice (Spanish)	4
I. Introduction.	5
II. Policies and Regulations	6
III. County and Department Overview	6
IV. Demographics	7
V. Title VI Implementation.	7
Title VI Coordinator	7
Title VI Compliance Measures.	8
Notice of Rights	9
Complaint Procedures	9
Public Participation Plan	11
Limited English Proficiency Plan	11
Training.	13
Disadvantaged Business Enterprise	13
Environmental Justice	13
Annual Work Plan	13
Appendices.	14
Appendix A Complaint Form	
Appendix B Public Participation Plan	
Appendix C Limited English Proficiency Plan	
Appendix D Example of Public Notice Posted on Public Internet Website	
Appendix E Example of Complaint Process and Form Posted on Public Internet Website	
Appendix F Example of Training Resource Website on Employee Intranet	
Appendix G Example of Disadvantaged Business Enterprise Information on Public Internet	
Appendix H Transit Operations Compliance Report	
Appendix I Aviation Compliance Report	
Appendix J Federal Highway Compliance Report	

County of Los Angeles Board of Supervisors

Equal Employment Opportunity Non-Discrimination Policy

It is the policy of the County of Los Angeles to provide equal employment opportunity for all qualified persons, regardless of age (40 and over); ancestry; color; ethnicity; religious creed (including religious dress and grooming practices); denial of family and medical care leave; disability (including mental and physical disability); marital status; medical condition (cancer and genetic characteristics); genetic information; military and veteran status; national origin (including language use restrictions); race (including traits historically associated with race - which includes but is not limited to- hair texture and protective hairstyles); sex (including pregnancy, childbirth, breastfeeding, and medical conditions related to pregnancy, childbirth, or breastfeeding); gender (including gender identity and gender expression); gender identity; gender expression; sexual orientation; and any other characteristic protected by State or federal employment law. Our commitment includes ensuring a non-discriminatory workplace where individuals are valued for their differences, as well as their similarities.

Every County of Los Angeles employee, and every person engaged in business with or on behalf of the County, has an ongoing responsibility to create a non-discriminatory work environment through their personal conduct.

Responsibility for the implementation of the County of Los Angeles Equal Employment Opportunity Non-Discrimination Policy rests with the Director of Personnel. However, all department heads are responsible for carrying out this policy within their department. The Board of Supervisors expects each department head, manager, and supervisor to ensure compliance with this policy.





Los Angeles County Public Works

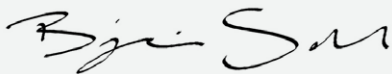
Non-Discrimination Statement / Public Notice

Los Angeles County Public Works, is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity sponsored or implemented by Public Works, including those receiving Federal financial assistance from the U.S. Department of Transportation, on the grounds of race, color, and national origin or any other category protected by State or Federal law.

Public Works is committed to complying with Title VI of the Civil Rights Act requirements for all programs and services delivered to the public. This implementation plan serves as a guide and a reflection of Public Works' commitment to preserving civil rights for all individual and group beneficiaries of its programs and services. Related federal statutes, remedies, and state law further those protections to include sex, disability, religion, sexual orientation, and age.

For Title VI questions information or guidance on how to file a complaint, please contact the Title VI Manager at (626) 979-5333 or visit the web page: <https://dpw.lacounty.gov/general/civilRights/>

Individuals requiring reasonable accommodations, interpretation services, and materials in other languages or in an alternate format may submit a request to Public Works free of charge at (626) 979-5333 at least seven (7) business days prior to the meeting. Hours of operation are Monday - Thursday from 7 a.m. - 5 p.m. Requests outside of the 7 day time frame will be accommodated to the extent feasible. Individuals with hearing or speech impairment may use California Relay Service 711; or at titlevi@dpw.lacounty.gov.

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Benjamin Sandoval, Chief
Workforce Support Division

Obras Públicas del Condado de Los Ángeles

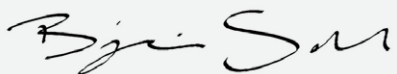
Declaración de No Discriminación / Aviso Público

Obras Públicas del Condado de Los Ángeles se compromete a garantizar el cumplimiento del Título VI de la Ley de Derechos Civiles de 1964 y otras autoridades de no discriminación, que ninguna persona será excluida de participar o se le negarán los beneficios de, o será objeto de discriminación en cualquier programa o actividad patrocinada o implementada por Obras Públicas, incluidas aquellas que reciban asistencia financiera Federal del Departamento de Transporte de los EE. UU., con base en la raza, el color y el origen nacional o cualquier otra categoría protegida por la Ley Estatal o Federal.

Obras Públicas se compromete a cumplir con los requisitos del Título VI de la Ley de Derechos Civiles para todos los programas y servicios proporcionados al público. Este plan de implementación sirve como guía y es un reflejo del compromiso de Obras Públicas de preservar los derechos civiles de todos los beneficiarios individuales y grupales de sus programas y servicios. Los estatutos federales, los recursos y las leyes estatales relacionadas amplían esas protecciones para incluir el sexo, la discapacidad, la religión, la orientación sexual y la edad.

Para preguntas sobre el Título VI, información u orientación sobre cómo presentar una queja, comuníquese con el Gerente del Título VI al (626) 979-5333 o visite el sitio web: <https://dpw.lacounty.gov/general/civilRights/>

Las personas que requieran adaptaciones razonables, servicios de interpretación y materiales en otros idiomas o en un formato alternativo, pueden presentar una solicitud sin costo a Obras Públicas al (626) 979-5333 por lo menos siete (7) días hábiles antes de la reunión. El horario de atención es de lunes a jueves de 7:00 am a 5:00 pm. Las solicitudes fuera del marco de tiempo de 7 días se atenderán en la medida de lo posible. Las personas con discapacidad auditiva o del habla pueden usar el Servicio de retransmisión de California 711; o enviar un correo electrónico a titlevi@dpw.lacounty.gov.

A handwritten signature in black ink, appearing to read 'Ben Sandoval'.

Benjamin Sandoval, Chief
Workforce Support Division



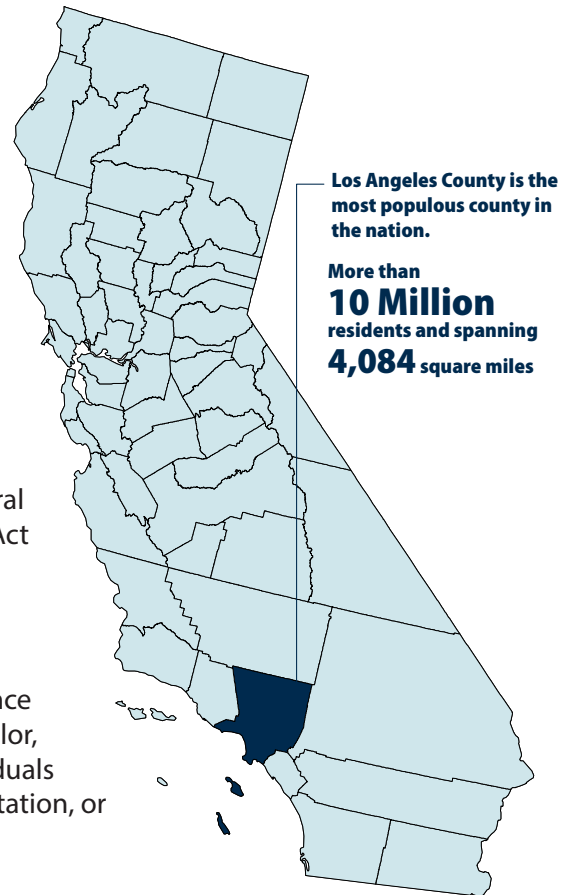
Public Works is committed to complying with Title VI requirements for all programs and services delivered to the public.

I. Introduction

Los Angeles County Public Works' (Public Works) mission is to provide public infrastructure and municipal services to protect and enrich the daily lives of over 10 million people in the County of Los Angeles. More specifically, Public Works is responsible for the design, construction, operation, maintenance, and repair of roads, traffic signals, bridges, airports, sewers, water supply, flood control, water quality, and water conservation facilities, and for the design and construction of capital projects.

Public Works strives to deliver projects, programs, and services in a socially and environmentally responsible manner that ensures the long-term health and well-being of the communities it serves. Public Works receives a wide array of Federal funding from the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and Federal Aviation Administration (FAA). As a recipient of such Federal aid, Public Works is required to comply with Title VI of the Civil Rights Act of 1964 (Title VI) and other nondiscrimination authorities.

Title VI of the Civil Rights Act of 1964 provides that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal assistance from the U.S. Department of Transportation on the grounds of race, color, or national origin. Other non-discrimination authorities protect individuals from discrimination based on sex, age, disability, religion, sexual orientation, or gender identity in federally assisted programs and activities



Public Works is committed to complying with Title VI requirements for all programs and services delivered to the public. This implementation plan serves as a guide and a reflection of Public Works' commitment to preserving civil rights for all individual and group beneficiaries of Public Works programs and services.

This implementation plan provides a general overview of how Public Works will comply with Title VI, including but not limited to:

- Forwarding Title VI complaint to Caltrans.
- Engaging public participation.
- Providing services to Limited English Proficiency populations.
- Training employees and managers in how to provide services and administer programs in compliance with Title VI.
- Increasing local and small business partnerships.
- Implementing the Transit Operations Compliance Report (Appendix I).

II. Policies and Regulations

In accordance with Title VI, Public Works is committed to ensuring that no person shall on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of Public Works' services. Public Works applies these requirements in accordance with County policies and applicable law without regard to whether those services and activities are Federally funded or not.

Title VI protection extends to the following nondiscrimination categories: age, sex, creed, low-income and minority communities, disadvantaged business enterprises, and limited English speakers.

III. County and Department Overview

The County of Los Angeles is one of the largest municipal governments in the nation. It is governed by an elected Board comprised of five Supervisors. The County has over 100,000 employees, 48 departments, and approximately 200 committees and commissions.

The County region is home to over 10 million residents. There are 88 cities and approximately 140 unincorporated areas and communities within its 4,084-square-mile boundary.

Public Works operates 77 field facilities throughout the unincorporated County area as well as contract cities. Public Works is comprised of 37 divisions and approximately 4,000 employees in over 500 job classifications, including professional, technical, clerical, and skilled crafts.

Public Works owns and manages five general aviation airports and is also responsible for designing, constructing, and maintaining the County highway system within its boundary. In addition, Public Works provides transportation services in the unincorporated communities and administers 16 fixed-route services including dial-a-ride services for the elderly and persons with disabilities. Each of these programs receives Federal funding and is subject to this Title VI Implementation Plan.



75%

of the County's population is comprised of a minority race.

IV. Demographics

Compared to the national average for minority populations, the County ranks significantly higher than the national average with 75% of the County's population comprised of a minority race (Table 1). Hispanic or Latino residents make up close to 50% of the minority population in the County. The County is also ranked higher than the national average of people living below the poverty line (Table 2). See tables below for additional details.

Table 1

Race	United States	California	Los Angeles County
White alone, non-Hispanic or Latino	58.9%	34.7%	25.2%
Hispanic or Latino	19.1%	40.3%	49.0%
Black	13.6%	6.5%	9.0%
Asian	6.3%	16.3%	15.3%
American Indian and Alaskan Native	1.3%	1.7%	1.5%
Native Pacific Islander	0.3%	0.5%	0.4%

Source: United States Census Bureau QuickFacts, 2020

Note: Due to rounding, figures may not add to 100%.

Table 2

Other Demographic Data	United States	California	Los Angeles County
Non-English Speaking at Home	21.9%	43.9%	55.8%
Living with Disability	8.7%	6.8%	6.3%
Below Poverty Line	11.5%	16.4%	14.1%
65 Years and Over	17.3%	15.8%	15.2%

Source: United States Census Bureau, 2020

V. Title VI Implementation

Title VI Coordinator

Public Works' Title VI Coordinator is responsible for the overall Title VI program implementation, and performs the lead role in the development and implementation of the Title VI program and coordinating compliance across each division within Public Works. The Title VI Coordinator provides guidance and technical assistance on Title VI matters and has overall program responsibility for preparing reports and developing program procedures, which include:

- Ensuring a prompt resolution of Title VI Inquiries.
- Ensuring prompt forwarding of Title VI formal complaints to Caltrans.
- Collecting demographic data of participants in and beneficiaries of Public Works' Federal-aid programs, activities, and services.



- Identifying program deficiencies and recommending solutions to address them.
- Conducting periodic Title VI audits.
- Verifying that Title VI requirements are not in conflict with policy directives and that Department programs and services have built-in safeguards to prevent discrimination.
- Providing an annual report of Departmental Title VI accomplishments and goals in compliance with applicable law.
- Coordinating or disseminating information to the public in languages other than English, where appropriate.

Title VI Compliance Measures

Public Works has developed a wide range of procedures to meet the general requirements of Title VI. They include the following:

- Posting Title VI notifications at public counters, Internet, etc.
- Publishing public outreach brochures in multiple languages.
- Developing Title VI discrimination complaint procedures.
- Training staff on Title VI law and requirements.
- Providing information on how to access services and programs to Limited English Proficiency (LEP) populations.
- Providing information on services and programs to ensure Disadvantaged Business Enterprise (DBE) involvement.
- Providing information on contract opportunities to minority businesses.
- Meeting environmental justice regulations.
- Adhering to service standards.
- Completing Title VI assurance documentation required for Federally funded projects or programs.
- Adhering to applicable legal authorities for disability access, including disability service standards in the County Policy for Title II (Americans with Disabilities Act).



This Title VI Implementation Plan complies with FAA, FHWA, and FTA requirements.

Notice of Rights

Public Works displays the ‘Notice of Rights’ for public view at customer counters at Public Works headquarters and field locations and on the Public Works website. The notice states that Public Works is committed to complying with Title VI and to ensuring that no person be excluded from the participation in, be denied the benefits of or be otherwise subjected to discrimination under any of our programs, activities, or services.

Examples of Public Works’ Notice to the Public are in Appendices A and E.

Complaint Procedures

Public Works established a Title VI complaint procedure. The procedure is described on the next page.

Los Angeles County Public Works is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, that no person shall be excluded from participation in or be denied the benefits of or be subjected to discrimination under any program or activity on the grounds of race, color, or national origin.

Any person who believes they have been discriminated against should contact:

Celeste Anonas, Title VI Manager
Workforce Support Division

900 South Fremont Avenue, Alhambra, CA 91803
Telephone: (626) 979-5333
Email: TitleVI@dpw.lacounty.gov

For the California Relay Service dial, 7-1-1

The U.S. Department of Transportation, through the Federal Highway Administration (FHWA), provides federal funding to the Los Angeles County Department of Public Works. The FHWA authorizes Caltrans to enforce Local Public Agencies’ Title VI Plans to ensure compliance with FHWA’s Title VI requirements. Caltrans allows Public Works to resolve inquiries internally. If an inquiry becomes a formal complaint, constituents can file a complaint directly with Caltrans at Filing a Title VI Complaint | Caltrans or Public Works can email the complaint directly to Caltrans. Caltrans will then forward it to the appropriate agency, such as the FHWA or the Federal Transit Administration (FTA), for investigation. For other complaints where the Los Angeles County Department of Public Works has jurisdiction and can investigate, Public Works will follow the complaint process below.

Title VI Inquiry/Complaint Procedures

Public Works established a Title VI inquiry/complaint procedure. The procedure is described below.

Any person who believes they have been subjected to unlawful discriminatory practice under Title VI has a right to file a complaint. Any such complaint must be filed in writing with the Public Works Title VI Coordinator within 180 days following the date of the alleged discriminatory action.

The complaint process is available at Public Works' public counters and online. Complaints must be filed in writing and should be directed to:

Los Angeles County Public Works
Workforce Support Division – Title VI Coordinator
900 South Fremont Avenue, Alhambra, CA 91803
Website: <https://dpw.lacounty.gov/general/civilRights/nondiscrimination.shtml>

Complainants will be advised that they may submit their formal complaint to Public Works or to an external Federal agency, such as the FAA, FHWA, and FTA. However, should a formal complaint be filed with Public Works and the Federal agency simultaneously, the Federal complaint will supersede Public Works' complaint and Public Works' complaint procedures will be suspended pending the Federal agency's findings. Every effort will be made to obtain a timely resolution of complaints.

Public Works' Title VI Coordinator will adhere to following Title VI formal complaint procedures:

1. The formal complaint must meet the following requirements to undergo a Title VI investigation:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where a formal complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The coordinator can assist the person in converting a verbal complaint to writing the formal complainant. All complaints must, however, be signed by the complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination, date when the complainant became aware of the alleged discrimination, date on which the conduct occurred, and the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties to the discriminatory activity.
 - d. Formal complaints must be filed within 180 calendar days of the alleged incident in compliance with applicable law.
2. The Public Works Title VI Coordinator will maintain a log of all Title VI complaints identifying complainant's name, factual allegations, alleged harm, basis for the discrimination complaint based on a protected class. Coordinator will maintain a list of formal complaints received.
3. Within 14 business days of receiving the formal complaint, Public Works Title VI Coordinator will determine jurisdiction, sufficiency, and any need for additional information. The coordinator will attempt to contact the complainant if additional information is needed. The complainant will have 60 days from the date of the letter to send the requested information to the Public Works Title VI Coordinator. If the complainant fails to respond as requested, Public Works may terminate the investigation and close the complaint.
4. The Public Works coordinator will assign a formal complaint number, send an acknowledgment letter to the complainant informing him/her that Public Works has received the formal complaint. The acknowledgment letter will include Caltrans' contact information for the complainant to obtain status updates. The coordinator will forward the formal complaint to Caltrans for investigation or to be assigned to the appropriate agency.

5. Within 90 calendar days of receipt of the complaint or requested additional information, the appropriate agency will issue either: 1) a closure letter or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation or there was insufficient evidence to substantiate the alleged violation and that the complaint will be closed. A LOF summarizes the allegations and informs the complainant whether the complaint was found to have merit and it will take appropriate corrective action to remedy the matter.
6. If the complainant is unsatisfied with the decision, he/she may file an appeal with the appropriate Federal agency for their review of the decision.

A person may also file a complaint directly with:

Federal Transit Administration	Federal Highway Administration	Federal Aviation Administration
Civil Rights Division Attention: Complaint Team East Building, 5th Floor – TCR 1200 New Jersey Avenue, SE Washington, DC 20590	U.S. Department of Transportation Office of Civil Rights 8th Floor E81-105 1200 New Jersey Avenue, SE Washington, DC 20590	Office of Civil Rights Attention: Office of the Assistant Administrator 800 Independence Ave., SW Room 1030 Washington, DC 20591

For information or guidance on how to file a complaint directly with Caltrans, or obtain more information regarding Title VI, please contact the Title VI Branch Manager at (916) 639-6392 or visit their Title VI webpage.

Public Participation Plan

Public Works will solicit and consider all opinions from County residents and stakeholders to ensure that projects, programs, and services delivered by Public Works are sensitive to the various demographic backgrounds within the region. Public Works has prepared a Public Participation Plan (PPP) for use by any division to promote public involvement in the planning and decision-making process of projects, programs, and services. The PPP is included under Appendix C.

Limited English Proficiency Plan

Public Works has identified the demographics and specific language needs of the County’s residents and businesses. Based on recent U.S. Census data, most of Los Angeles County’s population speaks a language other than English (see Table 3 on page 12).

Public Works has developed a general Limited English Proficiency (LEP) Plan for use by any division to address the public’s language needs. The LEP Plan outlines how to take reasonable steps for providing language assistance to LEP persons who wish to access services provided by Public Works. The LEP Plan identifies the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. The LEP Plan is included under Appendix D.

To prepare the LEP Plan, Public Works referenced the U.S. Department of Transportation’s four-factor LEP analysis, and has considered the following factors:

1. Number and proportion of LEP persons served or encountered in the eligible service population.
2. Frequency with which LEP persons come in contact with Public Works programs, activities or services.
3. Nature and importance of services provided by Public Works to the LEP population.
4. Resources available to Public Works and overall cost to provide LEP assistance.

The figures on Tables 3 and 4 detail the breakdown of English fluency for people who speak another language and what the top primary languages are in the County.



Table 3

Language Fluency in Los Angeles County

Top Languages	Speak English 'very well'	Speak English less than 'very well'
Spanish or Spanish Creole	57.8%	42.2%
Other Indo-European Language	65.0%	35.0%
Asian and Pacific Island Language	48.7%	51.3%
Other Languages	74.1%	25.09%

Source: United States Census Bureau, 2020

The table below shows the top five primary languages spoken in the country, State, and county.

Table 4

Top 5 Primary Languages Spoken

Population	1	2	3	4	5
California	English 20,540,480	Spanish 4,069,288	Chinese 661,315	Vietnamese 337,940	Tagalog 253,965
United States	English ¹ 245,689,577	Spanish ² 16,759,866	Chinese ² 1,792,095	Vietnamese ² 877,352	Korean ² 567,024
Los Angeles County	English 4,169,105	Spanish 1,468,305	Chinese 211,991	Korean 96,447	Armenian 74,410

Source: U.S. Census Bureau

1. Source: United States Census Bureau, 2020. Individuals who only speak English.
2. Individuals who do not speak English "very well."

The numbers of individuals who do not speak English very well suggests that a significant portion of the County's population will likely require language assistance. Demographic data will be obtained and updated for use to customize programs and services to LEP population.

Training

Public Works is providing Title VI training to all employees in Public Works. Employees will receive this training at minimum every two years. Trainings are offered online or through an instructor-led class. Additional resources are provided on Public Works' website to enhance the learning objectives. The following components are covered to ensure compliance:

1. Review of Public Works' Title VI Policy, PPP and LEP Plans.
2. Types of language assistance services offered to the public.
3. How to handle a potential complaint.
4. Where to seek assistance for Title VI questions and concerns.
5. Some employees will be provided training on DBE and Americans with Disabilities Act compliance, as necessary.

See an example of the Public Works Title VI Resource page posted on the Intranet under Appendix G.

Disadvantaged Business Enterprise

Public Works is committed to increasing the participation of Disadvantage Business Enterprises (DBE) in construction projects and ensuring nondiscrimination in the award and administration of contracts. A DBE is a for profit small business, which is at least 51% owned by one or more socially and economically disadvantaged individuals. Qualified DBEs are minority, women-owned businesses, including firms owned by disadvantaged and disabled veterans.

Public Works is making a committed effort to providing business opportunity information and outreach to ensure DBE involvement. Public Works currently posts a list of contract opportunities on the public website for DBEs to bid on (Appendix H). The website is reviewed and updated annually.

Environmental Justice

In accordance with Executive Order 12898 ("Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations"), Public Works will identify and address the environmental effects of programs, policies, and activities on minority and low-income populations. Public Works will consider demographic data during project design and involve the public in the planning and development process to assess the environmental impacts of projects on the community. The public's input and demographic data analysis will enable Public Works to develop measures to mitigate any potential adverse effects on minority and low-income populations. Environmental Justice compliance will utilize the PPP as attached in Appendix C.

Annual Work Plan

Public Works will annually establish and monitor program goals and maintain a Work Plan. The Title VI Coordinator will ensure that training is conducted, language translation services continue to be available, public participation is optimal, and appropriate Title VI signage is posted. This also includes updating community statistics and corresponding with the Federal agency as necessary. The Annual Work Plan will guide updates to the Title VI Implementation Plan, which shall be updated every three years.



A DBE is a for profit small business which is **at least 51%** owned by one or more socially and economically disadvantaged individuals.

APPENDICES

Appendix A Complaint Form

Appendix B Public Participation Plan

Appendix C Limited English Proficiency Plan

Appendix D Example of Public Notice Posted on Public Internet Website

Appendix E Example of Complaint Process and Form Posted on Public Internet Website

Appendix F Example of Training Resource Website on Employee Intranet

Appendix G Example of Disadvantaged Business Enterprise Information on Public Internet

Appendix H Transit Operations Compliance Report

Appendix I Aviation Compliance Report

Appendix J Federal Highway Compliance Report

APPENDIX A

Los Angeles County Public Works TITLE VI DISCRIMINATION COMPLAINT FORM

Public Works is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, that no person shall be excluded from participation in or be denied the benefits of or be subjected to discrimination under any program or activity on the grounds of race, color and national origin or other non-discrimination authorities that protect individuals from discrimination based on sex, age, disability, religion, sexual orientation, or gender identity in federally assisted programs and activities.

Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact us by calling (626) 979-5333.

Name:	Date of Incident:
Phone:	Alt. Phone:
Your Street Address, City, State & Zip Code:	
Name(s) of person(s) discriminated against (other than complainant):	
Street Address, City, State & Zip Code (other than complainant):	

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

Title VI: Race ___ Color ___ National Origin ___

Other Non-Discrimination Protected Categories: Age ___ Disability ___ Religion ___
Sexual Orientation ___ Gender ___ Gender Identity ___ Other _____

Please describe the alleged discrimination incident. Provide the names and titles of all employees involved, if available. Explain what happened and whom you believe was responsible. Please attach additional pages if required.

APPENDIX B

PUBLIC PARTICIPATION PLAN

As a recipient of Federal funding, the Los Angeles County Public Works (Public Works) adheres to Title VI of the Civil Rights Act of 1964 and has integrated this Public Participation Plan into its Title VI Program. This plan provides guidelines for involving the public to ensure that all groups are represented and their needs considered. Public Works is committed to ensuring it serves the residents and businesses of the County fairly, consistently, and in the most cost-efficient and appropriate manner within available resources.

Goals and Objectives

The goal of Public Works' Public Participation Plan is to offer a variety of opportunities for the public to engage in planning and decision-making activities. The objectives of the plan are as follows:

- To determine what barriers may exist to public participation within the unincorporated County service area, such as language.
- To provide a general notification of meetings for public input, in a manner that is understandable to all populations in the unincorporated service area.
- To hold meetings in locations that are accessible and reasonably welcoming to all area stakeholders, including, but not limited to minority, Limited English Proficiency (LEP), and low-income members of the public.
- To utilize a variety of communication methods to capture public input from populations that are not likely to attend or engage in public meetings.

Environmental Justice

To comply with Executive Order 12898 ("Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations"), Public Works will assess the environmental impacts of projects on the community. By factoring in information on demographic data, minority, LEP and low-income populations, Public Works can develop measures to mitigate any potential adverse project effects on these populations.

Identification of Stakeholders

Stakeholders are those individuals who are either directly or indirectly impacted by Public Works' plan, project, or program. Those individuals who may be adversely affected or who may be denied the benefit of a plan's recommendations are of interest in the identification of specific stakeholders. Project Coordinators will outreach to stakeholders as indicated in the PPP.

Minority Populations

According to the U.S. Census Bureau, there are over 9,721 million residents within the County. The table on the following page provides a demographic breakdown of the County.

Race	United States	California	County of Los Angeles
White alone, non-Hispanic or Latino	58.9%	24.7%	25.2%
Hispanic or Latino	19.1%	40.3%	49.0%
Black	13.6%	6.5%	9.0%
Asian	6.3%	16.3%	15.8%
American Indian and Alaskan Native	1.3%	1.7%	1.5%
Native Pacific Islander	0.3%	0.5%	0.4%

Source: United States Census Bureau QuickFacts, 2020

Note: Due to rounding, figures may not add to 100%.

Compared to the national average for minority populations, the County ranks significantly higher than the national average with 75% of the county's population comprised of a minority race. Hispanic or Latino residents make up close to 50% of the minority population in the County.

Limited English Proficiency Populations

A LEP individual is someone with limited ability to read, write, speak, or comprehend English. Reasonable efforts will be made to engage LEP populations utilizing techniques, such as those outlined in the LEP Plan (Appendix D), which includes the development of public notices in appropriate non-English languages that will provide contact information where individuals can be informed of the affected project or services to provide input and comments. Other efforts may include conducting focus groups in areas with high concentrations of LEP populations for the purpose of gaining input from a particular defined portion of the community. In addition, non-profit organizations and other advocacy groups can be utilized to disseminate information and provide insight into the needs of LEP populations. Public Works will maintain records of outreach to LEP communities.

Low-Income Populations

Public Works will identify low-income populations within the service area. The low-income threshold will be defined as households with a per capita income of 80% or less of the national average. Low-income populations in the unincorporated County areas will be given reasonable opportunity to provide input on plans and programs to avoid disproportionate harm or lack of benefit.

Public Comment Process Offered by the Board of Supervisors

The public may be heard during the regular Board of Supervisors meetings held every Tuesday at 9:30 a.m. The meetings are in the Board's Hearing Room at 500 West Temple Street, Room 381-B, Kenneth Hahn Hall of Administration in Los Angeles. The Lancaster Library is another alternate location to address the board during the regular meeting or hearing. The Lancaster Library is located at 601 West Lancaster Boulevard, Lancaster, CA 93534.

Outreach Efforts

Public Works will also provide the public an opportunity to comment at community meetings and via online platforms. Public Works will engage the community through the County's website, social media, and brochures placed at libraries, community centers, shopping centers, public parks, and recreation areas within the communities. Public Works' staff and/or a contracted non-English interpreter for LEP will attend community meetings to inform residents of Public Works services and provide them an opportunity to express their input in a language they are comfortable communicating in.

List of Community Meetings

3/17/25	Harbor-UCLA Replacement Program, Coastal San Pedro Neighborhood Council (SD2)	3/20/25	Crescenta Valley Town Council (CVTC) Meeting (SD5)
3/18/25	Stevenson Ranch Homeowners Association Meeting (SD5)	3/20/25	Antelope Acres Town Council Meeting (SD5)
3/18/25	Altadena Town Council (ATC) Meeting (SD5)	3/21/25	4th Annual LA Veterans Expo (SD1)
3/19/25	Saybrook Neighborhood Watch Meeting (SD1)	3/22/25	Assessors Disasters Relief Resource Fair (SD5)
3/19/25	Castaic Area Town Council Meeting (SD5)	3/22/25	Tire Collection Event (SD2)
3/19/25	Monrovia Arcadia Duarte Town Council (MAD) Meeting (SD5)	3/22/25	Permanent HHW/E-Waste Collection Event (SD4)
3/20/25	323 Farmers Market: 710 North Mobility Improvement Plan Outreach (SD1)	3/22/25	Cesar Chavez Day of Service (SD1)

APPENDIX C

LIMITED ENGLISH PROFICIENCY PLAN

Introduction

The Los Angeles County Public Works (Public Works) is a recipient of Federal financial assistance and acknowledges that as a condition of receiving these funds, it is required to comply with Title VI of the Civil Rights Act of 1964.

Title VI of the Civil Rights Act of 1964 provides that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal assistance from the U.S. Department of Transportation on the grounds of race, color, or national origin. Other non-discrimination authorities protect individuals from discrimination based on sex, age, disability, religion, sexual orientation, or gender identity in federally assisted programs and activities.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or comprehend English is a type of national origin discrimination. It directs each Federal agency to publish guidance for its respective recipients on how their recipients can provide meaningful access to LEP persons in compliance with Title VI regulations. This order applies to all State and local agencies that receive Federal funds, including Public Works.

Public Works prepared this Limited English Proficiency (LEP) Plan to address the County's responsibilities as a recipient of Federal financial assistance as it relates to the needs of individuals with limited English language skills. A LEP individual is someone with limited ability to read, write, speak, or comprehend English. The LEP Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, and applicable regulations and guidance documentation. Public Works will take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost to the individual.

Limited English Proficiency Plan Summary

Public Works has developed this LEP Plan to help identify reasonable steps for providing language assistance to LEP persons who wish to access services provided by Public Works.

The LEP Plan outlines how to identify a person who may need language assistance; the ways in which assistance may be provided; staff training that may be required; and how to inform LEP persons that assistance is available.



A **LEP individual** is someone with limited ability to read, write, speak, or comprehend English.

Four-Factor Analysis

In order to prepare this LEP Plan, Public Works referenced the U.S. Department of Transportation's (U.S. DOT) four-factor LEP analysis, which considers the following factors:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP persons come in contact with Public Works programs, activities, or services.
3. The nature and importance of services provided by Public Works to the LEP population.
4. The resources available to Public Works to provide LEP assistance.

Based on the four-factor analysis, Public Works developed its LEP Plan as outlined in the following section.

Limited English Proficiency Plan Outline

How Public Works staff may identify a LEP person who needs language assistance:

1. Collect and examine records of language assistance requests (such as call logs from public counters, dispatch, and the general information line) to predict the need for language assistance at future events or meetings.
2. Collect demographic data to determine LEP assistance in our service areas.
3. Survey employees and contractors to record the frequency and type of language assistance requests made by customers.

Public Works will modify outreach strategies based on information gathered and survey results.

Language Assistance Measures

Public Works has numerous language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which Public Works staff and contractor staff respond to LEP persons, whether in person, by telephone, or in writing, including:

- Printed brochures, service notices, and other vital documents in languages as needed.
- Bilingual staff that can assist clients in languages other than English.
- Assistance to LEP persons at community events as needed.
- Public Works has retained contract language interpreters to assist customers in other languages at their call centers.
- Public Works' Internet website content is capable of being translated into approximately 100 languages.



Staff Training

The following training is provided to Public Works staff:

1. Overview of Title VI Policy and LEP Plan.
2. Review of language assistance services offered to the public.
3. Review of how to document language assistance requests.
4. Review of how to handle a potential Title VI/LEP complaint.

Outreach Techniques

When staff prepares materials or schedules a meeting, for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the identified LEP population. Interpreters will also be available as needed for public meetings and through a contracted call center.

Monitoring and Updating the LEP Plan

Public Works will update the LEP Plan as changes are required. Additionally, Public Works will review and update the LEP Plan every three years or when it is clear that higher concentrations of LEP individuals are present in a particular Public Works service area.

Dissemination of Public Works' Title VI Policy and Limited English Proficiency Plan

The Public Works website includes its Title VI Policy, complaint form, and Limited English Proficiency Plan at <http://dpw.lacounty.gov/general/civilRights/>. Any person or agency with Internet access may access and download the documents from the Public Works website. A copy of the documents may be requested by any person or agency via telephone, fax, mail, e-mail, or in person and a copy of the documents shall be provided at no cost.

Questions or comments regarding Public Works' Title VI Policy and Limited English Proficiency Plan may be submitted to:

Title VI Coordinator Administrative Services Division

900 South Fremont Avenue,
Alhambra, CA 91803

Telephone
(626) 979-5333

Email
DPWTitleVI@dpw.lacounty.gov

Website
dpw.lacounty.gov/general/civilRights/

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

“DOT has adopted DOJ’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons 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 translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.”

APPENDIX D

Example of Public Notice Posted on Public Internet Website



[Home](#) / [Non-Discrimination Statement](#)

Non-Discrimination Statement

Los Angeles County Public Works is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity on the grounds of race, color, or national origin.

Any person who believes they have been discriminated against should contact:

Claudia Perez, Title VI Manager
Workforce Support Division
900 South Fremont Avenue, Alhambra, CA 91803

Telephone: (626) 979-5333

Email: TitleVI@dpw.lacounty.gov

For the California Relay Service dial, 7-1-1.

SITE INFO

[ADA Accessibility](#)
[Title VI](#)
[Privacy Policy / Terms of Use](#)

EXPLORE

[Do Business with Public Works](#)
[Organizational Chart](#)
[Careers](#)
[Projects](#)

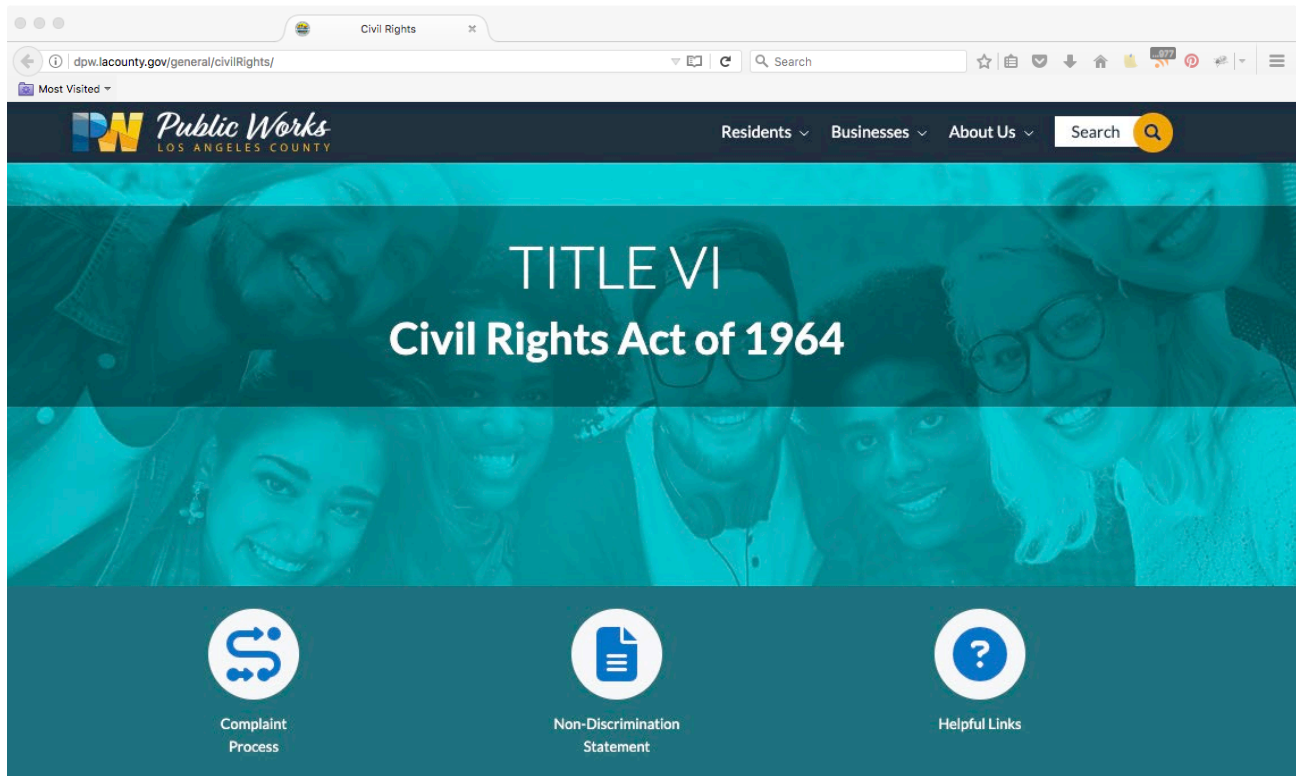
NEED HELP?

[211 LA County](#)
[Contact Public Works](#)
[Public Works FAQ](#)
[Report a Problem](#)
[Submit Feedback](#)



APPENDIX E

Example of Complaint Process and Form Posted on Public Internet Website



[Home](#) / [Complaint Process](#)

Title VI Complaint Process

The U.S. Department of Transportation, through the Federal Highway Administration (FHWA), provides federal funding to the Los Angeles County Department of Public Works. The FHWA authorizes Caltrans to enforce Local Public Agencies' Title VI Plans to ensure compliance with FHWA's Title VI requirements. Caltrans allows Public Works to resolve inquiries internally. If an inquiry becomes a formal complaint, constituents can file a complaint directly with Caltrans at [Filing a Title VI Complaint | Caltrans](#) or Public Works can email the complaint directly to Caltrans. Caltrans will then forward it to the appropriate agency, such as the FHWA or the Federal Transit Administration (FTA), for investigation. For other complaints where the Los Angeles County Department of Public Works has jurisdiction and can investigate, Public Works will follow the complaint process below.

Title VI Inquiry/Complaint Process

Public Works established a Title VI inquiry/complaint procedure. The procedure is described below.

Any person who believes they have been subjected to unlawful discriminatory practice under Title VI has a right to file a complaint. Any such complaint must be filed in writing with the Public Works Title VI Coordinator within 180 days following the date of the alleged discriminatory action.

The complaint process is available at Public Works' public counters and online. Complaints must be filed in writing and should be directed to:

County of Los Angeles Department of Public Works
Workforce Support Division – Title VI Coordinator
900 South Fremont Avenue, Alhambra, CA 91803
Website: <https://dpw.lacounty.gov/general/civilRights/nondiscrimination.shtml>

Complainants will be advised that they may submit their formal complaint to Public Works or to an external Federal agency, such as the FAA, FHWA, and FTA. However, should a formal complaint be filed with Public Works and the Federal agency simultaneously, the Federal complaint will supersede Public Works' complaint and Public Works' complaint procedures will be suspended pending the Federal agency's findings. Every effort will be made to obtain a timely resolution of complaints.

Public Works' Title VI Coordinator will adhere to following Title VI formal complaint procedures:

APPENDIX F

Example of Training Resource Website on Employee Intranet

The screenshot shows a web browser window displaying an intranet page titled "CIVIL RIGHTS Title VI Program". The browser address bar shows "intranet/general/title6/". The page header includes navigation links for "Employee | Services | Department" and a search bar. The main content area features a video player for "Title VI of the Civil Rights Act" with a play button. To the right, there are two tabs: "Mandatory Training" and "Recommended Training". Under "Recommended Training", there are six training modules listed with corresponding icons: "Basic Introduction - Title VI Overview", "Americans with Disabilities Act (ADA) - Disability Protections", "Contract Requirements - Nondiscrimination Requirements on Construction Contracts", "Disadvantaged Business Enterprise (DBE) - DBE Program Overview", "Limited English Proficiency (LEP) - Communicating Effectively with LEP Individuals", and "Transit Services - Title VI Fixed Route Transit Requirements". Below the video and training list, there is a section titled "Other Resources: Links to related Federal codes, guidelines and requirements". This section is organized into three columns: "United States Department of Transportation (DOT)", "Federal Highway Administration (FHWA)", and "Federal Transit Authority (FTA)". Each column contains a list of relevant links. At the bottom of the page, there is a footer with four columns of links: "Intranet Shortcuts", "County Sites", "Internet Shortcuts", and "Contacts".

CIVIL RIGHTS Title VI Program

Title VI of the Civil Rights Act

Title VI Overview

Mandatory Training | **Recommended Training**

- Basic Introduction - *Title VI Overview*
- Americans with Disabilities Act (ADA) - *Disability Protections*
- Contract Requirements - *Nondiscrimination Requirements on Construction Contracts*
- Disadvantaged Business Enterprise (DBE) - *DBE Program Overview*
- Limited English Proficiency (LEP) - *Communicating Effectively with LEP Individuals*
- Transit Services - *Title VI Fixed Route Transit Requirements*

Other Resources: Links to related Federal codes, guidelines and requirements

United States Department of Transportation (DOT)	Federal Highway Administration (FHWA)	Federal Transit Authority (FTA)
<ul style="list-style-type: none"> DOT's Title VI authority (49 CFR Part 21) Executive Order 12898 - Environmental Justice Executive Order 13166 - Language Assistance Disadvantaged Business Enterprise (DBE) program Nondiscrimination on the basis of disability in State and local government services (ADA) 	<ul style="list-style-type: none"> FHWA Title VI program requirements Caltrans Oversight Information Notice: Title VI Compliance by Local Agencies Form 1273: Required Contract Provisions, Federal-aid Construction Contracts 	<ul style="list-style-type: none"> FTA Title VI program requirements FTA Environmental Justice policy guidance

Intranet Shortcuts	County Sites	Internet Shortcuts	Contacts
<ul style="list-style-type: none"> eCAPS Cafeteria Menu iManage 	<ul style="list-style-type: none"> lacounty.gov Other Departments County Intranet 	<ul style="list-style-type: none"> dpw.lacounty.gov Road Closures Dept. of Transportation 	<ul style="list-style-type: none"> Site Feedback Employee Directory Divisional Telephone Listing

APPENDIX G

Example of Disadvantaged Business Enterprise Information on Public Internet

The screenshot shows a web browser window displaying the website for the Los Angeles County Department of Public Works. The browser's address bar shows the URL dpw.lacounty.gov/general/CivilRights/dbe.cfm. The page header features the County of Los Angeles seal and the Department of Public Works logo. A navigation menu includes links for Residents, Businesses, Projects, Online Services, About Us, and Contact Us, along with a search bar. The main content area is titled "Disadvantaged Business Enterprises (DBEs)" and contains the following text:

DPW's DBE Program seeks to ensure nondiscrimination in the award and administration of Federally Funded contracts in the Department's highway, transit, and airport programs and to create a level playing field on which DBEs can compete fairly for contracts. The Department's DBE Liaison Officer is responsible for the oversight of the DBE program and ensuring compliance with DOT's DBE regulations found at 49 CFR Part 26.

Federal Highway Administration

Local agencies in California who administer projects funded by the Federal Highway Administration must follow the Caltrans DBE program. Caltrans requires local agencies to complete and submit Exhibit 9-A, "DBE Implementation Agreement for Local Agencies", and, prior to the beginning of each Federal Fiscal Year, submit Exhibit 9-B, "Local Agency DBE Annual Submittal Form."

[DBE \(FFY 16-17\) - Exhibit 9-B Approved.pdf](#)

Additional Information
Caltrans Office of Business & Economic Opportunity: <http://www.dot.ca.gov/obeo/index.html>

Department of Transportation

Title 49 Code of Federal Regulations Part 26 addresses the participation of Disadvantaged Business Enterprises (DBEs) in DOT Financial Assistance Programs by doing the following:

1. Ensuring nondiscrimination in the award and administration of DOT-assisted contracts for highway, transit, and airport financial assistance programs
2. Creating a level playing field for DBEs to be able to compete fairly for contracts
3. Ensuring that the Department's DBE program is tailored according to applicable law
4. Ensuring that only DBE firms that fully meet the defined eligibility standards are permitted to participate
5. Helping remove barriers for DBE participation in DOT-assisted contracts
6. Promoting the use of DBEs in all types of federally assisted contracts and procurement activities
7. Assisting the development of firms that can compete successfully outside of the DBE program
8. Providing appropriate flexibility, in creating and providing opportunities for DBE's, for those receiving federal financial assistance

The footer of the page contains the following text: [lacounty.gov](#) | [Public Works FAQ](#) | [Privacy](#) / [Terms of Use](#) | [Feedback](#) | [Twitter](#) | [RSS](#) | [YouTube](#)

APPENDIX H

TRANSIT OPERATIONS COMPLIANCE REPORT

Contents

Introduction	29
FTA Certification and Assurances	29
System-Wide Service Standards	29
Vehicle Load Standards	30
Vehicle Headway Standards	30
On-Time Performance Standards	31
Service Availability	31
Vehicle Assignment.	31
Transit Amenities	31
Public Participation Plan.	31
Identification of Stakeholders	32
Minority Populations.	32
Transit Operations Outreach Efforts	33
Limited English Proficiency Plan.	33
Four-Factor Limited English Proficiency Analysis	33
Limited English Proficiency Plan (LEP Plan) Outline.	37
Language Assistance Measures	37
Staff Training	37
Outreach Techniques.	37
Monitoring and Updating the LEP Plan	37
Dissemination of Public Works' Title VI Policy and Limited English Proficiency Plan	38
List of Title VI Investigations, Complaints or Lawsuits	38
Minority Representation on Planning and Advisory Bodies	38
Monitoring Sub-Recipient	38
Determination of Site or Location of Facilities	38
Environmental Justice	38
Exhibit 1	39



Introduction

Public Works provides transportation services in various unincorporated Los Angeles County communities. Administration of these services is assigned to Public Works' Transit Operations Section (Transit Operations). In conjunction with Public Works' Title VI Implementation Plan, this Transit Operations Compliance Report satisfies Title VI program specific FTA requirements.

FTA Certification and Assurances

Public Works incorporated the Civil Rights Assurance and Title VI Assurance in the Annual Certification and Assurance submission to FTA; and Public Works uploaded documents into the TrAMS (Transit Award Management System) database.

System-Wide Service Standards

It is Public Works' policy to provide quality service to all constituents regardless of race, color, national origin, income, or any other category protected by State or Federal law. The following System-Wide Service Standards prepared by Transit Operations establishes standards and policies consistent with FTA requirements for all fixed-route transit services. The following has been prepared to satisfy Title VI of the Civil Rights Act of 1964 and Executive Order 12898 (environmental justice provision), which helps to assure that Transit Operations' services are provided in a non-discriminatory manner.

Public Works provides transportation services within the unincorporated Los Angeles County communities of Acton, Agua Dulce, Athens, Avocado Heights, Baldwin Hills, Bassett, East Los Angeles, East and West Valinda, Florence-Firestone, Hacienda Heights, Lennox, Rowland Heights, South Whittier, Topanga Canyon, Walnut Park, and Willowbrook. Public Works administers 16 fixed-route services utilizing 29 fixed-route vehicles during peak service time.

In addition to the fixed-route services, Public Works provides dial-a-ride services for the elderly and persons with disabilities who reside in the unincorporated Los Angeles County areas. The County directly contracts with paratransit service providers for service in the East Los Angeles, Walnut Park, Whittier, and Willowbrook areas.

Public Works also works with other governmental agencies to finance the County's jurisdictional cost of local transportation services in the unincorporated Los Angeles County area of Antelope Valley, East Los Angeles, Santa Clarita, and Palos Verdes Estates.

Vehicle Load Standards

Public Works' fixed-route service utilizes twenty-five and a half (25.5) foot cutaways and thirty (30), thirty-two (32), and thirty-five (35) foot transit buses. The average of all loads during the peak operating period should not exceed the load factors illustrated in the table below:

Average Passenger Capacities

Vehicle Type	Seated	Standing	Total	Maximum Load Factor
25.5 foot Cutaway	20	10	30	1.5
30 foot Transit Bus	29	13	42	1.45
32 foot Transit Bus	30	15	45	1.5
35 foot Transit Bus	33	18	51	1.55

Vehicle load factors are monitored through daily ridership data to ensure that the routes do not become overcrowded.

Vehicle Headway Standards

Public Works' fixed-route services operate at a frequency of 5 – 60 minutes and cover a long service day with service provided into the evening and on weekends. The frequency of County fixed-route services are illustrated in the table below:

Frequency (minutes)

Fixed Route	Weekday	Saturday	Sunday
Acton/Agua Dulce *	Demand response - varies	Demand response - varies	-
Athens	30	30	-
Avocado Heights/Basset/West Valinda	60	60	-
Baldwin Hills Parkland	-	20	20
East Valinda	50	50	-
Edmund D. Edelman Children's Court	5-15	-	-
El Sol (East Los Angeles)			
City Terrance/ELAC	Rte A 60/Rte B 60	Rte A 60/Rte B 60	Rte A 60/Rte B 60
Whittier Blvd/Saybrook Park	Rte A 60/Rte B 60	Rte A 60/Rte B 60	Rte A 60/Rte B 60
Union Pacific/Salazar Park	Rte A 60/Rte B 60	Rte A 60/Rte B 60	Rte A 60/Rte B 60
Florence-Firestone/Walnut Park	60	60	-
Heights Hopper (Hacienda Heights/Rowland Heights)	90	90	-
King Medical Center			-
Willowbrook Route A	60	60	-
Willowbrook Route B	30	30	-
Lennox	30	30	-
Los Nietos	30	30	-

*Service operates on Monday, Wednesday, and Saturday

Frequency (mintues) (continue)

Sunshine (South Whittier)	60	60	-
Topanga Beach Bus	3 times a day, time varies	3 times a day, time varies	3 times a day, time varies
Wellness Center	15	15	-

**Service operates on Monday, Wednesday, and Saturday*

On-Time Performance Standards

Ninety percent (90%) of all fixed-route trips are operated “on-time,” which is defined as departing from a location no more than ten (10) minutes late from the published schedule.

Public Works utilizes the Fleet Management & Vehicle Diagnostic Devices (AVL/reporting system) to monitor overall and specific route on-time performance.

Service Availability

Public Works provides fixed-route community shuttle services to residents in the unincorporated Los Angeles County communities of Acton, Agua Dulce, Athens, Avocado Heights, Baldwin Hills, Bassett, East Los Angeles, East and West Valinda, Florence-Firestone, Hacienda Heights, Lennox, Rowland Heights, South Whittier, Topanga Canyon, Walnut Park, and Willowbrook. The services enhance mobility by improving the quality of transportation made available to transit-dependent residents and enables patrons to utilize existing community resources. The transit services provide residents access to major shopping areas, public parks, local activity centers, commercial districts, and connectivity to regional transit bus and rail lines. New fixed-route services are developed based on the unmet transit needs of the communities.

Public Works provides dial-a-ride services for the elderly and persons with disabilities who reside in the unincorporated Los Angeles County areas. The service area consists of unincorporated areas of East Los Angeles, City Terrace, Avocado Heights/Bassett, Hacienda Heights, Rowland Heights, South San Gabriel, Whittier Islands, West Covina Islands, Willowbrook, Walnut Park/Florence/Firestone, Athens, Lennox, and Rancho Dominguez. Patrons can also travel up to three miles outside the jurisdictional boundaries.

Vehicle Assignment

Public Works assigns transit buses with higher seating capacity (33-seat) to routes with high ridership. All Public Works transit vehicles are equipped with a wheelchair lift and heating/air conditioning. Higher capacity transit buses are also equipped with bike racks.

Transit Amenities

All bus stops within the unincorporated County of Los Angeles meet the Americans with Disabilities Act requirements regarding the clearance and dimensions for the location of the bus stop amenities. In addition, Public Works is committed to providing its patrons with clean and safe waiting areas. Public Works ensures timely and satisfactory maintenance and custodial services of the bus stops through several service contracts throughout the incorporated communities served.

Public Participation Plan

Transit Operations adheres to Public Works’ Public Participation Plan (Appendix C). Specific information for Transit Operations is provided as necessary.



Identification of Stakeholders

Stakeholders are those individuals who are either directly or indirectly impacted by Public Works’ plan, project, or program. Those individuals who may be adversely affected or who may be denied the benefit of a plan’s recommendations are of interest in the identification of specific stakeholders. Project Coordinators will outreach to stakeholders as indicated in the PPP.

Minority Populations

According to the U.S. Census Bureau, there are over 9,721 million residents within the County. The table on the following page provides a demographic breakdown of the County.

Race	United States	California	County of Los Angeles
White alone, non-Hispanic or Latino	58.4%	24.4%	25.3%
Hispanic or Latino	19.5%	40.4%	48.4%
Black	13.7%	6.5%	9.1%
Asian	6.4%	16.5%	16.0%
American Indian and Alaskan Native	1.3%	1.7%	1.5%
Native Pacific Islander	0.3%	0.5%	0.4%

Source: United States Census Bureau QuickFacts, 2020

Note: Due to rounding, figures may not add to 100%.

Compared to the national average for minority populations, the County ranks significantly higher than the national average with 75% of the county’s population comprised of a minority race. Hispanic or Latino residents make up close to 50% of the minority population in the County.

Transit Operations Outreach Efforts

In addition to Public Works' outreach efforts, Transit Operations staff also regularly attends the Local Transit Subcommittee every other month and the Annual Access Services meetings annually. Public input regarding transportation needs are obtain at community meetings and outreach events.

The following list identifies public outreach events attended by Public Works' staff:

11/10/2022	Florence Firestone Community Advisory Committee Meeting
11/16/2022	East Rancho Dominguez Community Advisory Committee Meeting
1/24/2023	Altadena Coalition of Neighborhood Associations
5/25/2023	Senior Programs and Services Focus group at San Angelo Park
6/17/2023	Juneteenth Celebration Summer Parks After Dark
7/8/2023	Rowland Heights Coordinating Community Council Annual Meeting
10/29/2023	Mulholland Highway Community Outreach
4/10/2024	Agua Dulce Town Council Transit Services (virtual)
5/4/2024	Take Action Event Belvedere Park
5/11/2024	Community Outreach Event at Magic Johnson Park
5/31/2024	Health and Transportation Event at Roosevelt Park
11/2/2024	East Los Angeles Resource Fair at East Los Angeles Civic Center

Since 2024, English and Spanish surveys are permanently available by using a QR Code that is displayed on board of all Public Works fixed-route and dial-a-ride services to help evaluate current services and Transit Operations project manager who researches the complaint and coordinates with the Title VI Manager consistent with the Title VI Plan Inquiry Procedures. Surveys in Korean and Chinese are being developed and will be added to the LAGoBus.com website.

Limited English Proficiency Plan

Transit Operations adheres to Public Works' Limited English Proficiency Plan (Appendix D).

Four-Factor Limited English Proficiency Analysis

1. The number and proportion of LEP persons served or encountered in the eligible service population.

Public Works referenced data from the U.S. Census Bureau (Census), "Selected Social Characteristics in the United States," American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP02, 2022, to gather information regarding the "Languages Spoken at Home," within Los Angeles County. Public Works also referenced the "2020 Census – Demographic Profile," for each Supervisorial District in our service area. The Demographic Profile for each Supervisorial District referenced the U.S. Census Bureau 2016 Planning Database., see exhibits 1 and 2. A Supervisorial District (SD) is a geographically defined area within Los Angeles County, intended to facilitate the planning and delivery of services, including transportation services. The 5 Supervisorial Districts are numbered from 1 to 5. See Exhibit 1 for a map of the Supervisorial Districts.

The "2020 Census – Demographic Profile," provides percentages of Limited English Ages 14+ for each SD. Table 1 on the next page ranks the SD's by their LEP population. Table 2 shows the Top 3 LEP Languages in Los Angeles County. Public Works will conduct ongoing data collection and LEP monitoring.



TABLE 1 – SPA Ranking by LEP Population

SD	SD Population	SD Percentage of LEP Population	SD LEP Population
1	1,982,511	21.4	424,257
2	2,023,783	16.1	325,829
3	2,061,345	12.3	253,545
4	1,896,455	10.5	199,128
5	2,083,832	9.1	189,629

Sources: 2020 Census Profile & LRS Maps for each Supervisorial District

TABLE 2 – Top 3 LEP Languages in Los Angeles County

1	2	3
English	Spanish	Asian and Pacific Islander*

Sources: Selected Social Characteristics in the United States," American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP02, 2022

- The frequency with which LEP persons come in contact with Public Works Transit programs, activities or services.

Public Works serves LEP persons daily via our fixed-routes (shuttles) and paratransit (dial-a-ride) services. Public Works administers 16 shuttles and 3 dial-a-ride services in the unincorporated areas of Los Angeles County.

Tables 3 and 4 summarizes the service, ridership for 2023, and the corresponding SD(s) for each.

Based on the Top 3 LEP Languages in the County and daily contact with LEP riders for shuttle and dial-a-ride services, Public Works will continue to reach out to the Spanish and Asian-Pacific Islander speaking segment of the LEP population.

- The nature and importance of services provided by Public Works to the LEP population.

Public Works provides important transit services to the residents of unincorporated areas in Los Angeles County through its fixed-route and dial-a-ride services. Public Works provides residents, including LEP persons, transportation services for the purpose of commuting to work, medical facilities, social service agencies, school, recreational facilities, and other places.

- The resources available to Public Works to provide LEP assistance.

Public Works has staff available to assist customers in Armenian, Chinese, and Spanish. Public Works also contracts with Language Line Solutions, so staff can assist customers in Arabic, Cambodian, Farsi, Hindi, Japanese, Russian, Tagalog, Thai, and Vietnamese. Our contractors are required to have staff available to assist customers in Spanish at their call centers and onboard some shuttle and dial-a-ride vehicles. Public Works prints brochures, service notices, and other documents in English, Spanish, Korean, and Chinese as needed.

Based on the four-factor analysis, Public Works developed its LEP Plan as outlined in the following section.

TABLE 3 – SHUTTLE SERVICES

Service	2024 Ridership	SD
Acton/Agua Dulce	1,386	5
Athens (the Link)	30,187	2
Avocado Heights/Basset/West Valinda	20,744	1
Baldwin Hills Parklands (the Link)	624	2
East Valinda	23,481	1
Edmund D. Edelman Children’s Court	10,981	1,2,3,4, and 5
El Sol (East Los Angeles)	333,828	1
Florence-Firestone/Walnut Park (the Link)	120,622	2 and 4
Heights Hopper (Hacienda Heights/ Rowland Heights)	27,324	1
King Medical Center (the Link)	19,680	2
Lennox (the Link)	28,404	2
Sunshine (South Whittier)	99,691	4
Topanga Beach Bus	7,321	3
Wellness Center	9,281	1
Willowbrook (the Link)	22,927	2
TOTAL	756,481	

TABLE 4 – DIAL-A-RIDE

Service	2024 Ridership	SD
East Los Angeles	7,802	1
Whittier, Et., Al	16,243	1, 4, and 5
Willowbrook, Et., Al	3,944	2 and 4
Total	27,989	

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

“DOT has adopted DOJ’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons 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 translation obligations.

Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.”

Limited English Proficiency Plan (LEP Plan) Outline

In addition to complying with the Limited English Proficiency Plan (Appendix D), Public Works will identify a LEP person who needs language assistance by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Surveying riders annually to gather information regarding languages spoken by our customers and estimate LEP needs in the service areas.
3. Surveying bus operators and call center staff annually to gather information regarding frequency of language assistance requests and the language requested.

Public Works will modify outreach strategies based on information gathered and survey results.

LEP Plan Assessment

Public Works provides services through contracts which mandate compliance with Title VI and Civil Rights laws. Public Works will monitor our contractors annually to ensure LEP provisions are performed.

Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which Public Works staff and contractor staff respond to LEP persons, whether in person, by telephone, or in writing including:

- Transit Operations prints brochures for fixed-route and dial-a-ride services in English and Spanish.
- Transit Operations prints brochures for fixed-route and dial-a-ride services in English, Spanish, Chinese, and Korean for the Hacienda Heights and Rowland Heights areas.
- Transit Operations has bilingual staff that can assist clients in Armenian, Chinese, and Spanish.

- Transit Operations has access to interpreter services to assist LEP persons via phone or in person.
- Transit Operations contractors have staff to assist customers in Spanish at their call centers and onboard some shuttle and dial-a-ride vehicles.
- Transit Operations networks with local human service organizations that provide services to LEP individuals and seeks opportunities to provide information regarding transportation services.

Staff Training

Training information is provided in Appendix D.

Outreach Techniques

Outreach Techniques are provided in Appendix D.

Monitoring and Updating the LEP Plan

Public Works will update the LEP Plan as changes are required. However, Public Works will review and update the LEP Plan every three years or when it is clear that higher concentrations of LEP individuals are present in the Public Works service area. Updates for 2024 included the following:

- The annual number of contacts with LEP persons.
 - **Update:** *Public Works receives an average of 200 calls a year from LEP persons, primarily Spanish speaking persons for fixed route and dial-a-ride services combined.*
 - **Update:** *Public Works' contractors encounter mainly Spanish speakers on board shuttle and dial-a-ride services and at their call centers. Our contractors provide bilingual staff to handle each type of situation.*
- Determination of the current LEP population in the service area.
 - **Update:** *Public Works updated the LEP population for each service area with data from the "2020 Census Profile & LRS Maps" for each Supervisorial District.*
- How the needs of LEP persons have been addressed.
 - **Update:** *Staff are available to assist LEP callers. All service updates are printed in English, Spanish, Korean, and Chinese as needed for specific service area.*
- Determination as to whether the need for translation services has changed.
 - **Update:** *The need for translation services has evolved to include the LEP population that speaks Spanish, Korean, and Chinese. Public Works will continue to provide printed materials, such as schedules, brochures, and notices in English, Spanish, Korean, and Chinese and to provide interpretation services via phone and as needed at community meetings.*
- Determine whether Public Works has fully complied with the goals of this LEP Plan.
 - **Update:** *Yes, Public Works has fully complied with the goals of this LEP Plan.*
- Determine whether complaints have been received concerning Public Works failure to meet the needs of LEP individuals.
 - **Update:** *No complaints were received.*

Dissemination of Public Works' Title VI Policy and Limited English Proficiency Plan

Dissemination of Public Works' Title VI Policy and Limited English Proficiency Plan information is provided in Appendix D.

List of Title VI Investigations, Complaints or Lawsuits

Public Works has not been involved in any transit-related Title VI investigations, complaints or lawsuits.

Minority Representation on Planning and Advisory Bodies

The Los Angeles County Public Works does not have any non-elected committees and councils. Public Works collaboratively works with Los Angeles County Metropolitan Transportation Authority governing Board, Antelope Valley Transportation Authority Transit Advisory Committee, Foothill Transit and City of Santa Clarita Transit to plan and discuss transit matters.

Monitoring Sub-Recipients

The County of Los Angeles Department of Public Works does not have sub-recipients.

Determination of Site or Location of Facilities

The County of Los Angeles Department of Public Works does not have transit-related facilities.

Title VI Equity Analysis

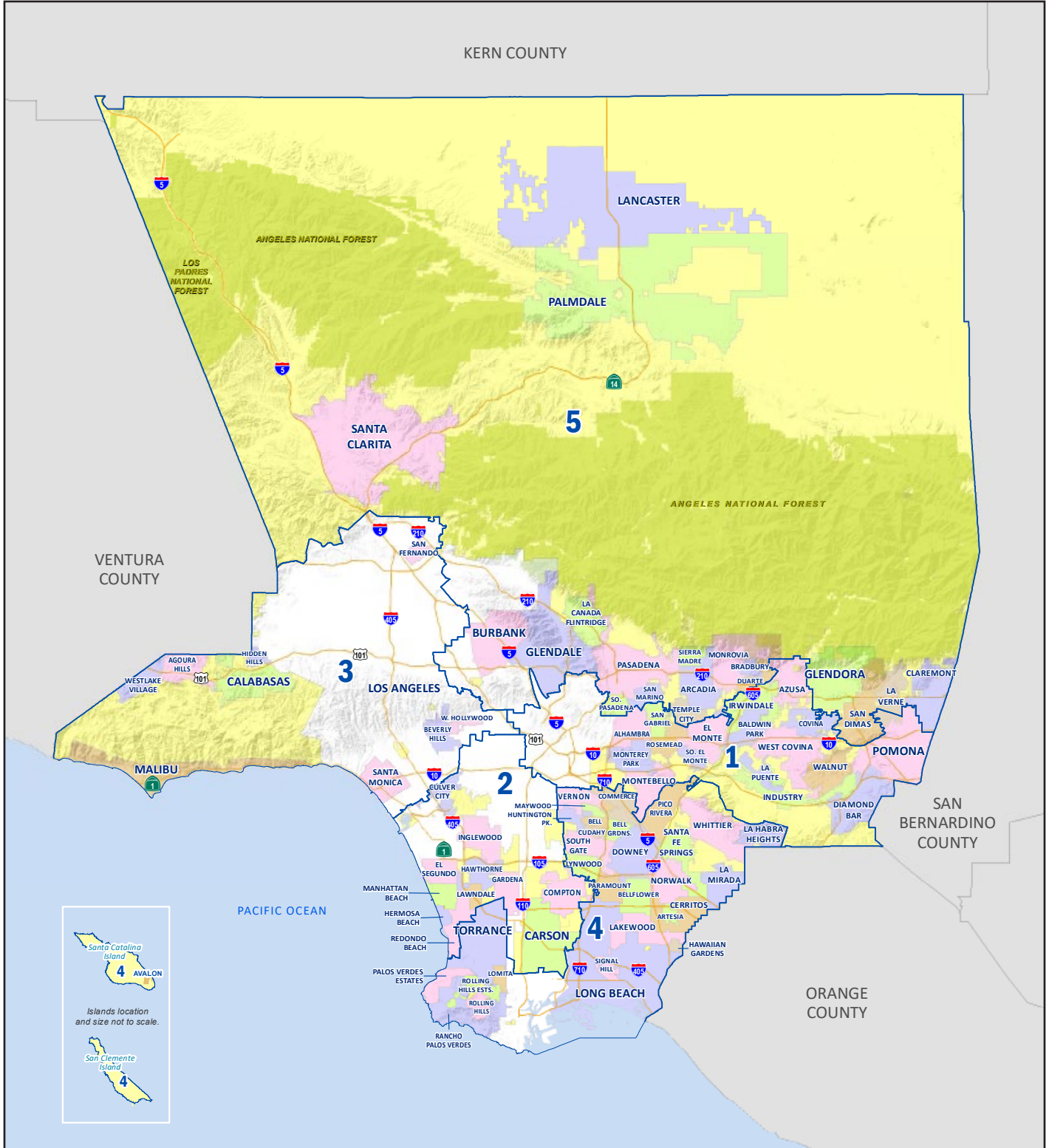
The County of Los Angeles Department of Public Works does not have transit-related facilities.

Environmental Justice

Executive Order 12898 Environmental Justice (issued 1994) – directs Federal agencies to identify and address environmental and human health effects of Federal actions on minority and low-income populations. The Order also promotes nondiscrimination in Federal programs and the provisions of public information and participation by minority and low-income populations. Public Works will accomplish this by analyzing demographic data and involving the public in the planning and development process of transportation projects to get a better understanding of a project's benefits and environmental impact. The public's input and data analysis will enable Public Works to develop measures to mitigate any potential disproportionately high or adverse effects on minority and low-income populations.

Exhibit 1

County Of Los Angeles Supervisorial Districts & Cities



Online Map:

<https://bit.ly/3G6gFek>

- BOUNDARIES**
- Supervisorial Districts
 - Unincorporated Areas
 - Cities
 - National Forest

- TRANSPORTATION**
- Freeway/Highway



Date: 5/11/2022
 SMPM Division, Mapping & GIS Services Section (TMorita)
 Data Sources: Geographic data from eGIS Repository. All rights reserved.
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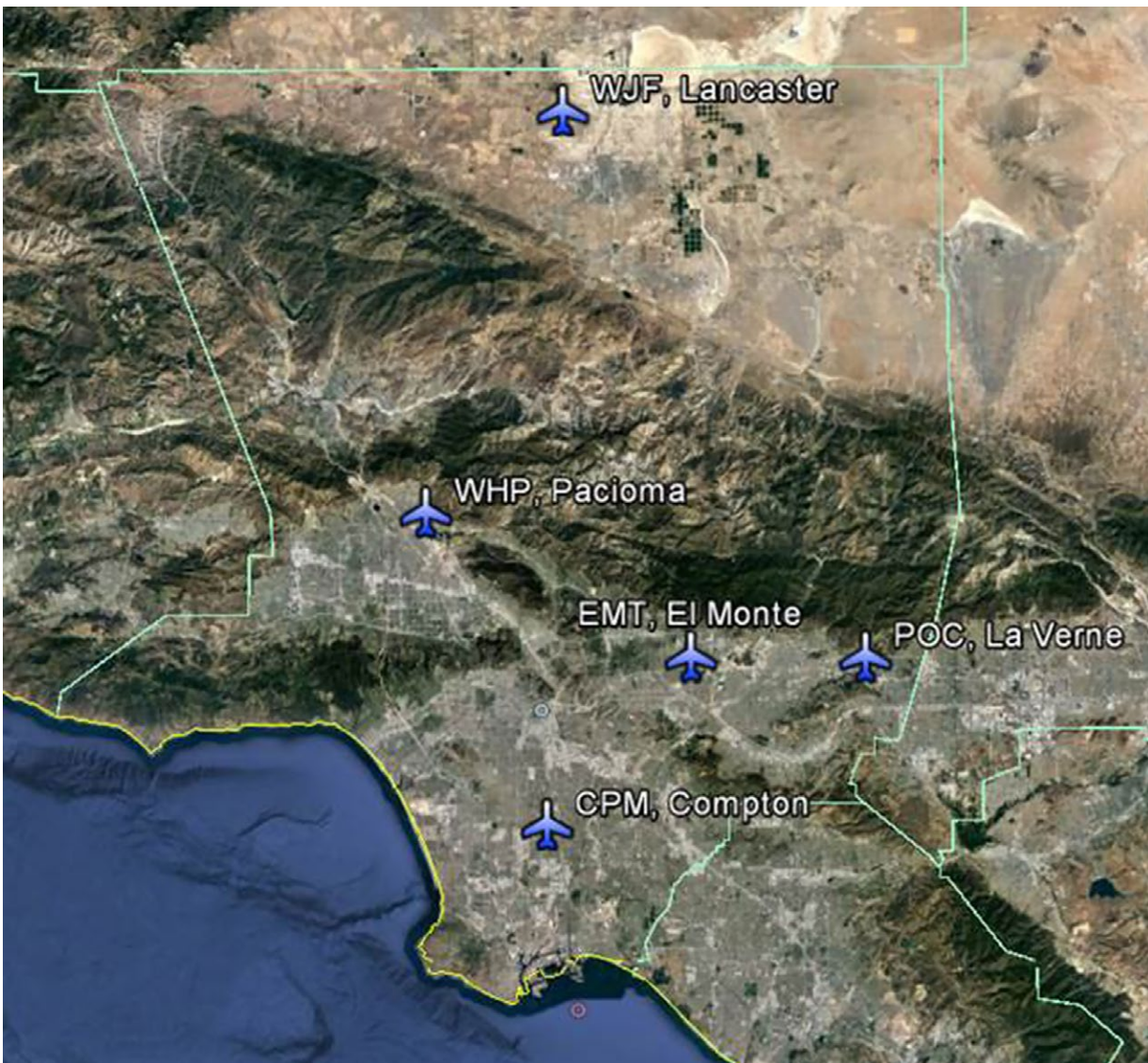
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APPENDIX I

AVIATION COMPLIANCE

Public Works owns and manages five general aviation airports in the County. The Aviation Division is responsible for the planning, development, and administration of the airports. To meet compliance with Title VI requirements, the Aviation Division will adhere to the Title VI Implementation Plan as presented for the five airports below.

- Brackett Field Airport (POC)
- Compton/Woodley Airport (CPM)
- San Gabriel Valley Airport (EMT)
- General William J. Fox Airfield (WJF)
- Whiteman Airport (WHP)



APPENDIX J

FEDERAL HIGHWAY COMPLIANCE

To meet compliance with the Federal Highway Administration, Public Works is committed to adhering to the Title VI Implementation Plan as presented and includes the below contract provisions in their Local Assistance Program Manual (LAPM).

Title VI Construction Contract Provisions

Public Works will include the provisions indicated in the “Administering Agency-State Agreement for Federal-Aid Projects Master Agreement” in the LAPM in contracts and agreements, where applicable, between Public Works and contractors.

Federal-aid construction contracts currently include provisions, which require compliance with Title VI. The specific contract provision language is included in the FHWA Form 1273 that is physically inserted in the Federal-aid construction contract.

The “Local Agency Construction Contract Administration Checklist” (Exhibit 15-A of the LAPM), confirms that DBE and labor/EEO compliance requirements are performed and documented in the project files. Exhibit 15-A of the LAPM documents that the local agency will meet all the requirements prior to the award of a construction contract.

The “Resident Engineer’s Construction Contract Administration Checklist” (Exhibit 15-B of the LAPM), is completed by the Resident Engineer. The checklist assists in administering Federal-aid highway construction projects. It also provides a record that the EEO/Wage Rate/False Statements posters are being posted at specific locations, that employee interviews will be conducted in accordance with the Labor Compliance/EEO interview form, and that DBE requirements are met. Public Works will continue to submit Exhibit 15-B, along with the Award Package shortly after award of the construction contract (See Chapter 15, “Advertise and Award Project”, of the LAPM).





Public Works
LOS ANGELES COUNTY

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