

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
County of Los Angeles Department of Public Works Non-Discrimination Statement	3
I. Introduction	4
II. Policies and Regulations	5
III. County and Department Overview	5
IV. Demographics	6
V. Title VI Implementation	6
Title VI Coordinator	6
Title VI Compliance Measures	7
Notice of Rights	8
Complaint Procedures	8
Public Participation Plan	9
Limited English Proficiency Plan	9
Training	11
Disadvantaged Business Enterprise	12
Environmental Justice	12
Annual Work Plan	12
Appendices	13

Appendix A Notice to the Public

Appendix B Complaint Form

Appendix C Public Participation Plan

Appendix D Limited English Proficiency Plan

Appendix E Example of Public Notice Posted on Public Internet Website

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

Appendix G Example of Training Resource Website on Employee Intranet

Appendix H Example of Disadvantaged Business Enterprise Information on Public Internet

Appendix I Transit Operations Compliance Report

Appendix J Aviation Compliance Report

Appendix K 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 sex, race, color, ancestry, religion, national origin, ethnicity, age (40 and over), disability, sexual orientation, marital status, medical condition, or any other category 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 employee, and every person engaged in business with the County, have an ongoing responsibility to create a nondiscriminatory 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.



County of Los Angeles Department of Public Works

Non-Discrimination Statement

The County of Los Angeles Department of 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 the Department of Public Works, including those receiving Federal financial assistance from the U.S. Department of Transportation, on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, gender identity, or any other category protected by State or Federal law.





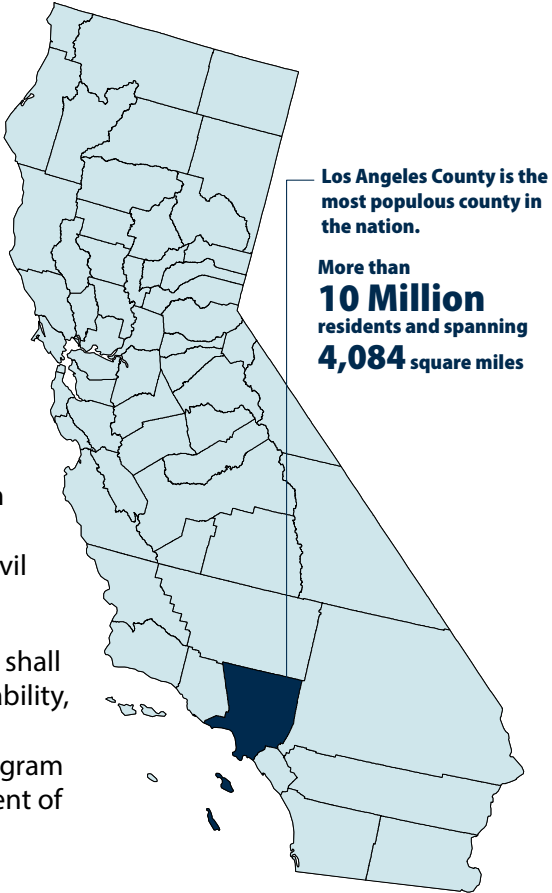
Public Works is committed to complying with Title VI requirements for all programs and services delivered to the public.

I. Introduction

The County of Los Angeles Department of Public Works' (Public Works or Department) 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. The Department 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, the Department is required to comply with Title VI of the Civil Rights Act of 1964 (Title VI) and other nondiscrimination authorities.

Title VI and other nondiscrimination authorities provide that no person shall be excluded on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the U.S. Department of Transportation.



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 the Department's 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:

- Handling a Title VI complaint.
- 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 the Department's services. The Department 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, 37 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. The Department is comprised of 34 divisions and over 3,500 employees in over 500 job classifications, including professional, technical, clerical, and skilled crafts.

The Department 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	61.6%	38.0%	26.6%
Hispanic or Latino	17.6%	38.8%	48.4%
Black	13.3%	6.5%	9.1%
Asian	5.6%	14.7%	15.0%
American Indian and Alaskan Native	1.2%	1.0%	1.5%
Native Pacific Islander	0.2%	0.5%	0.4%

Source: United States Census Bureau QuickFacts, 2015

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	20.9%	43.8%	56.8%
Living with Disability	8.5%	6.7%	6.0%
Below Poverty Line	14.8%	16.4%	18.7%
65 Years and Over	14.9%	13.3%	12.6%

Source: United States Census Bureau, 2015

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 prompt processing and resolution of Title VI complaints.
- Collecting demographic data of participants in and beneficiaries of the Department's 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 below.

Any person who believes they have been subjected to unlawful discriminatory practice under Title VI has a right to file a formal 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.

Complaint forms are available at Public Works public counters and online. Examples of the complaint form are included under Appendices B and F. Complaints must be filed in writing and should be directed to:

County of Los Angeles Department of Public Works
Administrative Services Division – Title VI Coordinator
900 South Fremont Avenue, Alhambra, CA 91803
Website: <http://dpw.lacounty.gov/general/civilRights/>

Complainants will be advised that they may submit their complaint form to Public Works or to an external Federal agency, such as the FAA, FHWA, and FTA. However, should a 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 the following procedures to investigate Title VI complaints:

1. The 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 complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The investigator assigned to the case will interview the complainant and assist the person in converting verbal complaints to writing. 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 was discontinued, 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. Complaints must be filed within 180 calendar days of the alleged incident in compliance with applicable law.
2. Within 14 business days of receiving the complaint, Public Works Title VI Coordinator will determine jurisdiction, sufficiency, and any need for additional information. The Coordinator will send an acknowledgment letter to the complainant informing him/her that Public Works has received the complaint and assigned a complaint number.
 3. The Title VI Coordinator will create and manage 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, and refer the complaint to a Departmental investigator.
 4. The Public Works Coordinator or Departmental investigator will attempt to contact the complainant if more information is needed. The complainant has 60 days from the date of the letter to send 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.
 5. Within 90 calendar days of receipt of the complaint or requested additional information, the investigator 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 that Public Works found the complaint 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.
 7. Public Works will maintain a list of Title VI complaints it receives.

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 the Department 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, the Department 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	55%	45%
Other Indo-European Language	61.9%	38.1%
Asian and Pacific Island Language	48%	52%
Other Languages	68.4%	31.6%

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 19,992,432	Spanish 4,490,408	Chinese 610,934	Vietnamese 316,886	Tagalog 260,443
United States	English ¹ 232,724,203	Spanish ² 16,346,401	Chinese ² 1,659,508	Vietnamese ² 850,087	Korean ² 620,149
Los Angeles County	English 4,032,116	Spanish 1,656,302	Chinese 212,843	Korean 112,411	Armenian 86,432

Source: U.S. Census Bureau

1. 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 the Department. 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.



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



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. The Department 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.

APPENDICES

Appendix A Notice to the Public

Appendix B Complaint Form

Appendix C Public Participation Plan

Appendix D Limited English Proficiency Plan

Appendix E Example of Public Notice Posted on Public Internet Website

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

Appendix G Example of Training Resource Website on Employee Intranet

Appendix H Example of Disadvantaged Business Enterprise Information on Public Internet

Appendix I Transit Operations Compliance Report

Appendix J Aviation Compliance Report

Appendix K Federal Highway Compliance Report

County of Los Angeles Department of Public Works Public Notice

The County of Los Angeles Department of Public Works is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and other discrimination 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 the Department of Public Works on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity.

Any person who believes they have been subjected to unlawful discriminatory practice under Title VI may file a written complaint to Public Works Title VI Coordinator within 180 days following the date of the alleged discriminatory action. The complaint may be submitted in writing. Complaint forms are available at Public Works public counters and online at <https://dpw.lacounty.gov/general/civilRights/>.

Written complaints may be sent to:
County of Los Angeles Department of Public Works
Workforce Support Division – Title VI Coordinator
900 South Fremont Avenue, Alhambra CA 91803

To request an alternative format of this Notice or for additional information on Public Works' nondiscrimination obligations, please contact County Title VI Coordinator by telephone or email using the information below:

Telephone: (626) 458-7901
Email: DPWTitle6@dpw.lacounty.gov

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

Public Notice Locations

The public notice is posted at Public Works headquarters, field locations, Public Works public counters, transit vehicles operated by County's contractors, and County's website at <https://dpw.lacounty.gov/general/civilRights/>.

APPENDIX B

County of Los Angeles Department of Public Works TITLE VI & GENERAL 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, national origin, sex, age, disability, religion, sexual orientation, or gender identity.

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) 458-7901.

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.

County of Los Angeles Department of Public Works
TITLE VI & GENERAL DISCRIMINATION COMPLAINT FORM

Have you filed a complaint regarding this issue with any other Federal, State, or local agencies?

Yes / No (Circle one)

If so, list agency/agencies and contact information below:

Agency:	Contact Name:
Street Address, City, State & Zip Code:	Phone:

Agency:	Contact Name:
Street Address, City, State & Zip Code:	Phone:

Agency:	Contact Name:
Street Address, City, State & Zip Code:	Phone:

By signing below, I confirm that the information on this form is true to the best of my knowledge.

Complainant's Signature

Complainant's Name (Print)

Date

Please return this form to:

County of Los Angeles Department of Public Works
Title VI Coordinator
Administrative Services Division – 9th Floor
900 South Fremont Avenue, Alhambra, CA 91803

APPENDIX C

PUBLIC PARTICIPATION PLAN

As a recipient of Federal funding, the County of Los Angeles Department of 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 10 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	61.6%	38.0%	26.6%
Hispanic or Latino	17.6%	38.8%	48.4%
Black	13.3%	6.5%	9.1%
Asian	5.6%	14.7%	15.0%
American Indian and Alaskan Native	1.2%	1.0%	1.5%
Native Pacific Islander	0.2%	0.5%	0.4%

Source: United States Census Bureau QuickFacts, 2015

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

6/20/19	Vermont Avenue Improvement Project	2/17/21	City Terrace Improvement Community Meeting
1/30/20	Belvedere Park Winter PAD		
1/4/20	Bassett Park Winter PAD	3/8/21	Rowland Heights Community Meeting
1/18/20	3rd Street and Dangler Avenue Community Outreach	3/17/21	Pearblossom Rural Town Council Meeting
1/29/20	Saybrook Improvement Project	5/19/21	Florence-Firestone Chamber of Commerce Meeting
2/25/20	City Terrace Park Community Meeting	7/16/21	Hacienda Heights Community Meeting
9/8/20	West Carson Public Meeting	1/25/22	Altadena Coalition of Neighborhood Association Meeting
12/3/20	Lambert Station First Last Mile Plan		
12/20/20	LA County Transit - Oriented District Toolkit		

APPENDIX D

LIMITED ENGLISH PROFICIENCY PLAN

Introduction

The County of Los Angeles Department of 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 and other nondiscrimination authorities provide that no person shall be excluded, on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the U.S. Department of Transportation.

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) 458-7901

Email
DPWTitle6@dpw.lacounty.gov

Website
dpw.lacounty.gov/general/civilRights/

APPENDIX E

Example of Public Notice Posted on Public Internet Website

The screenshot shows a web browser window with the address bar displaying `dpw.lacounty.gov/general/civilrights/nondiscriminationStatement.cfm`. The page header features the County of Los Angeles seal and the Department of Public Works logo (`dpw.lacounty.gov`). 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 "County of Los Angeles Department of Public Works Title VI Nondiscrimination Statement". The text states: "The County of Los Angeles Department of Public Works, ensures compliance with Title VI of the Civil Rights Act of 1964, as amended to the end 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 receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity." A red line of text reads: "Any person who believes he or she has been discriminated against should contact:". Below this, contact information is provided: "The County of Los Angeles, Department of Public Works, Administrative Services Division, Title VI Coordinator, 900 South Fremont Avenue, Alhambra, CA 91803, Telephone: (626) 458-7901". At the bottom, it says "For the California Relay Service dial 7-1-1". The footer contains links for `lacounty.gov`, Public Works FAQ, Privacy / Terms of Use, Feedback, and social media icons for Twitter, Facebook, and YouTube.




County of Los Angeles Department of Public Works
Title VI Nondiscrimination Statement

The County of Los Angeles Department of Public Works, ensures compliance with Title VI of the Civil Rights Act of 1964, as amended to the end 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 receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity.

Any person who believes he or she has been discriminated against should contact:

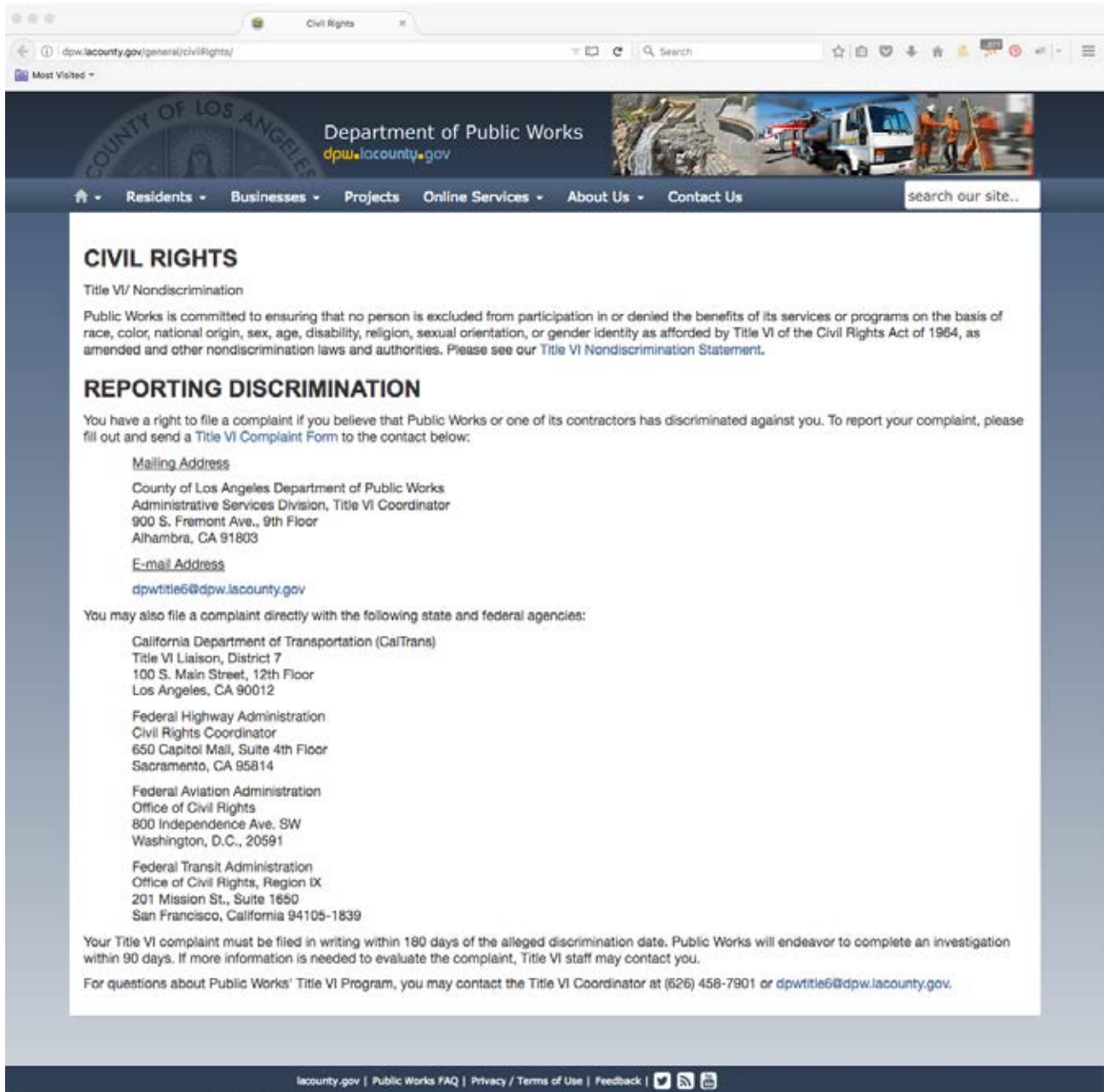
The County of Los Angeles
Department of Public Works
Administrative Services Division, Title VI Coordinator
900 South Fremont Avenue, Alhambra, CA 91803
Telephone: (626) 458-7901

For the California Relay Service dial 7-1-1

lacounty.gov | Public Works FAQ | Privacy / Terms of Use | Feedback |   

APPENDIX F

Example of Complaint Process and Form Posted on Public Internet Website



The screenshot shows a web browser window displaying the Civil Rights page of the Los Angeles County Department of Public Works. The page header includes the County of Los Angeles logo and the Department of Public Works name with the website address dpw.lacounty.gov. A navigation menu contains links for Residents, Businesses, Projects, Online Services, About Us, and Contact Us, along with a search bar. The main content area is titled "CIVIL RIGHTS" and includes a sub-section for "Title VI/ Nondiscrimination". The text explains the Department's commitment to non-discrimination and provides instructions on how to report discrimination, including a mailing address and an email address (dpwtitle6@dpw.lacounty.gov). It also lists state and federal agencies where complaints can be filed directly. The footer contains links to lacounty.gov, Public Works FAQ, Privacy, Terms of Use, Feedback, and social media icons.

CIVIL RIGHTS

Title VI/ Nondiscrimination

Public Works is committed to ensuring that no person is excluded from participation in or denied the benefits of its services or programs on the basis of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity as afforded by Title VI of the Civil Rights Act of 1964, as amended and other nondiscrimination laws and authorities. Please see our Title VI Nondiscrimination Statement.

REPORTING DISCRIMINATION

You have a right to file a complaint if you believe that Public Works or one of its contractors has discriminated against you. To report your complaint, please fill out and send a [Title VI Complaint Form](#) to the contact below:

Mailing Address

County of Los Angeles Department of Public Works
Administrative Services Division, Title VI Coordinator
900 S. Fremont Ave., 9th Floor
Alhambra, CA 91803

E-mail Address

dpwtitle6@dpw.lacounty.gov

You may also file a complaint directly with the following state and federal agencies:

California Department of Transportation (CalTrans)
Title VI Liaison, District 7
100 S. Main Street, 12th Floor
Los Angeles, CA 90012




Federal Highway Administration
Civil Rights Coordinator
650 Capitol Mall, Suite 4th Floor
Sacramento, CA 95814

Federal Aviation Administration
Office of Civil Rights
800 Independence Ave. SW
Washington, D.C., 20591

Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission St., Suite 1650
San Francisco, California 94105-1839

Your Title VI complaint must be filed in writing within 180 days of the alleged discrimination date. Public Works will endeavor to complete an investigation within 90 days. If more information is needed to evaluate the complaint, Title VI staff may contact you.

For questions about Public Works' Title VI Program, you may contact the Title VI Coordinator at (626) 458-7901 or dpwtitle6@dpw.lacounty.gov.

lacounty.gov | Public Works FAQ | Privacy / Terms of Use | Feedback |   

APPENDIX G

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/genera(title6)". The page header includes navigation links for "Employee | Services | Department" and a search bar. The main content area features a video player titled "Title VI of the Civil Rights Act" with a play button, and a sidebar with two columns of training resources: "Mandatory Training" and "Recommended Training". The "Recommended Training" column lists several topics 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 sidebar, there is a section titled "Other Resources: Links to related Federal codes, guidelines and requirements" which lists links for the United States Department of Transportation (DOT), Federal Highway Administration (FHWA), Federal Transit Authority (FTA), and Federal Aviation Administration (FAA). At the bottom of the page, there is a footer with four columns of links: "Intranet Shortcuts" (eCAPS, Cafeteria Menu, Manuals), "County Sites" (lacounty.gov, Other Departments, County Intranet), "Internet Shortcuts" (dps.lacounty.gov, Road Closures, Dept. of Transportation), and "Contacts" (Site Feedback, Employee Directory, Multilingual Telephone Listbox).

APPENDIX H

Example of Disadvantaged Business Enterprise Information on Public Internet

The screenshot shows a web browser window with 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. The navigation menu includes links for Residents, Businesses, Projects, Online Services, About Us, and Contact Us. A search bar is located on the right side of the menu.

Disadvantaged Business Enterprises (DBEs)

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

At the bottom of the page, there is a footer with the following text: lacounty.gov | [Public Works FAQ](#) | [Privacy](#) / [Terms of Use](#) | [Feedback](#) | [Twitter](#) | [RSS](#) | [Print](#)

APPENDIX I

TRANSIT OPERATIONS COMPLIANCE REPORT

Contents

Introduction	27
FTA Certification and Assurances	27
System-Wide Service Standards	27
Vehicle Load Standards	28
Vehicle Headway Standards	28
On-Time Performance Standards	29
Service Availability	29
Vehicle Assignment.	29
Transit Amenities	29
Public Participation Plan.	29
Identification of Stakeholders	30
Minority Populations.	30
Transit Operations Outreach Efforts	30
Limited English Proficiency Plan.	30
Four-Factor Limited English Proficiency Analysis	31
Limited English Proficiency Plan (LEP Plan) Outline.	34
Language Assistance Measures	34
Staff Training	34
Outreach Techniques.	34
Monitoring and Updating the LEP Plan	34
Dissemination of Public Works' Title VI Policy and Limited English Proficiency Plan	35
List of Title VI Investigations, Complaints or Lawsuits	35
Minority Representation on Planning and Advisory Bodies	35
Determination of Site or Location of Facilities	35
Environmental Justice	35
Exhibit 1	36
Exhibit 2	36
Exhibit 3	37



Introduction

Public Works provides transportation services in various unincorporated Los Angeles County communities. Administration of these services is assigned to the Department's Transit Operations Section (Transit Operations). In conjunction with the Department's Title VI Implementation Plan, this Transit Operations Compliance Report satisfies Title VI program specific FTA requirements. Public Works does not have any sub-recipient.

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 the Department uploaded documents into the TrAMS (Transit Award Management System) database.

System-Wide Service Standards

It is the Department's 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.

The Department 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 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 the Department’s 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

Please see Appendix C for minority population data.

Transit Operations Outreach Efforts

In addition to the Department's outreach efforts, Transit Operations staff also regularly attends the following community meetings to obtain public input regarding transportation needs: South San Jose Community Group (South San Jose Hills), Sunshine Neighborhood Watch Group (South San Jose Hills), TRAC Neighborhood Watch Group (Bassett), Pellissier Village Community Group Meeting, Hacienda Heights Improvement Association, Rowland Heights Community Coordinating Council, and Florence-Firestone Community Leaders Group.

Since 2013, English and Spanish surveys are distributed for one week each summer on board of all Public Works' fixed-route and dial-a-ride services to help evaluate current services and satisfaction levels. All complaints/comments are entered into a database and forwarded to the relevant Transit Operations project manager who researches the complaint and coordinates with the Title VI Coordinator consistent with the Title VI Plan Complaint Procedures.

Limited English Proficiency Plan

Transit Operations adheres to the Department's Limited English Proficiency Plan (Appendix D).

Four-Factor Limited English Proficiency Analysis

The below analysis follows the U. S. Department of Transportation four factor LEP instructions.

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

The Department referenced data from the United States Census Bureau (Census) for the unincorporated County service areas and used the data for established Los Angeles County Service Planning Areas (SPA). Please see exhibits 1 and 2. A SPA is a geographically defined area intended to facilitate the planning and delivery of health, social, and children’s services. The 8 SPA areas are: (1) Antelope Valley, (2) San Fernando Valley, (3) San Gabriel Valley, (4) Metro, (5) West, (6) South, (7) East, and (8) South Bay. See Exhibit 3 for a map of the SPAs.

The Census estimates the number of LEP population in Los Angeles County as over 1.4 million, for the population that are five years and over. Table 1 on the next page ranks the SPAs by their LEP population and lists the top three primary languages spoken in each SPA. The Department will conduct ongoing data collection and LEP monitoring.

TABLE 1 – SPA Ranking by LEP Population with the Top Three Primary Languages

Rank	SPA	LEP Population	Top 3 Languages		
			1	2	3
1	2 (San Fernando)	263,250	English	Spanish	Armenian
2	3 (San Gabriel)	259,976	English	Spanish	Chinese
3	4 (Metro)	255,363	Spanish	English	Korean
4	7 (East)	224,185	Spanish	English	Tagalog
5	6 (South)	206,425	Spanish	English	Chinese
6	8 (South Bay / Harbor)	154,400	English	Spanish	Tagalog
7	5 (West)	28,822	English	Spanish	Persian
8	1 (Antelope Valley)	25,677	English	Spanish	Chinese
Total		1,418,098			

Sources: 2012 American Community Survey 5-year estimates, Table B16005 and 2012 American Community Survey 5-year Estimates, U. S. Census Bureau, Table B16001



2. 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 2 and 3 summarizes the service, ridership for 2016, and the corresponding SPA(s) for each.

Based on the ridership numbers for shuttle and dial-a-ride services, the highest ridership is from SPA 7. The primary language of LEP persons in SPA 7 is Spanish. The primary focus for Public Works will continue to be on the Spanish-speaking segment of the LEP population.

3. 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.

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

Public Works has staff available to assist customers in Armenian, Chinese, and Spanish. 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 and Spanish as needed.

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

TABLE 2 – SHUTTLE SERVICES

Service	2017 Ridership	SPA
Acton/Agua Dulce	3,028	SPA 1 Antelope Valley
Athens (the Link)	76,625	SPA 6 South and SPA 8 South Bay
Avocado Heights/Basset/West Valinda	44,248	SPA 7 East
Baldwin Hills Parklands (the Link)	595	SPA 6 South
East Valinda	57,597	SPA 7 East
Edmund D. Edelman Children’s Court	60,552	SPA 7 East
El Sol (East Los Angeles)	891,987	SPA 7 East
Florence-Firestone/Walnut Park (the Link)	219,518	SPA 6 South
Heights Hopper (Hacienda Heights/ Rowland Heights)	9,020	SPA 3
King Medical Center (the Link)	46,537	SPA 6 South
Lennox (the Link)	70,233	SPA 8 South Bay
Los Nietos	5,822	SPA 7 East
Sunshine (South Whittier)	256,230	SPA 7 East
Topanga Beach Bus	6,517	SPA 5
Wellness Center	9,020	SPA 4 Metro
Willowbrook (the Link)	64,007	SPA 6 South
TOTAL	1,821,536	

TABLE 3 – DIAL-A-RIDE

Service	2017 Ridership	SPA
East Los Angeles	17,523	SPA 7 East
Whittier, Et., Al	35,072	SPA 3 San Gabriel and SPA 7 East
Willowbrook, Et., Al	7,743	SPA 6 South and SPA 8 South Bay
Total	60,338	

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.

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 has bilingual staff that can assist clients in Armenian, Chinese, and Spanish.
- Transit Operations provides assistance to LEP persons at community events as needed.
- 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 2017 included the following:

- The annual number of contacts with LEP persons.
 - **Update:** *Public Works receives an average of 200 calls a year from Spanish speaking persons for fixed route and dial-a-ride services combined.*
 - **Update:** *Public Works' contractors encounter 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 Census data from the 2008-2012 American Community Survey 5-year Estimates.*
- How the needs of LEP persons have been addressed.
 - **Update:** *Staff are available to assist Spanish callers. All service updates are printed in English and Spanish.*



- Determination as to whether the need for translation services has changed.
 - **Update:** *The need for translation services has not changed, since the largest identified LEP population speaks Spanish. Public Works will continue to provide printed materials, such as schedules, brochures, and notices in English and Spanish 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 County of Los Angeles Department of 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.

Determination of Site or Location of Facilities

Transit Operations does not have any projects that require land acquisition or displacement of persons from residences and businesses. Transit Operations does not have any constructed facilities or other structures for transit services.

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.

Exhibit 1

Number & Percent of Persons Who Speak English 'not well' or 'not at all' by SPA, Los Angeles County, 2008–2012

SPA	Total*	Speak English 'not well' or 'not at all'
Los Angeles County	9,188,362	1,418,098
SPA1	350,715	25,677
SPA2	1,996,590	263,250
SPA3	1,648,160	259,976
SPA4	1,054,140	255,363
SPA5	611,544	28,822
SPA6	904,201	206,425
SPA7	1,201,865	224,185
SPA8	1,421,147	154,400

*Person 5 years and over.

Source: 2012 American Community Survey, 5-year estimates, Table B16005

Exhibit 2

Language Spoken at Home, Los Angeles County, 2008–2012

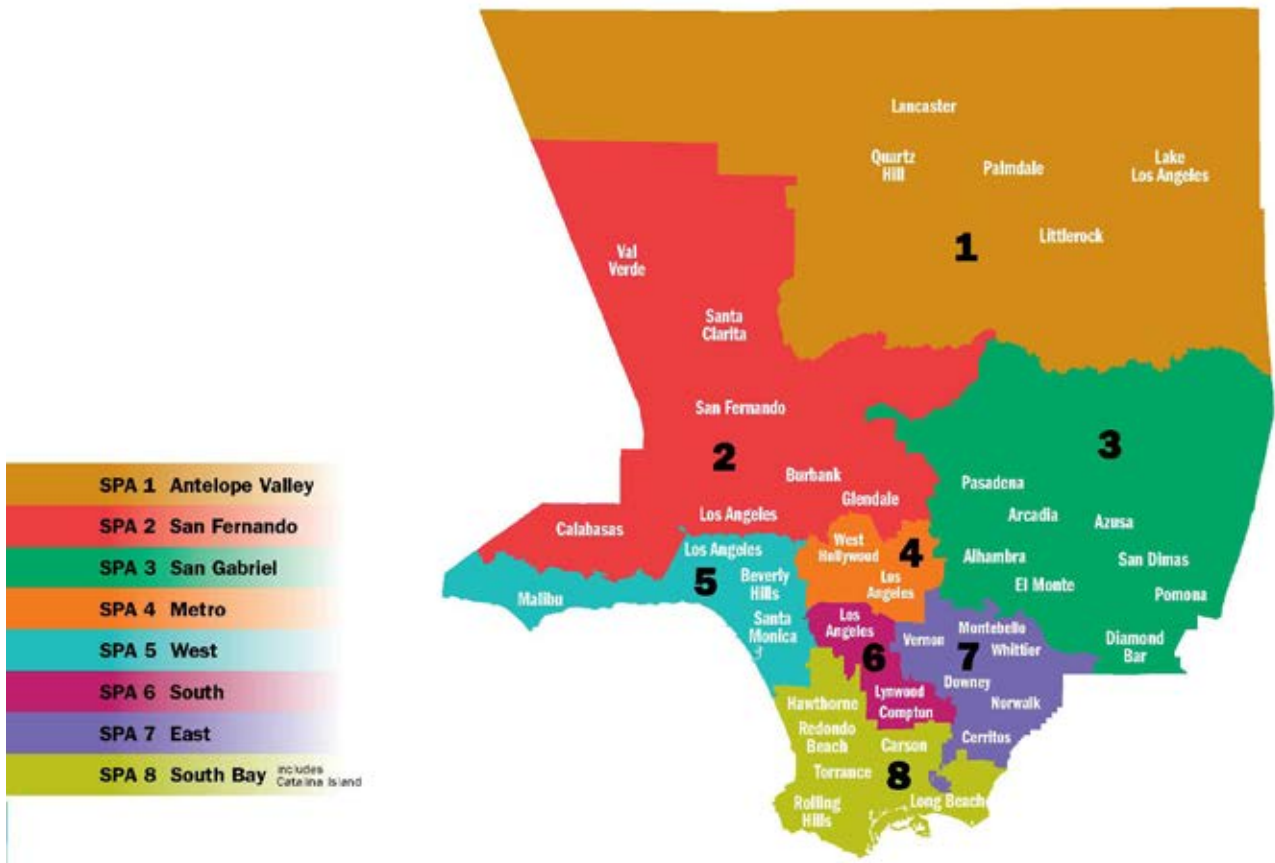
SPA 2012	Los Angeles County		SPA 1		SPA 2		SPA 3		SPA 4		SPA 5		SPA 6		SPA 7		SPA 8	
	Est	Rank	Est	Rank	Est	Rank	Est	Rank	Est	Rank	Est	Rank	Est	Rank	Est	Rank	Est	Rank
Speak only English	3,972,078	1	237,711	1	897,724	1	652,912	1	340,221	2	396,429	1	307,373	2	371,353	2	768,355	1
Armenian	166,402	6	807	6	136,925	3	9,085	6	13,611	6	1,733	7	120	7	2,962	6	1,159	7
Chinese	341,957	3	1,089	4	17,968	7	239,671	3	26,303	5	17,323	4	4,236	3	16,300	5	19,067	5
Korean	186,141	5	815	5	40,124	5	22,661	5	64,637	3	8,692	5	2,787	4	20,627	4	25,798	4
Persian	73,853	7	463	7	33,006	6	3,252	7	2,969	7	28,486	3	338	6	425	7	4,914	6
Spanish	3,620,806	2	97,177	2	647,295	2	559,954	2	494,785	1	80,047	2	572,793	1	722,345	1	446,410	2
Tagalog	229,250	4	4,522	3	65,167	4	44,410	4	38,191	4	5,374	6	1,945	5	25,607	3	44,034	3
Total*	9,188,362		350,715		1,996,590		1,648,160		1,054,140		611,544		904,201		1,201,865		1,421,147	

* Population 5 year and older

Source: 2012 American Community Survey, 5-Year Estimates, U.S. Census Bureau, Table B16001.

Exhibit 3

Los Angeles County Department of Public Health Service Planning Areas Boundaries Map

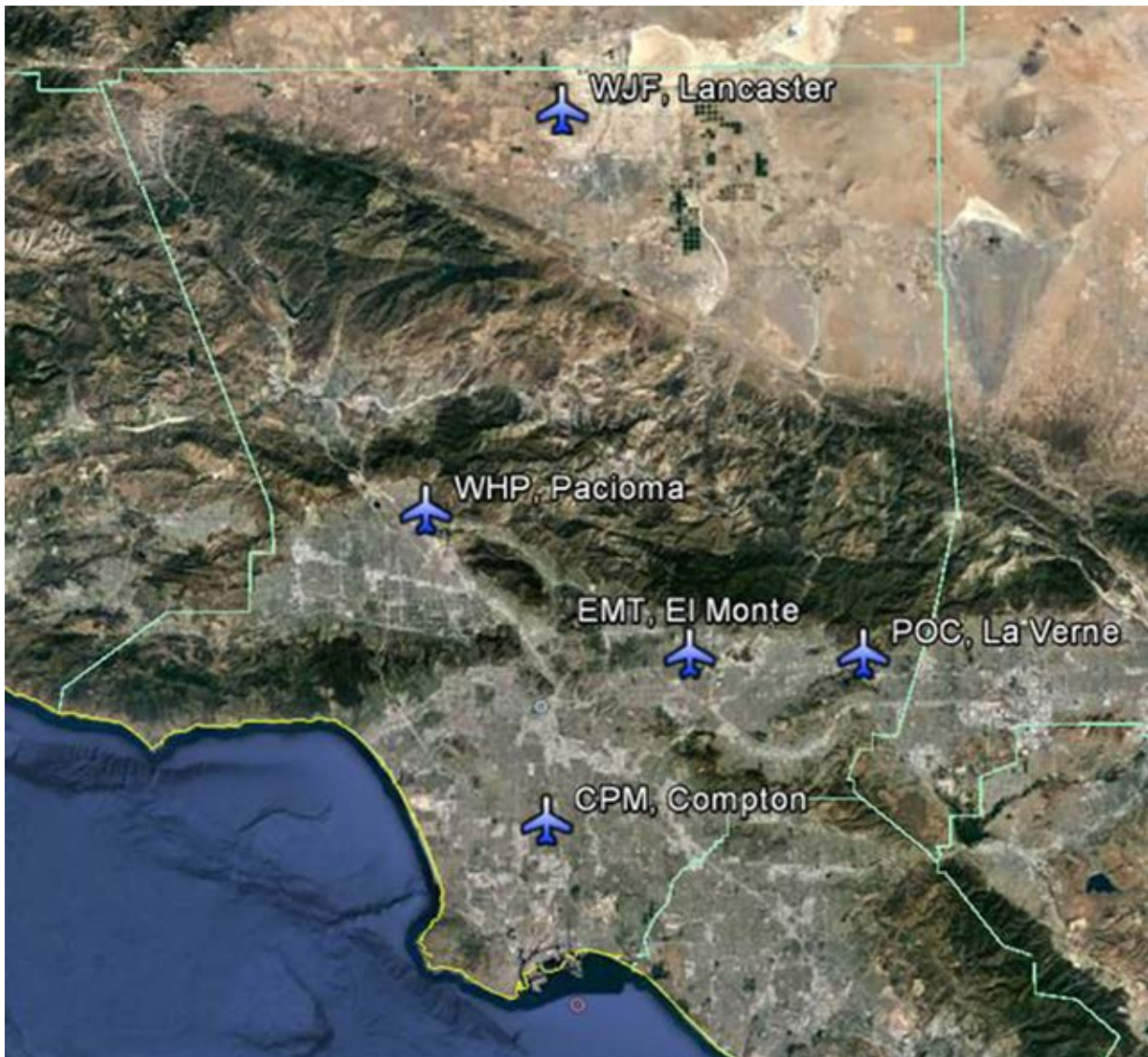


APPENDIX J

AVIATION COMPLIANCE

The Department 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 K

FEDERAL HIGHWAY COMPLIANCE

To meet compliance with the Federal Highway Administration, the Department 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 the Department 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

Los Angeles County Public Works
900 South Fremont Avenue,
Alhambra, CA 91803
dpw.lacounty.gov