

**TITLE VI REPORT  
AND  
LIMITED ENGLISH  
PROFICIENCY  
PLAN UPDATE**

**MARCH 2023 – APRIL 2026**

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## **I. OVERVIEW**

### **A. Purpose**

The Culver City Transportation Department operates a transit system that receives federal financial assistance, and as such, is required to ensure:

- The level and quality of public transportation service is provided in a non-discriminatory manner;
- Full and fair participation in public transportation decision-making is provided without regard to race, color or national origin; and,
- Meaningful access to transit-related programs and activities by persons with limited English proficiency.

These requirements are implemented under the authority of Title VI of the Civil Rights Act of 1964 and applicable federal transit laws contained in Title 49, United States Code, Chapter 53. Additionally, the U.S. Department of Transportation has issued Order 5610.2 (a), "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" and accompanying guidance which describes the process that the Federal Transit Administration (FTA) and other modal agencies will use to incorporate environmental principles into programs, policies and activities.

Title VI regulations are paired with environmental justice (EJ) guidance as both directives require considerations in transportation programs and decision-making to protect minority populations from disproportionate and significant adverse impacts. The EJ principles additionally incorporate low-income populations, without regard to race, color, national origin or limited English proficiency, into these considerations and commit mitigation strategies where disproportionately high and adverse effects are determined.

In addition to the general reporting requirements, this year's update will voluntarily consider FTA procedures for equity analyses for major service changes, fare changes, and public engagement, using the guidance mandated for transit providers that operate 50 or more fixed route transit vehicles in peak service and located in urbanized populations of 200,000 or more people.

## **B. Service Area Description**

Culver CityBus was one of eight municipal transit systems in the Los Angeles region originally eligible to apply for federal grants under the Urban Mass Transportation Act of 1964. Its designation as a federal funding recipient enabled access to subsequent state and countywide transit funds that supported the system's development over the past 90 years. The legacy for transportation innovation started by Culver City leaders in the early 20th century continued into a new millennium with the opening of a state-of-the-art transportation facility and transition to more sustainable fuel sources. Culver CityBus has been a regional leader in advancing new fare technology and was one of the earliest transit systems to use cashless fare collection technology.

In the last decade, Culver CityBus introduced its first Bus Rapid Transit (BRT) line on Sepulveda Blvd. and expanded its service eastward to interface with Metro's E Line (formerly Expo) Light Rail Transit (LRT) Culver City Station. These service improvements are the foundation for the next decade of transit enhancements that are being developed to achieve its vision of:

- *Rethinking Mobility* - building on the success of our fixed route and paratransit services, expanding on other public service transportation options to reduce the demand for automobile ownership, reduce traffic and improve air quality.
- *Connecting Communities* - improving options for mobility within the core Culver City community and extending mobility options to surrounding communities within its service area.
- *Enhancing Quality of Life* - developing public transportation services that enhance life satisfactions including physical health, family, education, safety, economic and environmental elements.

The diversity of transportation solutions that define Culver City's service delivery and enhancements strategy reflects the diversity of the community it serves. The Title VI General Reporting Requirements presented in the following chapters demonstrate how the transit system will continue to comply with provisions that ensure equity in accordance with regulatory and environmental justice policy guidance.

The Culver CityBus total service area encompasses 33 square miles with census tracts overlapping this area totaling approximately 439,000 people. The racial and ethnic breakdown of this population is shown below in Table 1. On the following page, Figure B.1 shows the percentage of the minority

population by census tract.

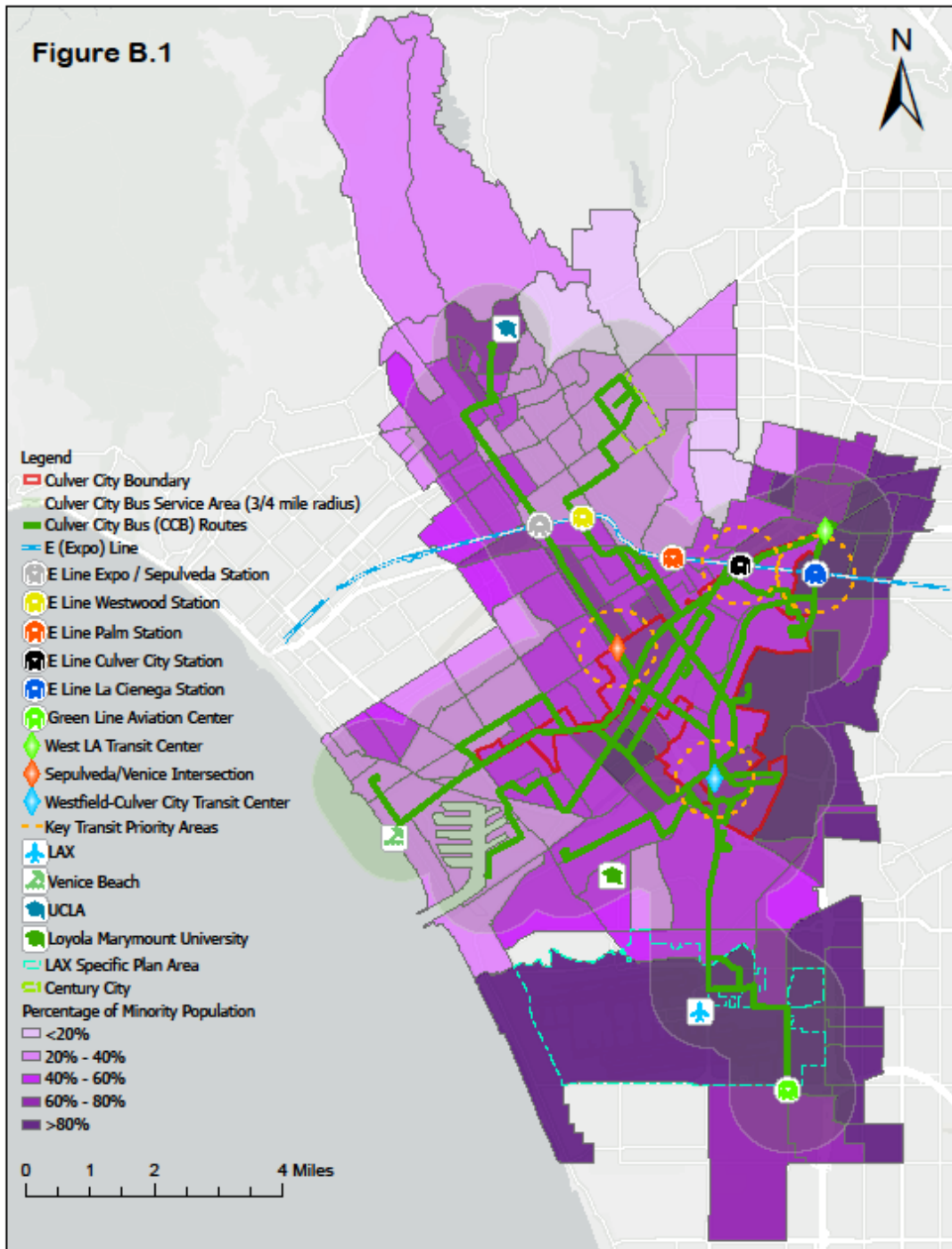
<b>Table 1. Bus Service Area Population Percentage by Race and Ethnicity</b>				
<b>White</b>	<b>Hispanic or Latino</b>	<b>African Am</b>	<b>Asian</b>	<b>Am Indian and Alaska Native</b>
47.4%	23.7%	8%	14.3%	0.2%
<b>Native Hawaiian and Other Pacific Islander</b>	<b>Other Race</b>	<b>Two or More Races</b>	<b>Total Minority</b>	<b>Total Non-Minority</b>
0.2%	0.9%	5.4%	52.6%	47.4%
Source: U.S. 2020 Decennial Census				

### **C. Culver City Bus Service Description**

#### *Fixed-Route Service*

Culver CityBus operates seven fixed-route local bus routes and one Bus Rapid Transit line. Culver CityBus’ service area encompasses Culver City and the Los Angeles communities of Century City, Marina del Rey, Mar Vista, Palms, Playa Vista, Rancho Park, Venice, West Los Angeles, Westchester, and Westwood. Service runs from the University of California at Los Angeles (UCLA) to the north, to the Metro Green Line Station to the south, and from West L.A. Transit Center to the east, to Venice Beach to the west. Culver CityBus service also connects with the E Line (formerly Expo Light Rail Line) at La Cienega, Culver City, Sepulveda, and Westwood stations.

### Percentage of Minority Population in Census Tracts Serviced by CCB



Sources: U.S. Census Bureau, 2020 Decennial Census Redistricting Data (PL 94-171);  
City of Culver City; Los Angeles County Metropolitan Transportation Authority

In FY 2022, the Department’s total fleet was comprised of 44 New Flyer 40-foot, low-floor compressed natural gas (CNG) buses and ten New Flyer 40-foot,

low-floor electric buses with a total average fleet age of 6.7 years. In FY 2022, Culver CityBus added three 18-foot electric vehicles to its fixed route fleet and replaced one 20-foot Dial-A-Ride vehicle with an electric vehicle.

Culver CityBus coordinates its service schedules with surrounding transit providers including the Los Angeles County Metropolitan Transportation Authority (Metro), Santa Monica’s Big Blue Bus, and the City of Los Angeles Department of Transportation (LADOT) in a joint effort to develop a functional regional transportation plan and provide riders with an easy commute throughout the west side of Los Angeles and to a variety of surrounding locations.

In FY 2021, Culver CityBus operated 44 peak hour buses and provided public transportation for 1.7 million unlinked passenger trips annually. Culver CityBus operated 1.5 million annual vehicle revenue miles and 126,179 annual revenue service hours. Table 2 provides the peak frequencies of service by day for all Culver CityBus routes.

**Table 2: Service Days and Operating Frequencies by Route**

Route	Description	Peak Frequency (in minutes)		
		Weekday	Saturday	Sunday
1	Washington Blvd: West Los Angeles Transit Center to Venice	15	15	20
2	Inglewood Blvd: Slauson/Sepulveda to Venice High School	60		
3	Crosstown: Mesmer/Centinel to Century City	20-25	30	30
4	Jefferson Blvd: West Los Angeles Transit Center to Westfield Culver City Transit Center	40-45	45	
5	Braddock Dr: School Tripper to Venice HS	60 (Operates three times per day with limited stops/school days only)		
6	Sepulveda Blvd: UCLA to Metro Green Line	18	20	20



<b>6 Rapid</b>	Sepulveda Blvd: UCLA to Metro Green Line	30 (Midday peak only)		
<b>7</b>	Culver Blvd: Robertson/Venice to Fisherman's Village	40-45		
Source: Culver City Bus Schedules (2021)				

*The Impacts of COVID-19 on System Performance*

Consistent with regional and national trends, the pandemic has significantly impacted Culver CityBus system’s ridership and overall system performance. FY 2021 ridership experienced a 50% decline from FY 2020. While FY 2022 reflected a modest recovery over the prior year, ridership is estimated to remain below pre-pandemic levels in FY 2023.

*Paratransit Services*

The Culver City Transportation Department oversees operation of the City's Paratransit Program that provides transportation services for senior and disabled residents. The paratransit program consists of a Dial-a-Ride service and a taxi coupon program. These services are not funded by Federal funds, but by revenues from other local funding sources issued to the City of Culver City.

Dial-a-Ride service operates within the City of Culver City as well as the Kaiser-Permanente medical facilities located at 6041 Cadillac Ave. and 5620 Mesmer Ave. The service operates Monday through Friday 8:30 a.m. - 4:15 p.m.; donation fares are accepted. The Dial-a-Ride service is operated with three City vehicles and has two City employees assigned as drivers.

The taxi coupon program supplements the Dial-a-Ride program for approved participants. By working with local taxicab companies, the program allows participants to book trips at a subsidized rate, allowing for lower costs and more flexibility. Participants can travel on trips originating or ending in Culver City, or in the nearby unincorporated communities of View Park, Windsor Hills, or Ladera Heights. Participants purchase coupons for use on taxicab trips. Each coupon is worth \$1.00, and taxi drivers are required to accept a maximum of \$10.00 in taxi coupons per trip. If the fare exceeds the \$10.00 coupon limit, the participant must pay the balance of the fare.

In addition to these services, Access Services provides federally mandated complementary paratransit services within and around the Culver CityBus service area.

## **D. Culver City Commitment to Environmental Justice**

The guiding principles of environmental justice (EJ) pursuant to FTA guidance are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

### *Culver City General Plan 2045*

To demonstrate its commitment to these EJ goals, Culver City reiterated its commitment to equitable planning for future generations in its vision and guiding principles for its General Plan 2045 Update. The core values that define Culver City's culture and provide a sense of direction for General Plan implementation are:

- Equity and Inclusion
- Sustainability
- Innovation and Creativity
- Compassion and Community

The Plan's guiding principles for mobility are to build more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected transportation and mobility options for people of all ages and abilities. It intersects with other social equity principles that include health equity, climate action, and urban ecology. These principles also foster advancement of racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and marginalized populations.

### *Culver CityBus Short Range Mobility Plan*

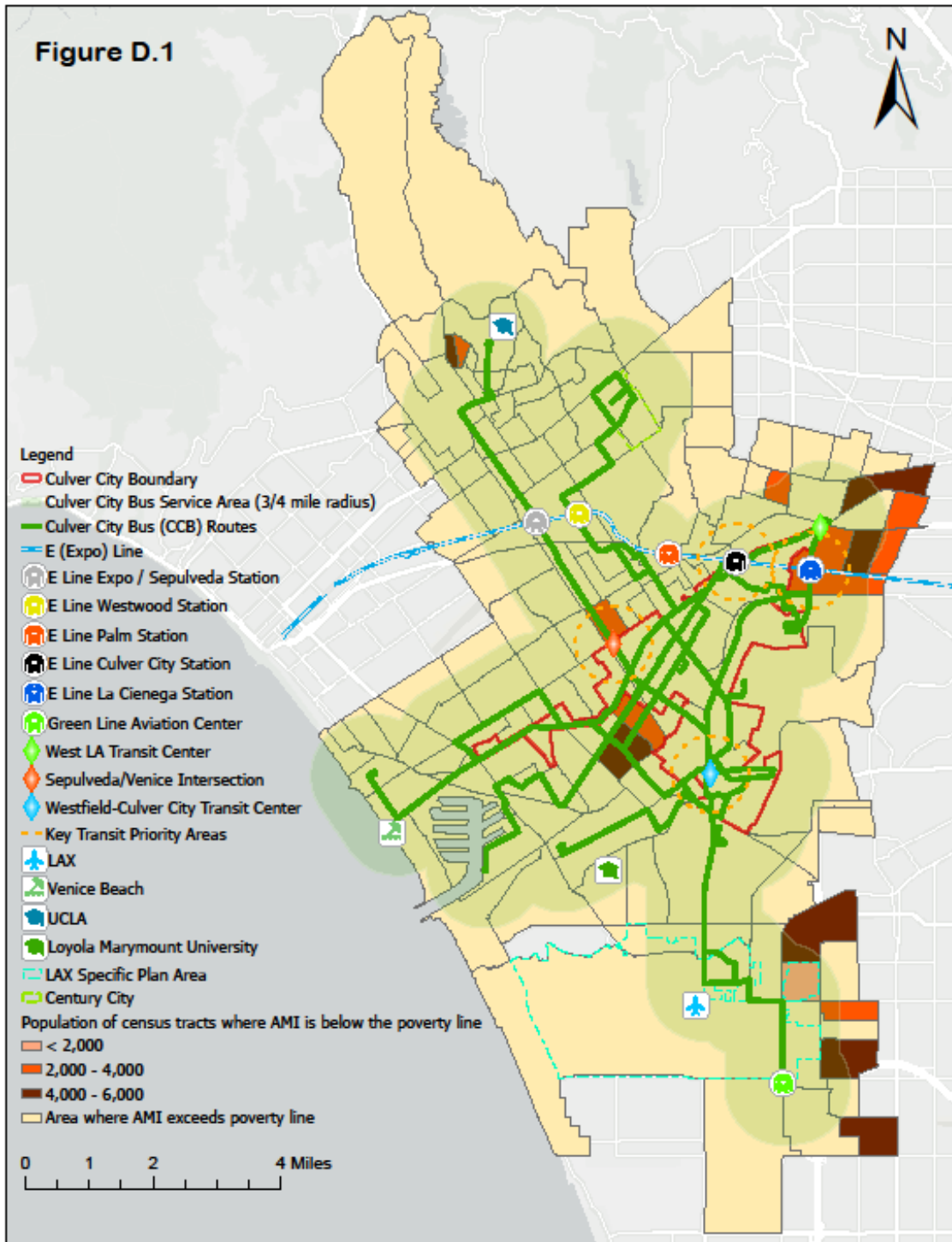
The transit system's FY2022-2026 Short Range Mobility Plan expanded on its strategy of rethinking mobility by articulating the joint role of multiple city departments to facilitate, plan and monitor long-term mobility goals through

recommending and implementing city policies. It defines major efforts to improve overall services categorized to include:

- Development of a citywide mobility vision
- A prioritization process for mobility projects
- Coordination with the City General Plan Update
- Citywide coordination of mobility projects, such as (but not limited to):
  - Transportation Demand Management programs
  - Electric vehicle public infrastructure plans
  - Vehicle utilization and electrification
  - MOVE Culver City Downtown Mobility Lane
  - Jefferson Corridor Circulation
  - Mobility Hubs and E Line Culver Station Reimagined
  - Bicycle and Pedestrian Action Plan
  - Bike Share
  - Hayden Tract Pedestrian/ Bike Bridge
  - Fare Equity, including Mobility-as-a-Service (Maas) App

The commitment to environmental justice extends throughout the service area, including areas identified on the following map as low-income populations (Figure D.1). Many of the census tracts identified as containing higher concentrations of low-income populations are within or adjacent to transit priority areas or activities that will continue to benefit from the service enhancements being implemented by the system.

### Low-income Population in Census Tracts Serviced by CCB

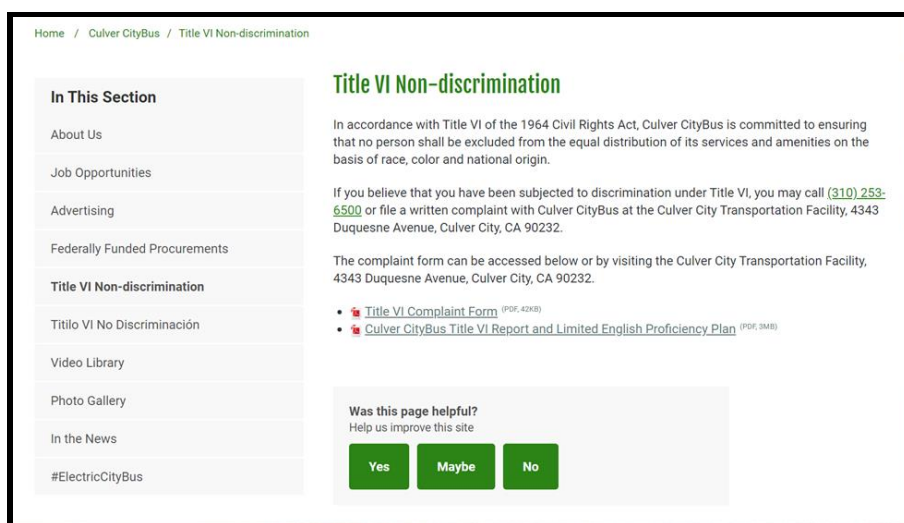
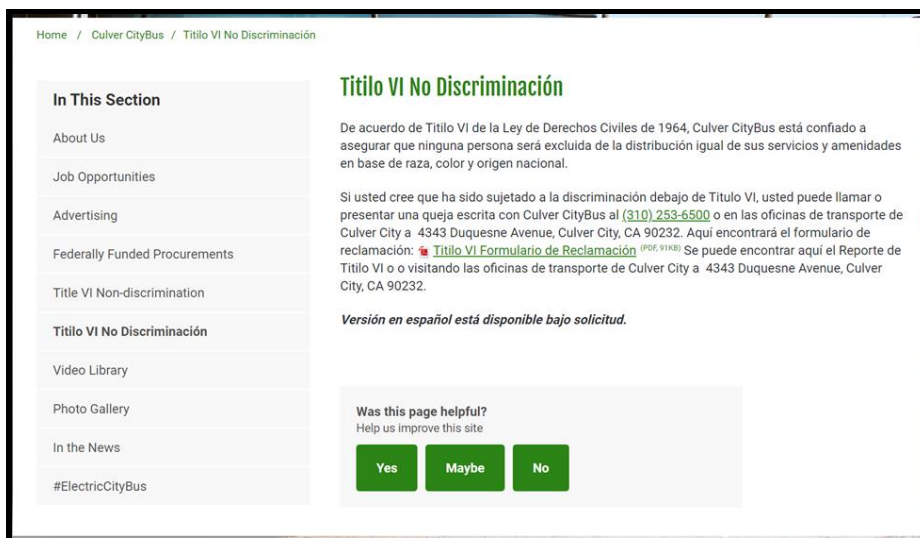


## II. GENERAL REPORTING REQUIREMENTS

There were no sub-recipients for this reporting period that received Federal financial assistance from the FTA through Culver CityBus.

### A. Public Notification of Culver CityBus Title VI Protections

It is Culver CityBus' Title VI responsibility to inform the public of its obligations through a public notice that details their Title VI complaint procedures. The Culver CityBus published notification is shown below.



The bilingual notification has been available to the public since 2011 and is annually updated. It is also posted in every Culver CityBus revenue vehicle, at the service counter of the Transportation Department, in the lobby of City Hall and on the Culver CityBus website.

The Culver CityBus Title VI complaint form and procedures are linked to the notification on the website and available in hard copy format at the Culver CityBus facility location. The form may be submitted either by mail or delivered in person to the following address: Attention Title VI Coordinator, 4343 Duquesne Avenue, Culver City, CA 90232. The notification is also linked to the system's full *Title VI Report and Limited English Proficiency Plan*.

## **B. Culver CityBus Complaint Investigation Procedures**

Please refer to Appendix B for a full copy of the Culver CityBus Title VI complaint forms in English and Spanish, and the Culver CityBus Title VI Complaint Investigation procedures.

## **C. List of Active Lawsuits**

There are currently no active lawsuits or complaints against Culver CityBus alleging discrimination on the basis of race, color or national origin arising from the service provided. There are also no active investigations involving Culver CityBus being conducted by the FTA or any other entity alleging discrimination on the basis of race, color or national origin. Additionally, there have been no complaints or investigations alleging such discrimination by Culver CityBus within the past three years.

## **D. Compliance Review Activities**

No local, state or federal agency (other than the FTA during the triennial review process) has conducted a civil rights review on Culver CityBus in the last 3 years.

## **E. Signed Assurances**

The signed FTA assurances (Appendix A) were submitted through the FTA's web-based grants administration system, TRAMS, on \_\_\_\_\_, and in compliance with current reporting requirements.

## **F. Construction Impact Analysis**

Culver CityBus has operated from its original yard facility since 1934. When the facility underwent a major renovation in the mid-1990s, an Environmental Impact Report was prepared resulting in a Finding of No Significant Impact from construction of a new administration and maintenance building on the existing site. In FY 2023, there are plans to improve the existing facility to incorporate the electrification infrastructure necessary to support its fleet conversion to

electric vehicles. There are currently no plans to relocate any facility functions that would require preparation of a Title VI Equity Analysis.

## **G. Information Dissemination**

All announcements for public hearings are given wide distribution through the use of updated mailing and e-mail address listings inclusive of community groups and concerned individuals. In addition, these notices are posted on the website and as “take-ones” in all Culver CityBus buses and at City Hall. The public can also dial the city’s telephone number or access the city’s website to get updated information regarding city business affairs.

Culver CityBus also submits a service change proposal to the Los Angeles County Metropolitan Transportation Authority (Metro) for review if the change (1) involves in excess of 25% of the revenue service provided on a bus route; (2) duplicates in excess of 2% of another operator’s service; or (3) will be funded with Proposition A or C Local Return funds.

As stated above, when Culver CityBus proposes any major service changes, the system must meet formal notification and public hearing requirements. To briefly summarize the requirements, Culver CityBus must provide formal notification of what changes are proposed to each jurisdiction affected by service changes and allow each respective authority 90 days to respond. A public hearing must also be held to provide public input and feedback on the proposed service changes.

These and further requirements are contained in:

The Los Angeles County Metropolitan Transportation Authority  
“Service Notification Policy – Measures and Public Sharing  
Procedures for Major Service or Fare Changes”

U.S. Department of Transportation, Federal Transit  
Administration, Circular C 9030.1B Urbanized Area Formula  
program: Grant Application Chapter 5.5 (O), “Public comment  
of Fare and Service Changes”

U.S. Department of Transportation, Federal Transit  
Administration Triennial Review Guidelines “Public Comment on  
Fare and Service Changes.” Washington, DC, 1997

During this dissemination period, Culver CityBus staff are confident that all the system riders, including minorities, senior citizens, the disabled, and limited English proficiency populations, will be thoroughly apprised of any

proposed service changes and will have opportunities to influence service-planning decisions as they arise.

Under the new Title VI guidance, transit providers with 50 or fewer peak period service buses are not required to conduct a fare equity or service change analysis. However, any impacts of these types of changes to persons of minority or low-income status as defined by the FTA are considered. Culver CityBus provides an opportunity for public comment and this feedback is considered prior to the implementation of any fare or service changes as detailed in their future fare and service change methodology (see Appendix C).

## **H. Limited English Proficiency Implementation Plan**

Culver CityBus' updated Limited English Proficiency Assessment and Implementation (LEP) Plan, which continues its assurance of meaningful access to transit services and programs for persons with limited English proficiency, is located in Appendix D. The plan was previously updated in March 2022.

## **I. Public Participation Plan**

Culver CityBus recognizes the importance of involving the public in the planning and implementation of transit services and programs. The goals of the Culver CityBus public involvement plan are to ensure that:

- Residents are given the opportunity to fully participate in the transportation planning activities.
- The issues and concerns of residents are given consideration in the transportation investment decision making.
- Potential adverse impacts from transportation projects or programs are identified and mitigated to the extent possible, without regard to race, ethnicity or income level.

### Public Participation Principles

The following principles are used to develop the Public Participation Plan for Culver CityBus projects and programs:

- Public meetings and formal hearings will be advertised in the community through printed materials onboard buses (e.g., interior cards, flyers, and/or comment cards) describing the proposed changes, as well as at major transit stops, on the Culver CityBus website and social media platforms, local print media, and at local community centers throughout



the service area.

- Culver CityBus will provide notifications of meetings, particularly forums for public input, in both English and Spanish and offer language assistance services for other LEP populations as described in its LEP Plan.
- Public meetings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public, including LEP communities.

## **J. Minority Representation on Decision Making Bodies**

Culver City does not have an exclusive commission or policy board to set policies for Culver CityBus operations, other than the City Council. The Transportation Department meets regularly with the standing Mobility, Traffic and Parking Subcommittee of the City Council to review and obtain feedback on developing mobility plans and programs in preparation for consideration by the full Council.

City Council and Mobility, Traffic and Parking Subcommittee meetings both provide a public venue for comments and feedback regarding fare, service and other policies related to transit delivery. City Council meetings are held twice per month and create a venue for riders and members of the public to have an opportunity to comment publicly regarding Culver CityBus services. The City Council is an elected body representing, reflecting and accountable to the diverse community it serves.

## **K. Summary of Public Outreach and Involvement Activities**

Over the past three years, Culver CityBus has engaged the community in the following programs and activities through its regular meetings of the Mobility, Traffic and Parking Subcommittee and other outreach efforts:

FY 2019/ 2020

1. Outreach focused on students at the Culver City Unified School District (CCUSD) and higher education institutions in the service area, including West Los Angeles College, Loyola Marymount Colleges and the University of California, Los Angeles include marketing campaigns to introduce the use of new smart phone applications which are integral to the system's real time technology, *Next CCBus*. CCUSD efforts included beginning a dialogue with stakeholders to explore free fare options for low income students and transportation support for after-school

programs.

2. Focus groups have been held to test real-time data and promote the Culver City SmartBus Project and the systems website has been modified to expand access to real-time information.
3. Culver CityBus, in collaboration with the City's Public Works and Community Development Departments conducted a transit lane feasibility study to identify options for all major corridors in Culver City.
4. Completed its Fleet Electrification Feasibility Report which explored fuel options for future vehicle purchases and associated infrastructure needs.

#### FY 2020/2021

In October 2020, the *Move Culver City* project was implemented to pilot bus and bicycle mobility lanes on three major transit corridors. Following adoption of the final design by the City Council, mobility lanes and associated amenities were implemented in June 2021.

The project was driven by a robust and comprehensive community engagement process consisted of:

- multiple roundtable meetings and workshops with community stakeholders, including residents and businesses,
- the creation of a Community Project Advisory Committee (CPAC) to enable stakeholders and experts to provide technical expertise on the project,
- a project website which provides information and updates to the community, and
- expanded use of technology outreach, using social media and virtual focus groups with over 100 community efforts, multiple mailings reaching 10,000 community residents and over 30,000 social media hits.

#### FY 2021/2022

1. In August 2021, Culver City implemented the *GoPass* free fare program for CCUSD students, in collaboration with L. A. Metro and CCUSD.

2. In September 2021, the City Council adopted the Long-Term Transportation Electrification Transition Plan to guide the Transportation Department to implement a 100% zero-emission fleet by 2028.
3. Culver CityBus, in collaboration with other City Departments launched the quick-build mobility lane pilot for the Downtown corridor in November 2021. Using its outreach network established in FY 2021, the project team has adjusted the lane design based on feedback and observations, as well as evaluating project performance based on criteria established for the pilot.
4. The Transportation Department enhanced its interdepartmental mobility collaboration efforts by expanding its three-year Short Range Transit Plan into a comprehensive five-year Short Range Mobility Plan to place greater focus on the City's broader multimodal mobility objectives.

### **III. PROGRAM SPECIFIC REQUIREMENTS**

Culver CityBus operated 44 peak hour fixed route buses during the reporting period and as a result is mandated by FTA Circular (FTA C 4702.1B) to only detail the system-wide service standards and policies as part of Section III of the report.

#### **A. Service Standards and Policies**

Culver CityBus has adopted quantitative system-wide service standards for its fixed route services. These standards, which are summarized below, were developed and implemented to help Culver CityBus better achieve equity for all its transit customers in service design and operations decisions. There have been no changes to Culver CityBus service standards during the past three years. These standards were reviewed with the most recent transit system Line-by-Line Analysis completed in 2015.

#### **B. Service Standards**

##### *Vehicle Load*

Vehicle load is the ratio of passengers on the vehicle to the number of seats on the bus. Culver CityBus measures the vehicle load at the maximum load point on each route during peak and off-peak periods. The Culver CityBus policy is to maintain vehicle load factors at or below 125%. To prevent the load factors from being exceeded, Culver CityBus has created three trippers to ease any overcrowding on their busiest lines.

### *Vehicle Headway*

Vehicle headway is the measurement of time between buses on a line. Culver CityBus operates fixed-route service with vehicle headways between 15-60 minutes during weekday peak periods, during weekday off-peak periods and on weekends.

### *On-Time Performance*

Culver CityBus defines on-time performance for fixed route bus trips as those trips that arrive at a time point location no earlier than 1 minute before the time listed on printed schedules, and arrives at the time point no later than 5 minutes from the scheduled time. Culver CityBus identified their on-time performance standard in the 2015 Line-by-Line Analysis. To enhance customer experience and improve perceived on-time performance, Culver CityBus upgraded bus technology and installed a real time arrival information system in 2020. The agency also recently implemented a tactically dedicated bus-bike lane in Downtown Culver City to maximize transit benefits and improve travel time and on-time performance. In addition, Culver CityBus is implementing a bus signal priority system at all signalized intersections within Culver City limits, with a projected completion date set for late 2022.

### *Service Availability*

Service availability corresponds to the provision of transit service on major traffic corridors in the service area and access to high population centers and trip generators in urbanized areas. Culver CityBus provides fixed-route service primarily to people who reside within one-half to one-quarter mile of the stops along the routes. Due to the large and varied number of municipal operators that include Santa Monica's Big Blue Bus, LADOT, and the Los Angeles County Metropolitan Transportation Authority (Metro), who also provide services at or near many Culver CityBus bus stops, patrons have many options to access public transportation and Culver CityBus. The many operators in the region also coordinate regularly to reduce unnecessary duplication of routes and increase a more even distribution of transit services. Culver CityBus provides riders with many opportunities to access the more regional transit systems and hubs for a seamless transit experience. With the implementation of the completed Metro Exposition Line in the service area, Culver CityBus has procured additional buses to broaden feeder bus service to the new stations. Additionally, Culver CityBus has altered its service availability due to expanded and new developments in its service area. The Playa Vista mixed use development, Metro E Line Phase 2 extension, West Los Angeles College expansion, and Los Angeles International Airport expansion, all affect service

demand, local traffic generation, and scheduling, and service has been altered in response.

### **C. Service Policies**

Culver CityBus has adopted quantitative system-wide service policies for its fixed-route services. These policies, which are summarized below, were developed and implemented to help Culver CityBus better achieve equity for all its transit customers in service design and operations decisions. There have been no changes to Culver CityBus service policies during the past three years.

#### *Distribution of Transit Amenities*

Transit amenities such as bus benches are provided as a convenience to passengers. The placement of transit amenities is guided by the *Culver CityBus Standards for New and Existing Bus Stops* (February 2005). These standards govern the spacing, location, design and operational aspects of bus stops and bus furniture placed at Culver CityBus stop locations. Generally, bus stops are placed no more than 1,000 feet apart (stops may be closer in commercial and downtown Culver City areas). Benches are placed at high-volume bus stops within the Culver CityBus service area as well as bus stops where there is less frequent service and identified high levels of usage by senior and disabled patrons. At bus stops outside the city of Culver City, the local jurisdiction determines the placement of transit amenities. The older stop furniture is in the process of being replaced along with roadway and sidewalk improvements. Partial funding has been acquired for this effort and along with ongoing efforts the remaining funds will be secured.

#### *Vehicle Assignment*

With regards to vehicle assignment, Culver CityBus assigns vehicles on an "available" basis with no specifically assigned vehicles to specific routes. The exception is the thirteen (13) buses designated for Line 6 Rapid services; these buses are identified with a specific paint scheme/ branding to indicate they are providing service to that line only. This ensures that no geographic location is preferred over another.

Culver CityBus strives to supply its customer base with well-maintained, clean burning CNG vehicles that are ADA compliant by intending to replace all buses after their 12-year life span. This ensures that riders are supplied with newer vehicles for the near future. Characteristics of the Culver CityBus fleet beginning in June 2021 are listed in Table 3. Culver City is in the process of replacing all CNG buses with battery-electric buses 2028, beginning with ten electric buses added to the fleet in FY2021 and FY 2022. All new buses will be

ADA compliant.

**Table 3: Fleet Characteristics**

<b>Culver City Municipal Bus Lines Fleet Inventory - June 2020</b>				
Year Built	Manufacturer	Seats	Length	Total Vehicles
2011	New Flyer	37	40	4
2012	New Flyer	37	40	16
2014	New Flyer	40	40	6
2016	New Flyer	40	40	18
2021	New Flyer	40	40	4
2022	New Flyer	40	40	6
<b>Totals</b>				<b>54</b>

Source: National Transit Database, FY2020

#### **IV. CONCLUSION**

This report fulfills the compliance reporting requirements for Title VI as detailed in FTA Circular 4702.1B. The report detailed the Culver CityBus services, long-range planning efforts and general reporting requirements mentioned in the circular. The program specific requirements were addressed with a profile of their service standards and policies along with a description of the Culver CityBus fleet. The results demonstrate that Culver CityBus serves a diverse population and supplies public transportation equitably to all classified races, ethnicities, and income levels.

**APPENDIX A:**

**CULVER CITYBUS FTA**  
**TITLE VI**  
**CERTIFICATIONS AND**  
**ASSURANCES**

# CULVER CITY, CITY OF | Culver | 1647

Summary Applications/Awards TRAMS Users Locations Designated Recipient **Related Actions**

## Certifications & Assurances | FY 2021 C&A Affirmations

### Recipient Details

Recipient ID  
1647

Recipient Name  
CULVER CITY, CITY OF

### Certification and Assurance Information

Fiscal Year 2021  
Assigned Date 1/15/2021  
Due Date 4/15/2021

Original Certification Date 2/24/2021  
Latest Certification Date 2/24/2021

### Published Certifications and Assurances

FTA CERTIFICATIONS AND ASSURANCES

#### Public Transportation Agency Safety Plan (PTASP)

Applicants and recipients of Section 5307 grants and rail transit agencies that are subject to the State Safety Oversight Program must certify to Category 2: Public Transportation Agency Safety Plans (PTASP). The deadline for certification was July 20, 2020, however, in light of the extraordinary challenges presented by the COVID-19 public health emergency, FTA issued a Notice of Enforcement Discretion for the PTASP regulation (49 CFR Part 673). FTA will refrain from taking enforcement action until July 21, 2021 for applicants and recipients unable to certify compliance with the PTASP regulation before July 20, 2021. While applicants and recipients are encouraged to certify compliance as soon as reasonably practicable under the current circumstances caused by the COVID-19 public health emergency, those who do not certify compliance until July 20, 2021 remain eligible for Chapter 53 grant funds.

List of All Applicable Agencies

PTASP Technical Assistance Center

### Certifications and Assurances

#### Certification History

Certification Date: 2/24/2021 | Official: Serena Wright | Attorney: Heather Baker

Category	Title	Cer
01	Certifications and Assurances Required of Every Applicant	✔
02	Public Transportation Agency Safety Plans	✔
03	Tax Liability and Felony Convictions	✔
04	Lobbying	✔
05	Private Sector Protections	✔
06	Transit Asset Management Plan	✔
07	Rolling Stock Buy America Reviews and Bus Testing	✔
08	Urbanized Area Formula Grants Program	✔
09	Formula Grants for Rural Areas	✔
10	Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	✔



Category	Title	Cer
11	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	
12	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	
13	State of Good Repair Grants	
14	Infrastructure Finance Programs	
15	Alcohol and Controlled Substances Testing	
16	Rail Safety Training and Oversight	
17	Demand Responsive Service	
18	Interest and Financing Costs	
19	Construction Hiring Preferences	
20	Cybersecurity Certification for Rail Rolling Stock and Operations	
21	Tribal Transit Programs	

1 - 21 of 21

## Documents

### Existing Documents

Document	Description	Uploaded By	Date
No items available			

## Affirmation of Applicant

**Affirmation of Applicant** BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2021, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2021.

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

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

**Official's Name** Serena Wright

I accept the above

**Certification Date** Feb 24, 2021

## Affirmation of Attorney

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

made and constitute legal and binding obligations on it.

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

**Attorney's Name** Heather Baker

I accept the above

**Certification Date** Feb 24, 2021

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CANCEL

## **APPENDIX B:**

# **CULVER CITYBUS TITLE VI COMPLAINT INVESTIGATION PROCEDURES**

# **Culver CityBus**

## **Title VI Complaint Process**

Culver CityBus grants all citizens equal access to all its transportation services. It is further the intent of Culver CityBus that all citizens are aware of their rights to such access. This site is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of Culver CityBus programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

### **What is Title VI**

Title VI is a section of the Civil Rights Act of 1964 requiring that "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

### **Who are Limited English Proficient Persons?**

Persons who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Different treatment based on a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

### **How do I file a complaint?**

If you believe that you have received discriminatory treatment by Culver CityBus on the basis of your race, color or national origin, you have the right to file a complaint with the Culver CityBus Title VI Coordinator (Senior Management Analyst). The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident.

### **Methods of Filing a Complaint**

The preferred method is to file your complaint in writing using the Title VI Complaint Form, and sending it to:

## **Title VI Coordinator**

Culver CityBus  
4343 Duquesne Avenue  
Culver City, California 90232

Verbal complaints will be accepted and transcribed by the Title VI Coordinator. To make a verbal complaint, call (310) 253-6500 and ask for the Title VI Coordinator. Complaints may also be filed with external entities such as the Equal Employment Opportunity Commission (EEOC); Federal Transit Administration (FTA); or Department of Fair Employment and Housing (DFEH). Please review information on the respective agency websites for details on filing Title VI complaints.

Should a complaint be filed with Culver CityBus and an external entity simultaneously, the external complaint shall supersede the Culver CityBus complaint and the Culver CityBus complaint procedures will be suspended pending the external entity's findings.

## **Investigations**

Within 10 working days of receipt of the formal complaint, the Title VI Coordinator will notify the complainant and begin an investigation (unless the complaint is filed with an external entity first or simultaneously).

The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

The investigation will be conducted and completed within 90 days of the receipt of the formal complaint.

Based upon all the information received, an investigation report will be written by the Title VI Coordinator for submittal to the Chief Transportation Officer.

The complainant will receive a letter stating that final decision by the end of the 90-day time limit.

The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the Federal Transit Administration (FTA).

If the complainant is dissatisfied with the determination and/or resolution set forth by Culver CityBus, the same complaint may be submitted to the FTA for

investigation. The complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 201 Mission Street Suite 1650 San Francisco, CA 94105-1839.

A copy of the complaint and Culver CityBus' investigation report/letter of finding and final remedial action plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.

A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

### Title VI Complaint Form

<b>Section I</b>		
Name:	Telephone (Work):	
Address:		
Telephone (Home):	E-mail Address:	
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II</b>		
Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes* <input type="checkbox"/> No		
*If you answered "yes" to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Section III</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
Date of Alleged Discrimination (Month, Day, Year):		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witness. If more space is needed, please use the back of this form.		
<b>Section IV</b>		
Have you previously filed a Title VI complaint with this agency? <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Section V</b>		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency	<input type="checkbox"/> State Agency	<input type="checkbox"/> Local Agency
<input type="checkbox"/> Federal Court	<input type="checkbox"/> State Court	
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone:	
Address:		
<b>Section VI</b>		
Name of agency complaint is against:		
Contact person:	Title:	
Telephone:		
You may attach any written materials or other information that you think is relevant to your complaint. Signature and date required below		
Signature _____		Date _____
Please submit this form in person at the address below, or mail this form to: Culver CityBus, Attn: Title VI Coordinator, 4343 Duquesne Avenue, Culver City, CA 90232		

## Título VI Formulario de Reclamación

<b>Sección I</b>	
Nombre:	Teléfono (trabajo):
Dirección:	
Teléfono (casa):	Dirección de correo electrónico:
¿Requisitos de formato accesible?	<input type="checkbox"/> Impresión grande <input type="checkbox"/> Cinta de audio <input type="checkbox"/> Teléfono de texto <input type="checkbox"/> Otro
<b>Sección II</b>	
¿Presenta usted esta queja en su nombre propio?	<input type="checkbox"/> Sí * <input type="checkbox"/> No <small>* Si usted contestó "sí" a esta pregunta, vaya a la sección III.</small>
Si no, indique el nombre y la relación que tiene con la persona por quien presenta la queja :	
Por favor explique por qué presenta la queja a nombre de un tercero:	
Por favor confirme que ha obtenido el permiso de la parte agraviada.	<input type="checkbox"/> Sí <input type="checkbox"/> No
<b>Sección III</b>	
Creo que la discriminación de que fui objeto fue por (Marque los que apliquen):	
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Nacionalidad	
Fecha de la presunta discriminación (mes, día, año):	
Explique de la manera más clara posible lo que sucedió y por qué cree que se le discrimino. Describa todas las personas involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que discrimino/discriminaron en contra suya (si se conoce) así como los de cualquier testigo. Si necesita más espacio, por favor use la parte de atrás de este formulario.	
<b>Sección IV</b>	
¿Usted ha presentado una demanda de Título VI ante esta agencia anteriormente?	<input type="checkbox"/> Sí <input type="checkbox"/> No
<b>Sección V</b>	
¿Usted ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?	<input type="checkbox"/> Sí <input type="checkbox"/> No
Si usted contesta "sí", marque los que apliquen:	<input type="checkbox"/> agencia federal <input type="checkbox"/> agencia estatal <input type="checkbox"/> tribunal federal <input type="checkbox"/> tribunal estatal <input type="checkbox"/> agencia local
Por favor entre la información de la persona de contacto en la agencia/el tribunal donde se presentó la queja	
Nombre:	Título:
Agencia:	Teléfono:
Dirección:	
<b>Sección VI</b>	
Nombre de la agencia en que la denuncia es contra:	
Persona de contacto:	Título:
Teléfono:	
Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante a su queja.	
Firma y fecha requerida a continuación	
_____	_____
Firma	Fecha
Por favor someta este forma en persona a la siguiente dirección, o envíe por correo este formulario a: Culver CityBus, Attn: Coordinador del Título VI, 4343 Duquesne Avenue, Culver City, CA 90232	



## **APPENDIX C:**

# **ASSESSMENT OF SERVICE AND FARE CHANGES ON MINORITY AND LOW INCOME POPULATIONS**

## **Assessment of Impacts on Minority and Low-Income Riders of Future Fare and Major Service Changes**

Title VI requires transit agencies with more than 50 peak hour service vehicles to conduct an equity analysis when considering major service and fare changes. While Culver CityBus does not meet the minimum size standard, its commitment to social and environmental justice is supported by the following methodologies

### **Fare Change**

When considering any fare increase, Culver CityBus will engage its public notification process in both English and Spanish. Notices of the proposed fare changes and dates for public comments will be posted on all buses, sent to customer email distributions on social media and the Culver CityBus website. Public notices will encourage input, including comments from persons with limited English proficiency and those who may consider the proposed fare an excessive economic impact. To assist low-income riders, the agency provides information and promotes the availability of subsidy programs for low-income riders, such as the Low Income Fare is Easy (LIFE) regional program, to help minimize the impacts of the fare change.

### **Service Change**

Any service change that affects 25% of an individual route, in terms of route length, service hours or service miles or 25% of the system's mileage, overall, will be considered a major service change. Notices of proposed major service changes and dates for public comments will be posted on all buses, sent to customer email distributions on social media and the Culver CityBus website. An analysis of disparate impacts on low income households will be performed by examining where proposed changes to route alignments and service frequencies impact low income areas at the census tract level. Additionally, Culver CityBus will consider public comments on social and economic issues related to proposed service changes as part of the decision making process.

## **APPENDIX D:**

# **LIMITED ENGLISH PROFICIENCY ASSESSMENT AND IMPLEMENTATION PLAN FOR CULVER CITY TRANSPORTATION DEPARTMENT**

# **LIMITED ENGLISH PROFICIENCY ASSESSMENT AND IMPLEMENTATION PLAN CULVER CITY TRANSPORTATION**

## **Introduction**

This Limited English Proficiency (LEP) Assessment and Implementation Plan has been prepared to address Culver City Transportation's (Culver CityBus) responsibilities as a recipient of federal financial assistance to provide meaningful access to limited-English proficient persons. While consistent with Title VI requirements for non-discrimination on the basis of race, color, or national origin, obligations to LEP compliance are enacted by Executive Order 13166, which requires Federal agencies to provide guidance to recipients of federal financial assistance on ways to provide meaningful access to LEP individuals. The Department of Transportation (DOT) guidance is provided through 70 FR 74090, *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons*, which frames the criteria used by DOT in evaluating compliance with Title VI regulations.

Limited English proficient (LEP) persons are individuals for whom English is not their primary language and who have limited ability to read, write, speak or understand English. Within the Culver CityBus service area, 40% of the population speaks at least one other language other than English. Slightly less than 12% of the service area population meets the definition of an LEP person.

## **Assessment of Limited English Proficient Population**

In order to determine the extent of its obligation to provide LEP services, Culver CityBus assessed the LEP environment using the U.S. Department of Transportation's four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Culver CityBus program, activity or service.
2. The frequency with which LEP persons come in contact with Culver CityBus programs, activities or services.
3. The nature and importance of programs, activities or services provided by Culver CityBus to the LEP population.
4. The resources available to Culver CityBus and overall cost to provide LEP assistance.

The assessment examined census tract-level information derived from the 2021 American Community Survey for Language Spoken at Home for Population 5 Years and Older. Based on this data, the following summary of the four-factor analysis is presented in the following section.

### **Four-Factor Analysis**

#### **1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Culver CityBus program, activity or service.**

Census tracts that are within 3/4 mile of a Culver CityBus route comprise the Culver CityBus service area. Figure A.2 shows the areas where the LEP populations reside in relation to transit service within this radius.

Data derived from the U.S. Census 2021 American Community Survey (ACS) shows the total service area has a population of 438,809 that are five years of age or older. Of those persons, 50,025 (11.4%) speak English "less than very well" Fifty - six percent of the LEP population (28,017) speak Spanish as their primary language. A chart showing a breakdown of all LEP languages spoken at home is presented in Table A.1.

The category, "Other Indo European" populations comprised approximately 7,100 persons or 1.6% of the service area population. These LEP languages include Armenian, Persian, Gujaratis, Hindi, Urdu and Other Indic.

Mandarin and Cantonese are spoken as first languages by over 4,400 persons (1.0%) within the service area. "Other Asian and Pacific Islander" languages are spoken as the primary language for 3,357 (0.8%) persons. This category includes Japanese, Khmer/Cambodian, Miao/Hmong, Laotian and Thai languages in the 2021 ACS. Approximately 28.4% of the service area's Korean population (1,484) speak English "less than very well", which represents 0.3% of the total service area population.

Figure A.2 shows the dispersion of the total LEP population across the Culver CityBus service area. While higher concentrations of LEP residents are reflected on the eastern and southern perimeters of the service boundary, the map shows that Culver CityBus serves a diverse population with limited English proficiency, of which more than one-half speak Spanish. Figures A.3 through A.9 show the distribution of these LEP populations by language category.

The dispersion of LEP populations speaking Spanish is presented in Figure A.3, showing the highest concentrations along the eastern and southern service area perimeter, but

to a lesser degree throughout the service area.

Figure A.4 reflects Other Indo-European populations, which are primarily concentrated in several northern and two southern census tracts in the service area.

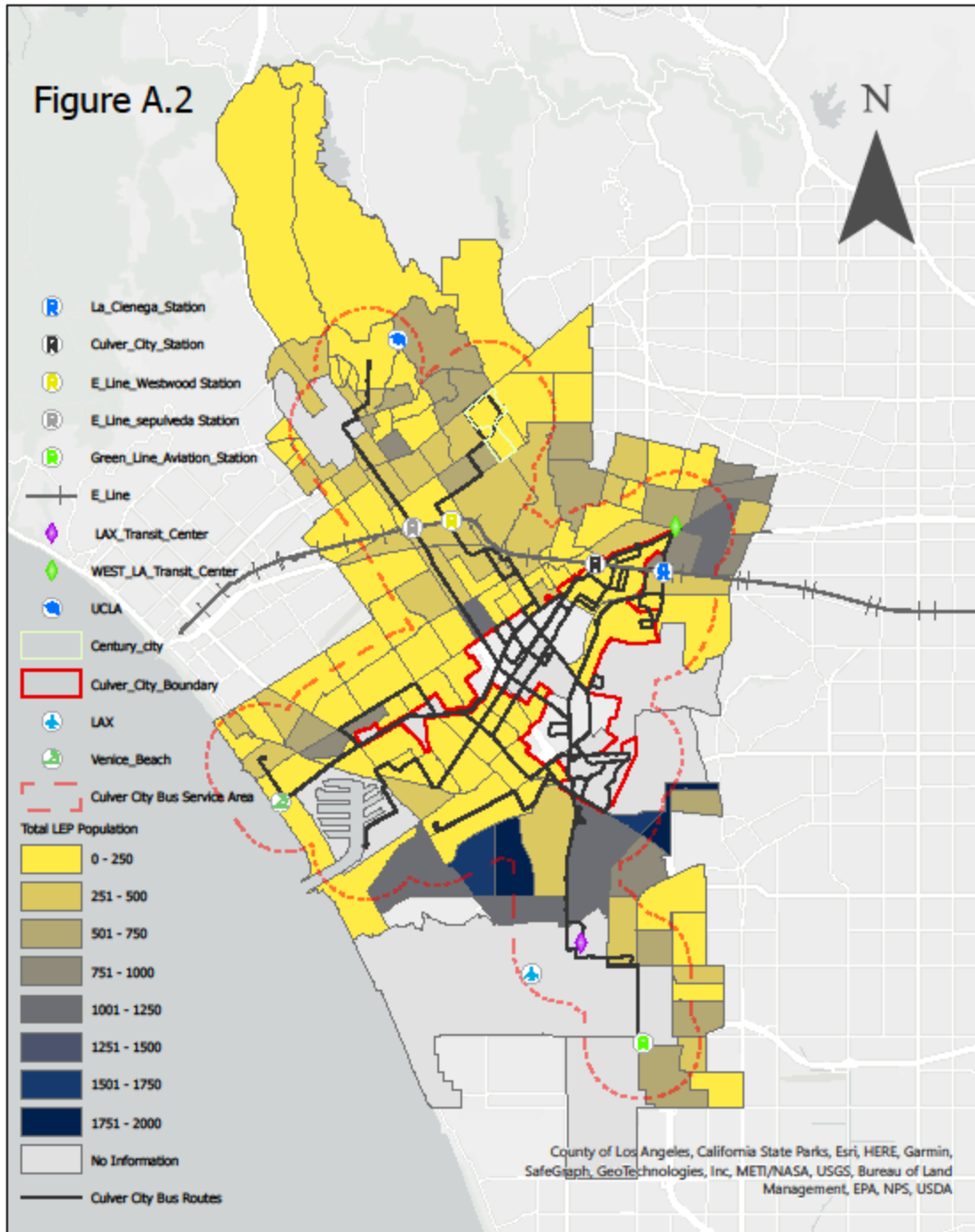
Figure A.5 presents LEP populations speaking Chinese, including Mandarin, which indicate concentrations in eastern and northern areas served by Culver CityBus.

Figure A.6 shows LEP populations speaking Other Asian Pacific Islander languages primarily concentrated in census tracts in Culver CityBus's southern service area.

Other language categories that meet the 1000 population minimum criteria for study include LEP populations speaking Korean (1,484); Russian, Polish and Other Slavic languages (1,198); and, Other and Unspecified languages (1,063), which are shown in Figures A.7 – A.9, respectively. These populations are dispersed throughout the service area and do not reflect any specific geographic concentrations, based on the 2021 ACS data.

<b>Table A.1</b>								
<b>Culver City Service Area LEP Speakers</b>								
<b>Department of Justice Safe Harbor Analysis</b>								
	American Community Surevy 2019				American Community Surevy 2021			
Total Population 5 Years and Older	485,938				438,809			
Language Group	Total in Group	Percent of Total Population	Speak English "less than very well" Group		Total in Group	Percent of Total Population	Speak English "less than very well" Group	
		Percent	Number	Percent		Percent	Number	Percent
<b>English</b>	291,452	60.0%			260,951	59.5%		
<b>Spanish</b>	98,154	20.2%	31,056	6.4%	92,223	21.0%	28,017	6.4%
<b>Indo European</b>								
French/ Haitian/ or Cajun	6,783	1.4%	1,038	0.2%	5,748	1.3%	910	0.2%
French/ Creole								
Italian								
Portuguese								
German/ other West Germanic	3,267	0.7%	274	0.1%	3,108	0.7%	143	0.0%
Yiddish								
West Germanic								
Scandanavian								
Greek								
Russian/ Polish/ Other Slavic	5,593	1.2%	1,476	0.3%	5,282	1.2%	1,198	0.3%
Armenian								
Persian								
Gujarathi								
Hindi								
Urdu								
Other Indic								
Other Indo European	30,388	6.3%	8,096	1.7%	26,159	6.0%	7,119	1.6%
<b>Asian/ Pacific Islander</b>								
Mandarin/ Cantonese	15,410	3.2%	5,207	1.1%	13,719	3.1%	4,405	1.0%
Cantonese								
Japanese								
Korean	6,506	1.3%	2,140	0.4%	5,219	1.2%	1,484	0.3%
Khmer, Cambodian								
Miao Hmong								
Thai								
Laotian								
Vietnamese	2,138	0.4%	530	0.1%	2,292	0.5%	656	0.1%
Tagalog	4,854	1.0%	999	0.2%	4,559	1.0%	988	0.2%
Other Asian and Pacific Islander	11,813	2.4%	3,898	0.8%	9,804	2.2%	3,357	0.8%
<b>All Other Languages</b>								
Navajo								
Other Native American								
Hungarian								
Arabic	3,176	0.7%	970	0.2%	3,207	0.7%	685	0.2%
Hebrew								
African								
Other Unspecified	6,404	1.3%	1,011	0.2%	6,538	1.5%	1,063	0.2%
<b>Total</b>	485,938	100.0%	56,695	11.7%	438,809	100.0%	50,025	11.4%

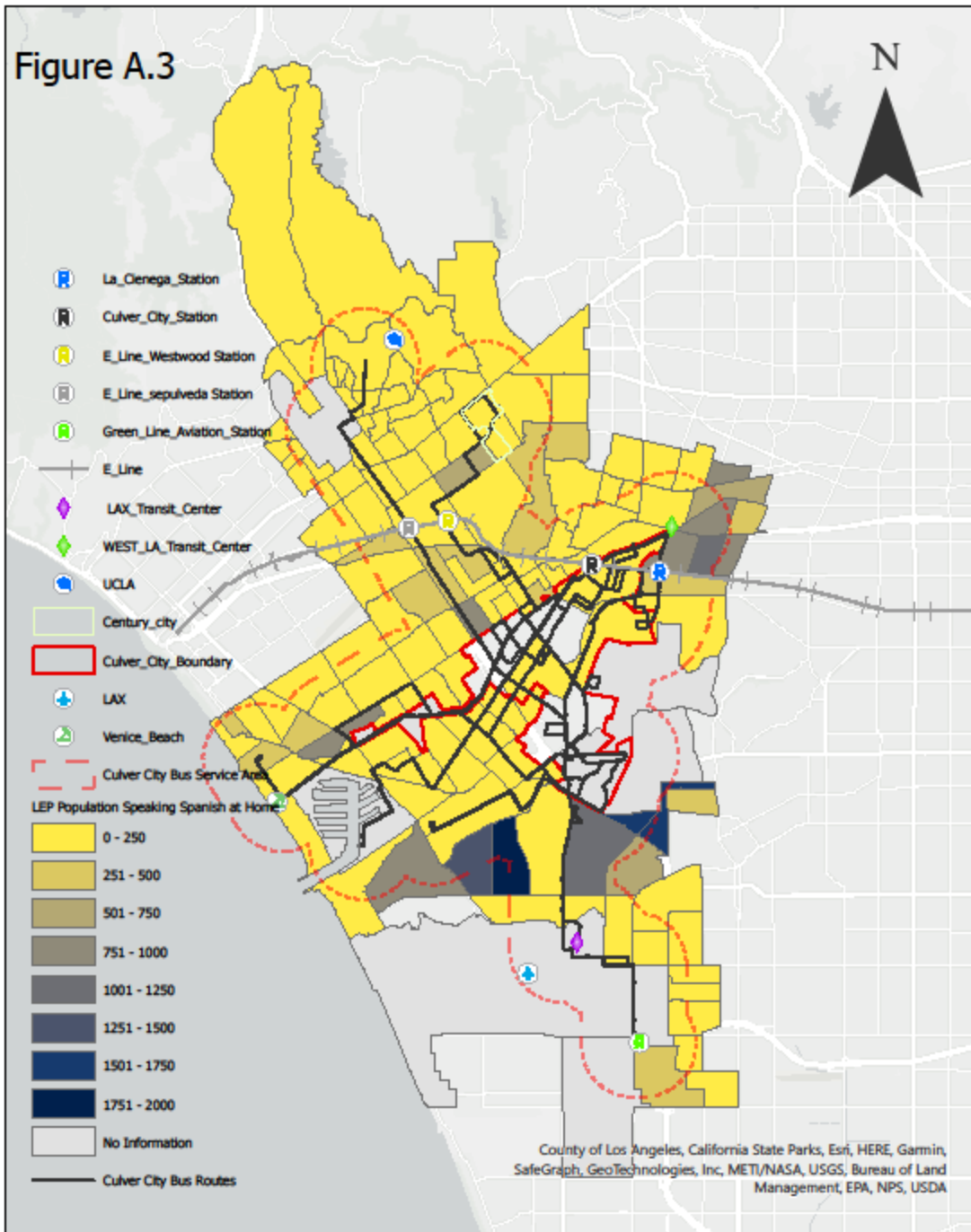
## TOTAL LEP POPULATION IN CENSUS TRACTS



Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001

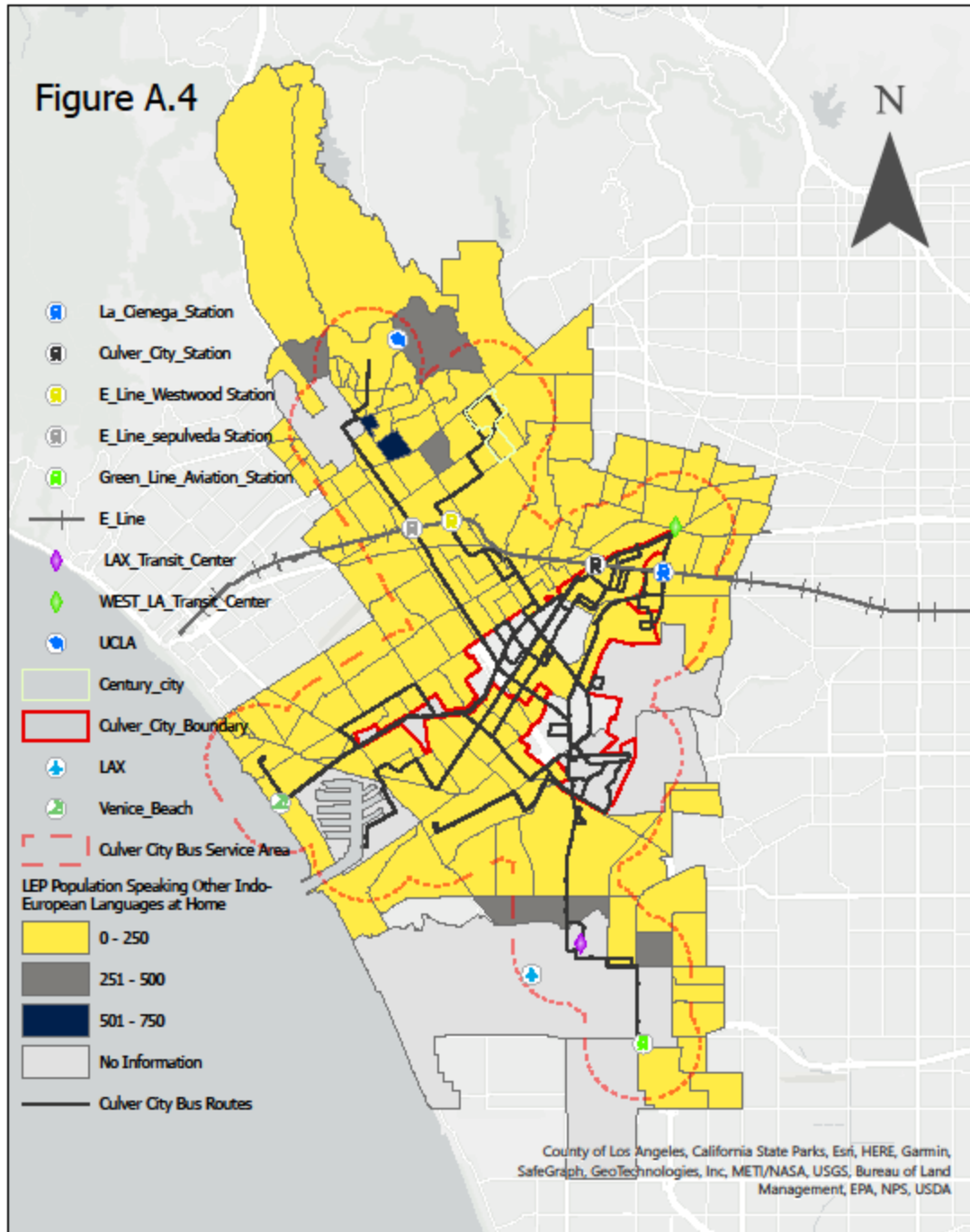


LEP POPULATION SPEAKING SPANISH AT HOME IN CENSUS TRACTS



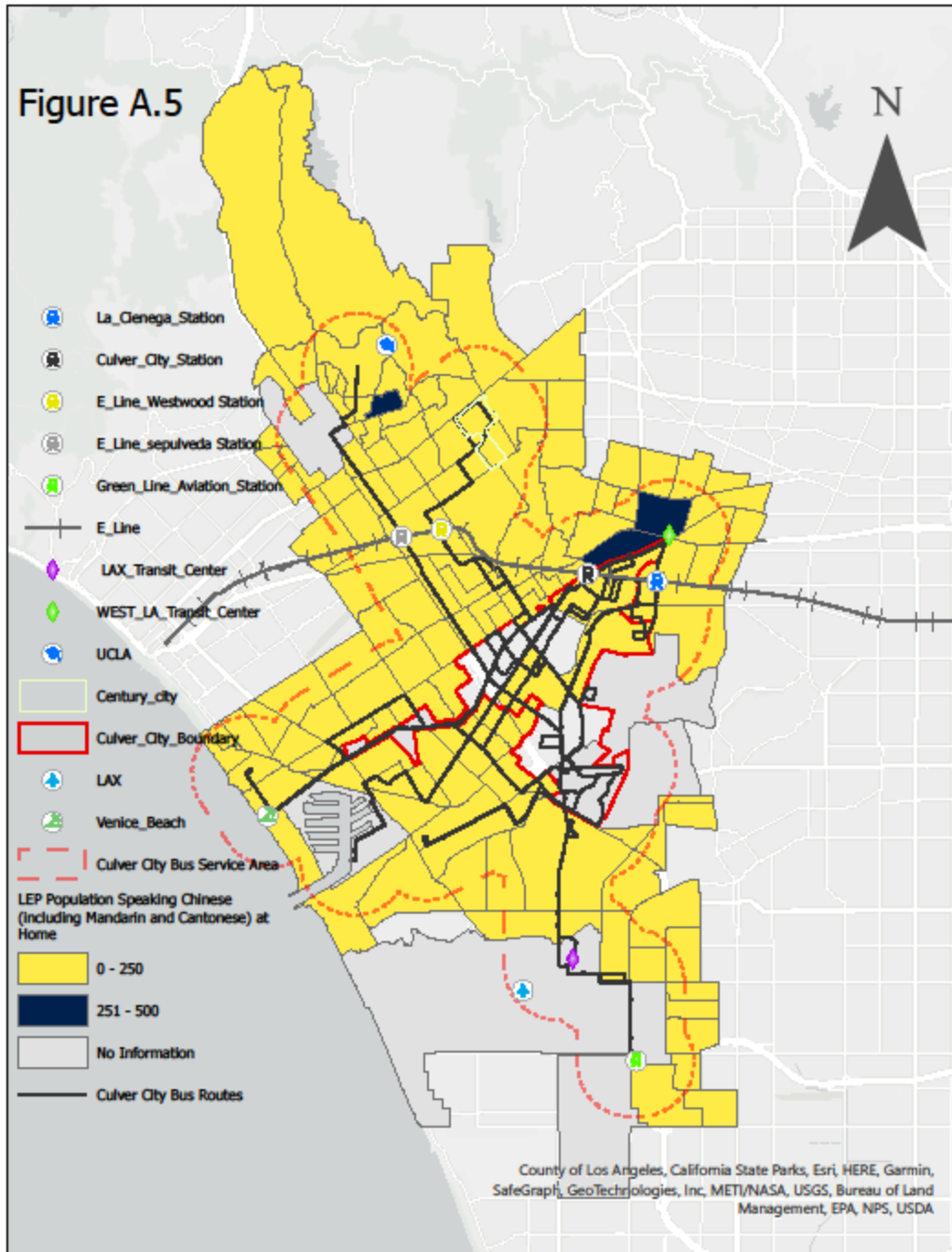
Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001

LEP POPULATION SPEAKING OTHER INDO-EUROPEAN LANGUAGES AT HOME IN CENSUS TRACTS



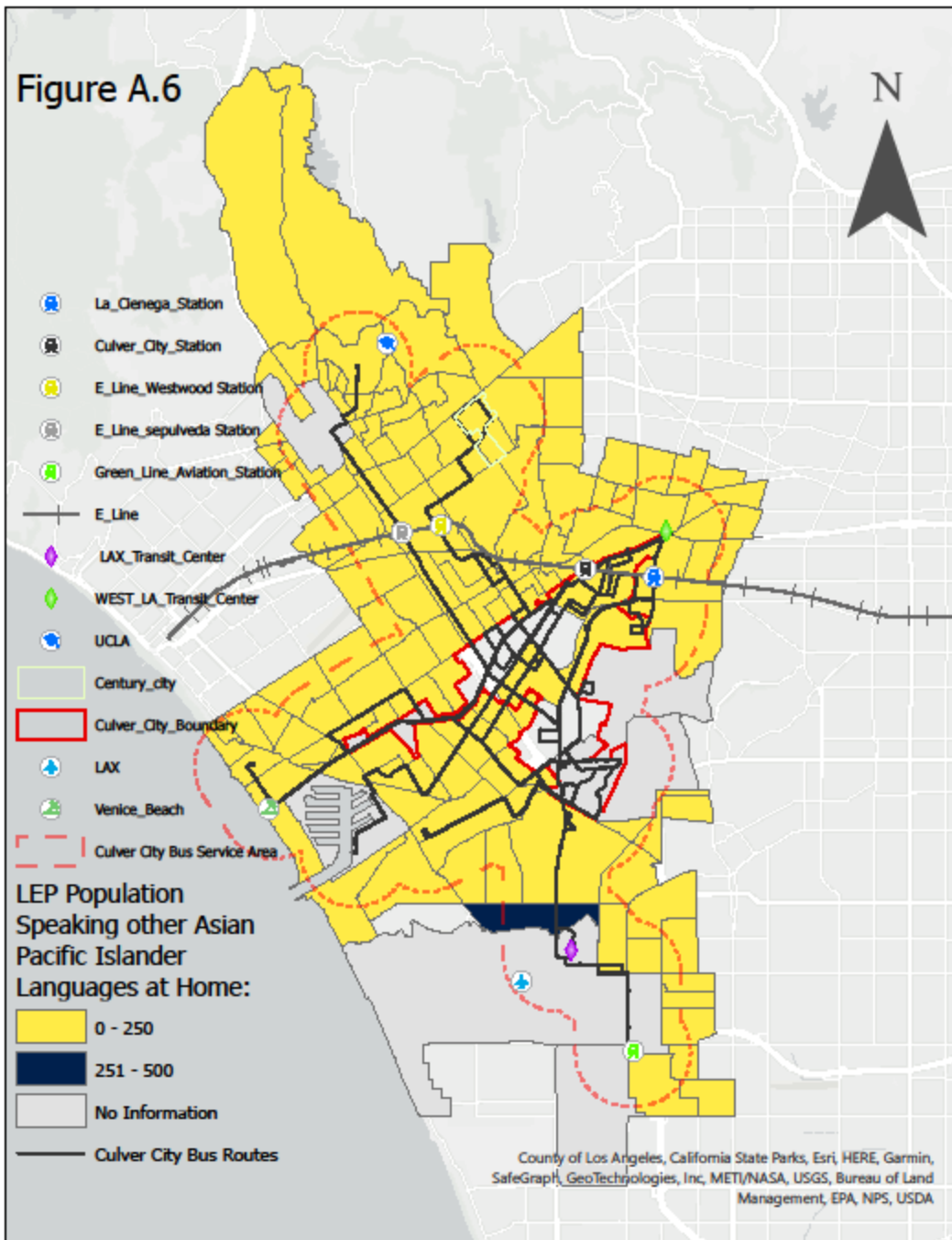
Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001

**LEP POPULATION SPEAKING CHINESE INCLUDING MANDARIN, CANTONESE AT HOME IN CENSUS TRACTS**



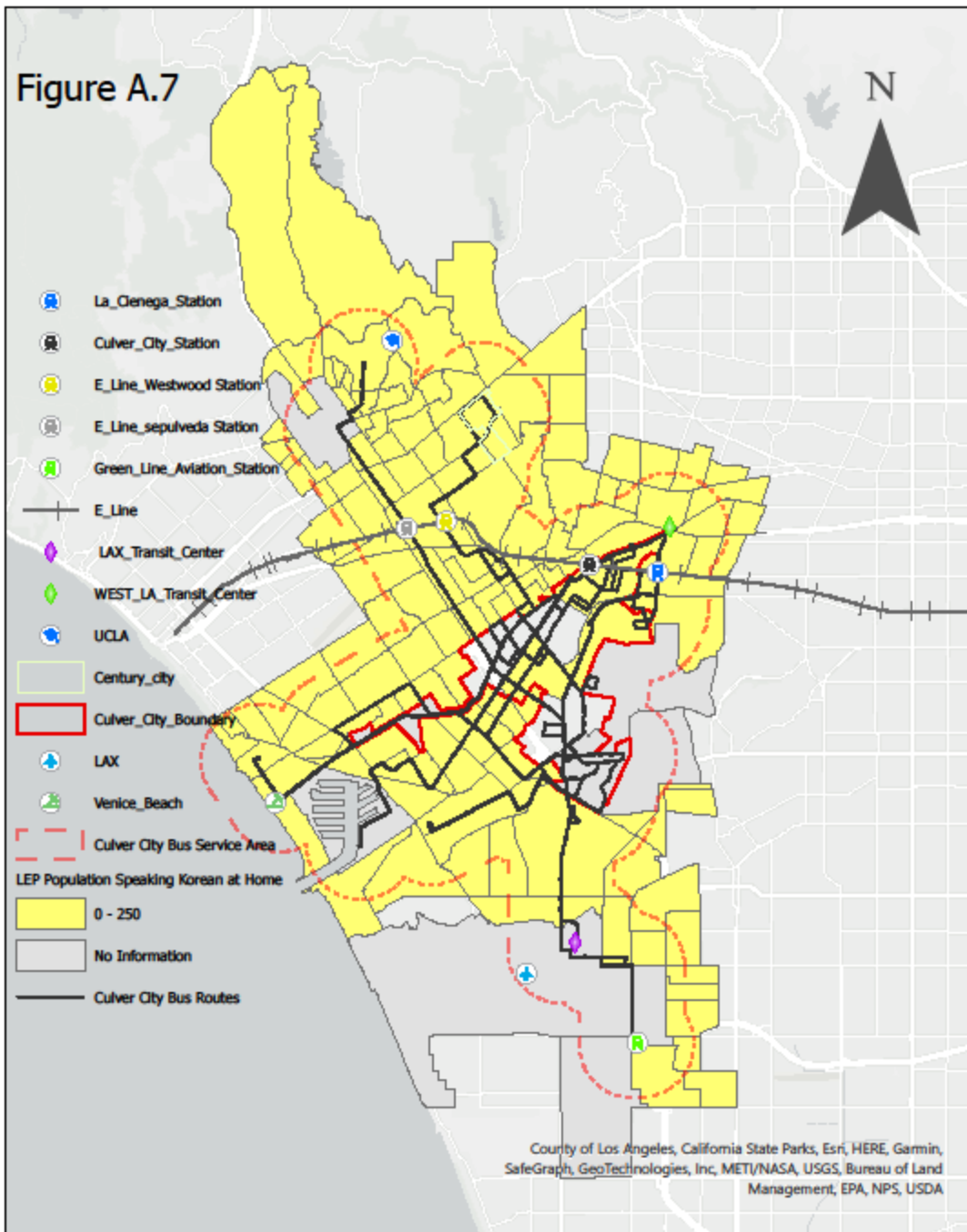
Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001

**LEP POPULATION SPEAKING OTHER ASIAN  
PACIFIC ISLANDER LANGUAGE AT HOME IN CENSUS TRACTS**



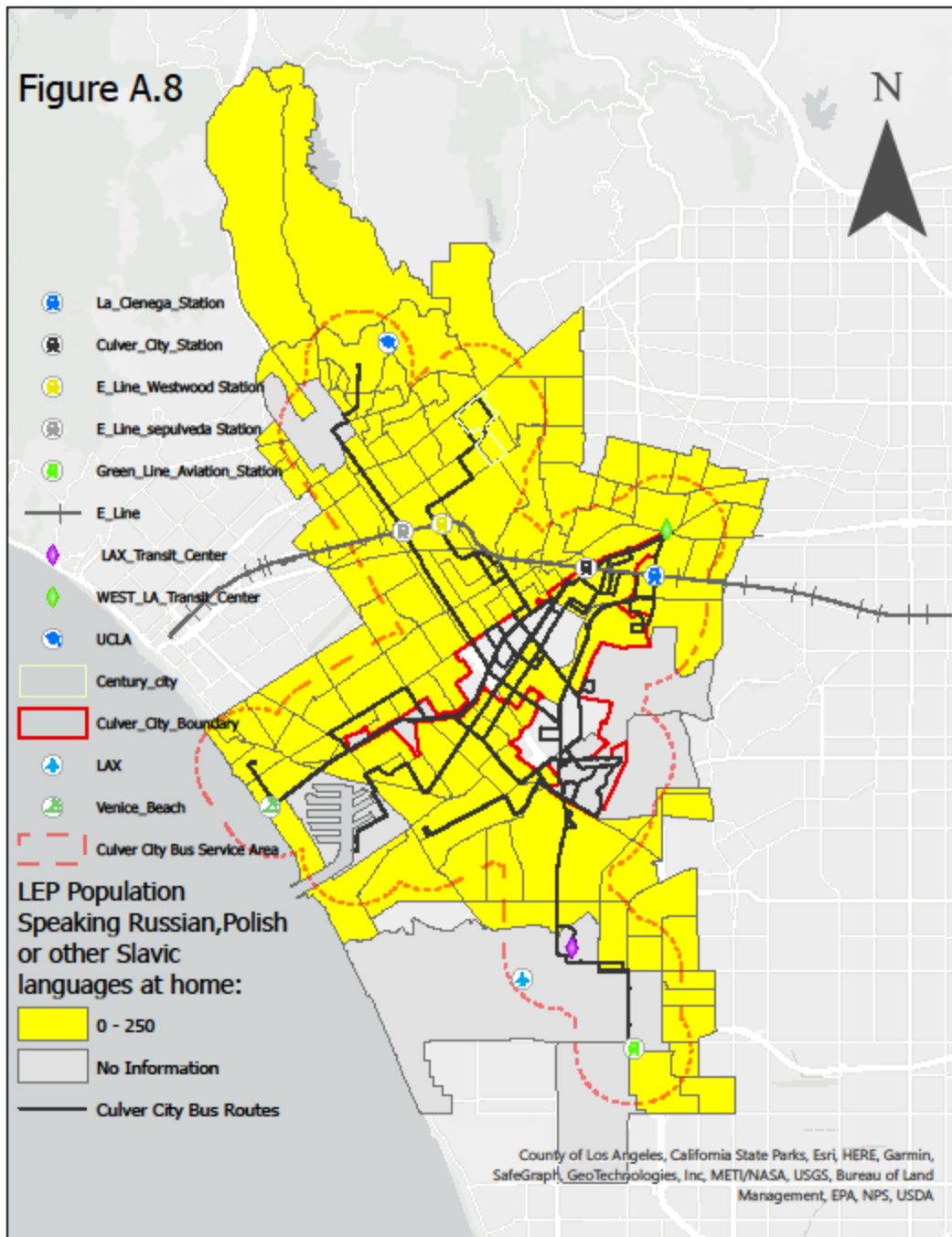
Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001

**LEP POPULATION SPEAKING KOREAN AT HOME  
IN CENSUS TRACTS**



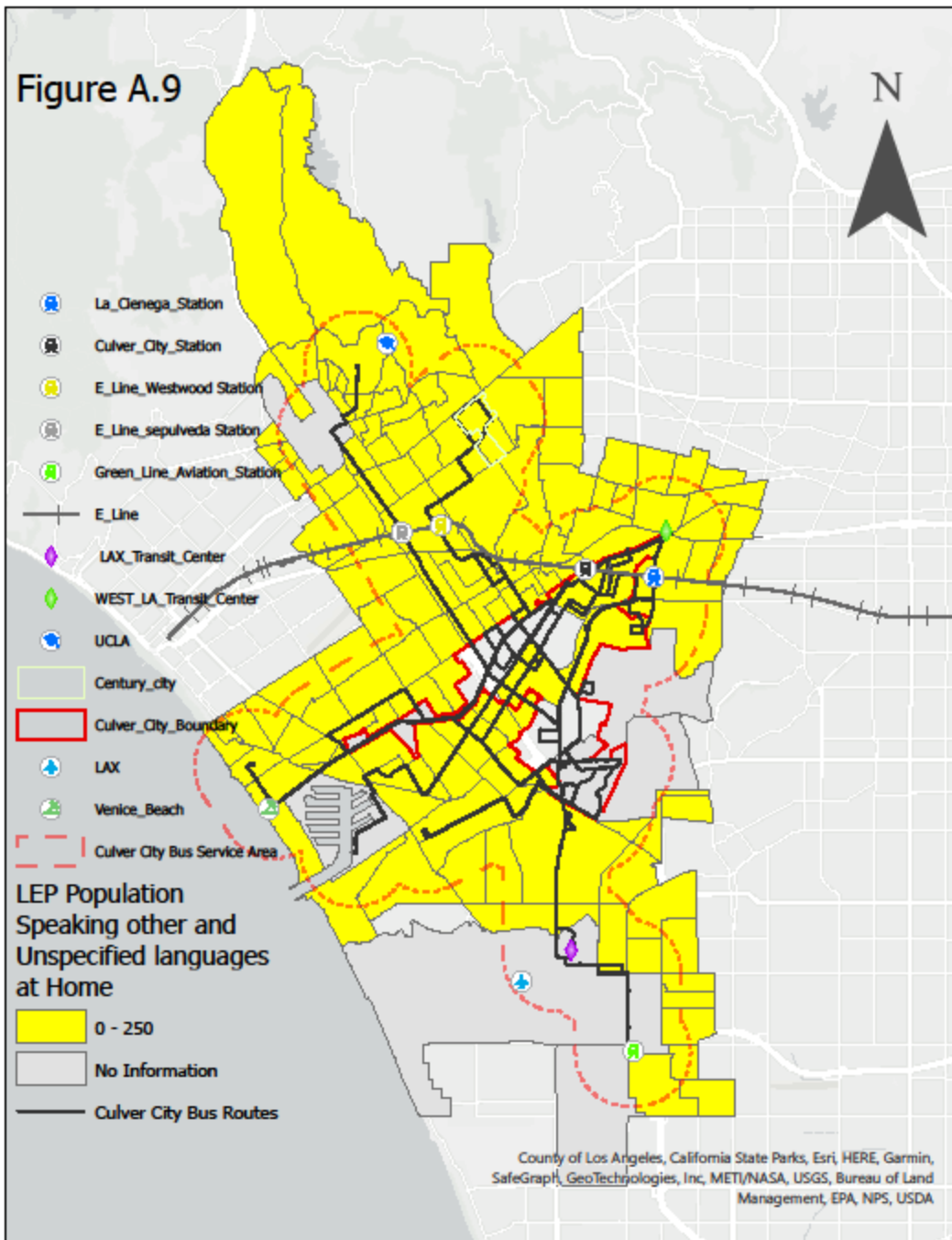
**Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001**

**LEP POPULATION SPEAKING RUSSIAN, POLISH OR OTHER SLAVIC LANGUAGES AT HOME IN CENSUS TRACTS**



Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001

**LEP POPULATION SPEAKING OTHER AND UNSPECIFIED  
LANGUAGES IN CENSUS TRACTS**



Source: U.S. Census Bureau, 2021 5-year Community Survey, Table ID: C16001

## **2. The frequency with which LEP persons come in contact with Culver CityBus programs, activities or services.**

Culver CityBus routinely monitors the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes reviewing phone inquiries and surveying bus operators. In addition to serving a diverse residential population, Culver CityBus services Los Angeles International Airport which connects international visitors to local transit service at the LAX Transit Center. Culver CityBus serves major tourism attractions, such as Venice Beach and provides connections to other major educational, commercial and tourist destinations across Los Angeles County via direct service to destinations within the area's vibrant westside communities and connections to the regional Metro light rail network.

Since the onset of the COVID -19, the transit system has deferred all external surveying activities; however, the most recent survey taken found that 34% bus operators have daily interaction with limited English-speaking passengers. The predominant language encountered by bus operators is Spanish, with bus operators reporting some interaction with passengers speaking other languages including Korean, Japanese and Chinese dialects. While all public notices placed on transit vehicles are published in both English and Spanish, 90% of motor coach operators had not received requests for translated materials in other languages.

## **3. The nature and importance of programs, activities or services provided by Culver CityBus to the LEP population.**

Public transportation is an essential service which Culver CityBus provides without regard to race, color, or national origin. Staff training provided to all personnel who come into contact with the public clearly indicates that every effort is to be made to ensure that a passenger's rights to access the service are protected and that service is not to be denied based on a customer's inability to speak English well.

When plans and programs to improve public transportation services are being developed, the opportunity for persons with limited English proficiency to provide input and fully engage in the planning process is also important.

## **4. The resources available to Culver CityBus and overall cost to provide LEP assistance.**

Culver CityBus operates fewer than 50 vehicles, yet its commitment to social and environmental equity is demonstrated in its voluntary inclusion of Title VI components required of transit providers that operate larger transit systems,



including:

- A demographic analysis and map of the transit provider's service area,
- A description of the public engagement process for setting "major service change policy."

Although there is not financial capacity to incorporate written translations for every language spoken within the diverse LEP community, a language assistance implementation plan has been developed that commits resources needed to support full access to services, plans and programs to LEP persons.

### **Language Assistance Implementation Plan**

Culver CityBus will make every effort to provide oral interpretation, written translation and other language assistance services to LEP individuals. The foundation of this support will be provided through:

- Identification and training of in-house, multi-lingual staff
- Voluntary translators available through community-based social and cultural organizations throughout the service area, and
- Commercial translation, electronic and telephonic interpretation/translation services.
- Continued analysis of the frequency with which LEP individuals come in contact with Culver CityBus services and programs.
- Posting the availability of language assistance services at meetings, online and in telephone messaging systems for incoming customer service calls.
- Provide Census Bureau Language Identification Flashcards ("I Speak Cards") to bus operators, customer service staff and at registration tables set up for Culver CityBus public meetings and events.
- Network with local community service centers, such as the Culver City Senior Center, which provide services to LEP individuals and seek opportunities to provide information on transit services.
- Vehicle operators and other front-line staff, including bus operators, supervisors, customer service representatives, clerical staff and dispatchers will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- Monitor LEP participation as part of the Culver CityBus Consolidated Service Analysis that will be conducted in FY 2023 to foster LEP participation in the planning process and to incorporate survey tools that will allow the process to produce relevant information on LEP customer accessibility to mobility programs and services.

- Incorporate the use of computerized translation tools on the Culver CityBus website.
- Provide written translation of any Culver CityBus policy, upon request of an LEP person.

### **Safe Harbor Stipulation**

The Department of Transportation has adopted the Department of Justice's Safe Harbor provision that presumes strong evidence of compliance with a recipient's written translation obligations under Title VI if written translation of vital documents is provided for each LEP group that constitutes five percent (5%) of the total service area population or 1,000 persons, whichever is less.

In the Culver CityBus service area, only Spanish speakers with limited English proficiency exceed 5% of the total population. A number of language groups exceed the 1,000 person threshold for which written translations of vital documents could be provided under the safe harbor standard. The language groups that exceed 1,000 persons include: Other Indo-European Languages (7,119); Mandarin/ Cantonese (4,405); Other Asian and Pacific Islander Languages (3,357); Korean (1,484); Russian/Polish/ Slavic Languages (1,198); and Other Unspecified Languages (1,063). Table A.1 shows the LEP population analyzed pursuant to this provision.

The inability to provide written translations of all transit policies for each language group that meets the safe harbor criteria does not mean there is noncompliance. However, this analysis will serve as a guide to better understanding the need for interpretation/ translation services within the Culver CityBus service area.

While Culver CityBus will continue to translate vital documents such as the Title VI Complaint Forms, the Title VI reporting process, the LEP Plan and public notices of changes to transit service into the Spanish, it will monitor and evaluate the need for future translation of materials into the other languages listed above. Culver CityBus staff will utilize features such as *Google Translate* and multilingual staff from the City of Culver City to translate vital documents for eligible LEP language groups upon request. Culver CityBus will also proceed with oral interpretation options for compliance with LEP regulations.

### **Dissemination of the Culver CityBus LEP Plan**

The following training information will be distributed to Culver CityBus staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.

- Use of the *Language Identification Flashcards*.
- Information on how to document language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- Bus operator training incorporating FTA's Title VI training video.
- Information on how City personnel may qualify to become a paid language assistance translator.

Members of the public will be able to access the Title VI Update report and LEP Plan from the City of Culver City website where both documents will be available in a downloadable .PDF format. Copies may also be obtained upon request via telephone, fax, mail, or in person, and shall be provided at no cost. LEP individuals may request copies of the plan in translation which Culver CityBus will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to:  
Title VI Coordinator  
City of Culver City Transportation  
4343 Duquesne Avenue  
Culver City, CA 90232  
(310) 253-6500.

### **Monitoring and Updating the LEP Plan**

Culver CityBus will continue to monitor, assess and update the LEP Plan as required by the FTA. The next update of this plan will be completed by April 1 2026.