

Culver City Municipal Bus Lines
Title VI Report
&
Limited English Proficiency (LEP) Plan
2017 Information Update



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**DIVERSIFIED
TRANSPORTATION
SOLUTIONS**

In Association With:

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I. OVERVIEW

A. Purpose

The Federal Transit Administration (FTA), managed by the U.S. Department of Transportation, requires that federally funded transit agencies submit a triennial report to ensure compliance with Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, national origin or income during the provision of transit services by recipients of Federal financial assistance. To demonstrate compliance with these provisions, Culver CityBus is submitting this report in accordance with FTA Circular 4702.1B issued October 1, 2012. Culver CityBus is committed to upholding the intent and obligation of Title VI regulations, and to providing meaningful language assistance to persons who are limited in English proficiency.

B. Background of the Service Area

The City of Culver City was incorporated in 1917 and the U.S. Census Bureau estimates the 2016 population at 40,448,¹ while the median age of residents is 42.5² years, and the median household income is \$78,443.³ Culver City represents 0.4% of Los Angeles County's total population.⁴ Culver City covers a five square mile area and is situated on the west side of metropolitan Los Angeles between Santa Monica to the northwest, Westchester and Inglewood to the south, Los Angeles to the north and east, with Venice and Marina Del Rey to the west.

Culver City Municipal Bus Lines (aka Culver CityBus) was established in 1928 with one passenger line along Washington Boulevard, from Culver City to Venice Beach. Over the past 90 years, Culver CityBus has expanded to serve several local communities that include: Culver City and Los Angeles (West Los Angeles, Westwood, Venice, Marina Del Rey, Mar Vista, Palms, Rancho Park, Westchester, and Century City). Culver CityBus serves several large local employment centers in Culver City and near Los Angeles International Airport (LAX), West Los Angeles, and UCLA while supplying linkages to transit services and regional employment hubs through Metro's Expo and Green Lines.

The Culver CityBus total service area encompasses 33 square miles with a population of about 344,701 people.⁵ The breakdown of the population in terms of race for the Culver CityBus service area can be found on the following page in Table 1.

¹ SCAG 2017, Profile of Culver City

² Ibid

³ Ibid

⁴ Ibid

⁵ U.S. Census Bureau, 2015. American Community Survey

Culver CityBus Service Area 2017 Census Tracts: Race and Ethnicity				
White	Hispanic or Latino	African Am	Asian	Am Indian and Alaska Native
48%	23%	9%	16%	0%
Native Hawaiian and Other Pacific Islander	Other Race	Two or More Races	Total Minority	Total Non-Minority
0%	1%	4%	52%	48%
Source: U.S. 2015 Census: American Community Survey				

Table 1: Culver City Municipal Bus Lines Service Area Community Ethnicities

C. Culver CityBus Service Provision

Fixed-route Revenue Service

Culver CityBus has operated weekday service continuously since 1928 in response to a disagreement over passenger fares between the city and the Pacific Electric Railway that operated trolley car service from Los Angeles to Venice at the time. Since its inception, Culver CityBus, as one of the oldest municipal bus lines in the state, has provided consistently reliable and user-friendly public transportation services in the area.

Culver CityBus provides transportation to area residents with fixed bus routes that service many local communities and provide access to Metro Rail, West Los Angeles, and nearby coastal communities.

As of May 2017, the Department's total fleet is comprised of 53 New Flyer 40-foot low-floor compressed natural gas (CNG) buses and one (1) 30-foot low-floor CNG bus.⁶ Culver CityBus coordinates its service schedules with surrounding transit providers like 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. Culver CityBus operates 43 peak hour buses and provides public transportation for 5.6 million unlinked passenger trips annually.⁷ Culver CityBus accrues about 20.6 million annual passenger miles and 1.7 million annual vehicle revenue miles.⁸ Table 2 provides the peak frequencies of service by day for all Culver CityBus routes.

⁶ Culver CityBus Vehicle Listing, May 4, 2017

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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 HS	60		
3	Crosstown: Mesmer/Centinela to Century City	20-25	30	30
4	Jefferson Blvd: West Los Angeles Transit Center to Westfield Culver City Transit Center	35-40	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
6 Rapid	Sepulveda Blvd: UCLA to Metro Green Line	30 (Midday peak only)		
7	Culver Blvd: Robertson/Venice to Fisherman's Villiage	40-45		
Source: Culver City Bus Schedules (2017)				

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 thru 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 balance of the fare must be paid by the participant.

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

Culver City General Plan: Circulation Plan

To demonstrate its commitment to equitable transit service regardless of race, ethnicity, or income, Culver City reiterated its pledge to improve the city's circulation and subsequent bus service through their 1995 (30-year) General Plan Update - Circulation Plan. The purpose of the Circulation Plan was to plan, design, and improve the transportation infrastructure to meet projected future needs. Any proposed changes to the circulation system promoted the safe and efficient movement of both people and goods through the City. The policies implemented, as part of the plan, have and will continue to develop and maintain the circulation system and enhance the efficiency of all transportation modes, as well as support proposed land use patterns as part of the plan. The resulting congestion control efforts have and will directly affect the efficiency and comfort of local transit service. Any reduction in auto congestion also benefits and improves other modes of transportation and impacts bus transit service directly.

As documented in the Circulation Plan, the local county transportation commission, the Los Angeles County Metropolitan Transportation Commission (Metro), is responsible for monitoring the compliance of local transportation networks to the state Congestion Management Plan (CMP). Culver City was found to be in conformance with the state CMP as stated in the 1995 General Plan Update.

In addition to the CMP, Culver City's General Plan update also included policies and programs that supported transportation and air quality goals included in the Southern California Association of Governments Regional Transportation Plan (RTP) and the South Coast Air Quality Management Plan.

The Circulation Plan also identifies several transportation demand management programs to reduce overall automobile travel in the city. The plan labels and identifies all types of transportation infrastructure that exists in the city such as: local arteries, local streets, feeder streets, transit corridors, bus routes, and bike lanes. All of the planning elements mentioned in the Circulation Plan have and will work together to form a more efficient multi-modal transportation network for the city in subsequent and future years.

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The following are selected General Plan Goals and Policies that affected public transit, bicycle, pedestrian, and local surface auto congestion and are included below:

Goal - Integrate local and regional transportation systems that serve residential and business needs:⁹

- Objective 1: Improved Traffic Flow. Reduce traffic congestion throughout the city.¹⁰
 - Policy 1.A- Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.¹¹
 - Policy 1.E- Improve traffic flow in areas of high traffic volume by assigning high priority to roadway improvements, transit links, and bikeways which serve these areas.¹²
- Objective 2: Public Transit. Expand public transit services and ridership.¹³
 - Policy 2.A- Support with conditions, development of fixed guideway transit in the Transit Corridors.¹⁴
 - Policy 2.B- Support design and operation of public transit systems that ensure the comfort and safety of all transit passengers.¹⁵
 - Policy 2.C- Maintain levels of transit service that are adequate to meet and encourage ridership demand.¹⁶
 - Policy 2.D- Expand Culver CityBus routes and service levels to address new potential markets and levels of demand.¹⁷
 - Policy 2.F- Increase transit service to enhance central Culver City's pedestrian oriented character.¹⁸

⁹ Culver City General Plan, 1995. Circulation Element

¹⁰ Ibid

¹¹ Ibid

¹² Ibid

¹³ Ibid

¹⁴ Ibid

¹⁵ Ibid

¹⁶ Ibid

¹⁷ Ibid

¹⁸ Ibid

- Policy 2.H- Encourage public transit links to sites of high trip generating uses to maximize transit use by patrons and employees.¹⁹
- Policy 2.K- Support Metro funding to enhance feeder service to Metro rail stations.²⁰
- Objective 3: Bikeways. Provide a system of safe and enjoyable bikeways and support facilities.²¹
 - Encourage the inclusion of a bike path within the Exposition Right-of-Way and any future transit corridors with adequate right-of-way to safely support both uses.²²
- Objective 4: Pedestrian Access. Provide convenient and pleasant pedestrian access.²³
 - Policy 4.B- Enhance the user friendliness of pedestrian staging areas at transit links (bus stops and possible future rail stations) throughout the city.²⁴

¹⁹ Ibid

²⁰ Ibid

²¹ Ibid

²² Ibid

²³ Culver City General Plan, 1995. Circulation Element

²⁴ Ibid

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. Please see the example announcement from the Culver CityBus web page below.

The following notice was created and made available to the public on July 30th 2011, was updated in 2014, and again in 2017. It is also available in Spanish, and is posted in both languages in every Culver CityBus, at the service counter of the Transportation Department, in the lobby of City Hall and on the Culver CityBus website under "Culver CityBus – Contact Us – Title VI Non-Discrimination" at the following address:

<http://www.culvercity.org/enjoy/culver-city-bus/contact-us>

"In accordance with Title VI of the 1964 Civil Rights Act, Culver CityBus is committed to ensuring that no person shall be excluded from the equal distribution of its services and amenities on the basis of race, color, national origin, language proficiency, or economic status. If you believe that you have been subjected to discrimination under Title VI, you may call or file a written complaint with Culver CityBus at (310) 253-6500 or at the Culver City Transportation Facility, 4343 Duquesne Avenue, Culver City, CA 90232. For more information about the current Culver CityBus Title VI Program and Language Assistance Plan (LAP) these documents can be found online at www.culvercitybus.com, or by visiting the Culver City Transportation Facility, 4343 Duquesne Avenue, Culver City, CA 90232."

The Culver CityBus Title VI complaint form and procedures are accessible at the above web address and available in hard copy format at the above mentioned Culver CityBus facility location. The form may be submitted either by mail or delivered in person at the following address: Attention Title VI Coordinator, 4343 Duquesne Avenue, Culver City, CA 90232.

B. Culver CityBus Procedures for Investigating and Tracking Title VI Complaints

Please refer to Appendix B for a full copy of the Culver CityBus Title VI complaint forms in English and Spanish, and the Title VI investigation and compliance 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.²⁵

²⁵ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2017.

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.²⁶

E. Signed Assurances

The signed FTA assurances were submitted through the FTA's web-based grants administration system, TrAMS, on February 8, 2017 in compliance with current reporting requirements.²⁷

F. Construction Impact Analysis

Title VI requires a fixed facility (transit centers, operations facility or yard) impact analysis for construction projects to assess any impacts to minority communities. If this information has been prepared as a result of an environmental impact statement, the application recipient, or subrecipient, should reference the relevant information by documenting page numbers and date of submission to FTA.

A Title VI Equity Analysis should also be conducted during the planning stages to assess where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the placement of facilities. The Title VI equity analysis must compare the equity impacts of various site alternatives, and the analysis must occur before the selection of the preferred site.²⁸

Additional environmental justice principles are reflected in the DOT Order on Environmental Justice (DOT Order 5610.2(a)), address Environmental Justice in Minority Populations and Low-Income Populations. The order describes the process the Department and its modal administrations (including FTA) use to incorporate environmental justice principles into programs, policies, and activities.²⁹

As a result of FTA requirements, environmental impact analyses for fixed facilities shall include:

- A Title VI Equity Analysis conducted during planning stages to assess if or how the location will impact minority communities and provides alternatives analysis.
- A project history and background for each construction project or service plan within the document.

²⁶ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2017.

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²⁸ Federal Transit Administration, Title VI Circular FTA C 4702.1B, 2012.

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- A discussion of the potential impacts on minority communities and minority-owned businesses during and after construction.
- A discussion on all potential negative environmental impacts, such as traffic congestion, noise, air or water pollution;
- A list of minority owned businesses and households affected by construction projects;
- A description of other significant impacts on minority communities, such as: increased traffic, reduction in parking availability, etc.; and
- A description of the relocation program and/or other measures adopted by the applicant used to mitigate identified adverse social, economic, or environmental effects of the proposed construction project or service plan all of which should include an environmental justice component.

During the reporting period, Culver CityBus had no projects in this category.

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 jurisdiction 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 and 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 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

As with any public announcements and customer service information Culver CityBus is well informed of the many languages used by its customer base. In November 2011 Culver CityBus created a Limited English Proficiency Assessment and Implementation (LEP) Plan to ensure “meaningful” access to transit services and programs. This plan was updated in May 2017.

The assessment discovered, according to the 2015 American Community Survey, 12% of residents in the Culver CityBus service area spoke English “less than very well.” The data indicated that this was particularly the case for the Spanish language (see Table 3).

As a result, Culver CityBus is implementing several language assistance measures to aid these limited English proficient individuals. The measures are aimed at those language groups with the largest population percentages in the service area that included Spanish and Persian (Farsi) languages, the Chinese Mandarin and Cantonese dialects, as well as the Japanese, Korean and Arabic language groups.

To assist its LEP patrons, Culver CityBus has implemented the following measures:

- 1.) The City of Culver City (of which Culver CityBus is a department) has employees who may help translate in languages including Spanish, Chinese dialects, Japanese, Korean, Arabic and Farsi (employees providing Spanish, Arabic and Farsi translation services are compensated).

- 2.) Bus schedules, maps, fare/service change announcements, information for the Rider Relief Transportation Program and other transit publications will be made available in an alternative language for the Spanish speaking LEP population.
- 3.) Staff fluent in Spanish are available in the Culver CityBus administrative offices to handle inquiries and complaints from Spanish speaking callers.

Culver CityBus also trains its staff by providing copies of the language assistance measures contained in Culver CityBus' LEP Implementation Plan to all Culver CityBus employees and new hires.

Part of the LEP Implementation also details notifying LEP persons of all Culver CityBus services that are available. Special notices of route changes, public hearings, and holiday schedules are also posted in Culver CityBus buses in both English and Spanish.

Part of the plan commits to an annual monitoring regime in order to assure that it is up to date and improved upon as needed. A copy of the entire LEP Assessment and Implementation Plan is available in Appendix D.

I. Public Participation Plan

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

- Residents are given the opportunity to participate in the transportation planning process
- The issues and concerns of residents are given consideration in the selection of transportation investments
- Transportation investments do not disproportionately burden any population with adverse impacts

Public Participation Principles

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

- Culver CityBus will determine what non-English languages and other barriers may exist to public participation within the service area
- Culver CityBus will provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to LEP populations in its service area

- 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
- Public meetings and hearings will be broadly advertised in the community in non-English languages identified in the updated LEP Plan (Appendix D) 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, local print media, at local community centers such as the Culver City Senior Center, and on the website
- Culver CityBus will provide notification regarding the availability of language assistance at public meetings as described in the LEP Plan

Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations

When planning for public engagement, Culver CityBus will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum, Culver CityBus staff will implement strategies such as holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, advertising meetings and hearings in the primary languages spoken in the service area as identified in the updated LEP Plan, and providing notice of the availability of language assistance.

J. Minority Representation on Decision Making Bodies

Culver City does not have any exclusive commission or body directed towards Culver CityBus operations. City Council meetings provide the public venue for comments and feedback regarding any fare, service changes, or any other aspect of transit delivery. The City Council meetings are held twice per month and create a venue for our riders and members of the public at large to have an opportunity to comment publicly regarding Culver CityBus services. The City Council is an elected body and racial breakdown is therefore not provided.³⁰ Another forum that can involve Culver CityBus and the public is the Culver City Planning Commission, only if a planning item that includes a transit service component is included on the agenda.³¹

³⁰ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2017.

³¹ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2017.

Table 3: Culver CityBus Service Area Languages

Culver City Bus Service Area Languages					
Total Population 5 Years and Older					
344,701					
Language Group		Total in Language Group	Percent of Total Population	Speak English "less than very well" in Language Group	
				Number	Percent
English		206,760	60%		
Spanish		64,387	19%	19,202	30%
Indo-European		31,957	9%	7,699	24%
	French/Cajun	4,488	1.3%	730	16%
	French/Creole	212	0.1%	0	0%
	Italian	1,414	0.4%	179	13%
	Portuguese	1,296	0.4%	295	23%
	German	2,083	0.6%	108	5%
	Yiddish	190	0.1%	5	3%
	West Germanic	474	0.1%	35	7%
	Scandinavian	742	0.2%	25	3%
	Greek	486	0.1%	60	12%
	Russian	2,889	0.8%	980	34%
	Polish	391	0.1%	95	24%
	Serbo-Croatian	365	0.1%	31	9%
	Slavic	342	0.1%	28	8%
	Armenian	962	0.3%	226	24%
	Persian	9,383	2.7%	3,439	37%
	Gujarathi	743	0.2%	123	17%
	Hindi	2,524	0.7%	285	11%
	Urdu	1,154	0.3%	350	30%
	Other Indic	1,228	0.4%	470	38%
	Other Indo-European	591	0.2%	235	40%
Asian/Pacific Islander		34,643	10%	12,585	36%
	Chinese				
	Mandarin**	6,797	2.0%	2,633	39%
	Cantonese**	6,479	2.0%	2,510	39%
	Japanese	5,012	1.5%	2,366	47%
	Korean	5,851	1.7%	2,222	38%
	Khmer, Cambodian	348	0.1%	203	58%
	Miao Hmong	79	0.0%	0	0%
	Thai	801	0.2%	478	60%
	Laotian	61	0.0%	35	57%
	Vietnamese	1,881	0.5%	383	20%
	Other Asian	2,088	0.6%	490	24%
	Tagalog	4,217	1.2%	953	23%
	Other Pacific Islander	1,029	0.3%	312	30%
All Other Languages		6,954	2.0%	2,060	30%
	Navajo	0	0.0%	0	0%
	Other Native Am	0	0.0%	0	0%
	Hungarian	383	0.1%	96	25%
	Arabic	3,310	1.0%	1,381	42%
	Hebrew	1,479	0.4%	263	18%
	African	1,550	0.4%	250	16%
	Other Unspecified	232	0.1%	70	30%

Source: Language Spoken at Home by Ability to Speak English for the Population 5yrs and Older; Derived from U.S. Census Bureau, American Community Survey, 2015

**Mandarin and Cantonese Proportion of Chinese Speakers Derived from 2005 Census American Community Survey for Los Angeles-Riverside-Orange County CSMA. Census 2010 data did not differentiate-listed Chinese only.

Created by Diversified Transportation Solutions - 2017

III. PROGRAM SPECIFIC REQUIREMENTS

Culver CityBus operated 43 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 are assessed every three years and were reviewed with the most recent transit system Line-by-Line Analysis completed in 2015.

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%.³² To prevent the load factors from being exceeded, Culver CityBus has created three trippers to ease any overcrowding on their busiest lines.³³

Vehicle Headway

Vehicle headway is the measurement of time between buses on a line. Culver CityBus generally operates fixed-route service with vehicle headways between 15-60 minutes during weekday peak periods, and during weekday off-peak periods and weekends.³⁴

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 on-time performance, since 2014 Culver CityBus has installed bus signal priority at several congested intersections within Culver City limits, with a projected completion date set for late 2017.³⁵

³² Culver CityBus Title VI Assessment Update 2011

³³ Ibid

³⁴ Culver CityBus Schedules, 2017

³⁵ Culver CityBus, 2016 Short Range Transit Plan

Service Availability

Service availability generally 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 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 realizes has procured additional buses to broaden feeder bus service to the new stations.³⁶ Additionally, Culver CityBus has altered its service availability due to expanded and new developments in its service area. The Playa Vista mixed use development, West Los Angeles College expansion, Los Angeles International Airport expansion, and Hayden Tract all affect service demand, local traffic generation, and scheduling and service has been altered in response.³⁷

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 jurisdictions determine the placement of transit amenities. The older stop furniture is in the process of being replaced along with roadway

³⁶ Ibid

³⁷ Ibid

and sidewalk improvements. Partial funding has been acquired for this effort and along with ongoing efforts the remaining funds will be secured.³⁸

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 twelve (12) buses designated for Line 6 Rapid services; these buses are identified with a specific paint scheme 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.³⁹ This ensures that riders are supplied with newer vehicles for the near future. Characteristics of the Culver CityBus fleet beginning in June 2014 are listed in Table 4.

Table 4: Fleet Characteristics⁴⁰

Culver City Municipal Bus Lines Fleet Inventory - May 2017				
Year Built	Manufacturer	Seats	Length	Total Vehicles
2001	New Flyer	36	40'	9
2003	New Flyer	21	30'	1
2004	New Flyer	36	40'	2
2009	New Flyer	36	40'	6
2011	New Flyer	36	40'	4
2012	New Flyer	36	40'	16
2014	New Flyer	40	40'	6
2016	New Flyer	40	40'	10
Totals				54

³⁸ Culver CityBus, 2016 Short Range Transit Plan

³⁹ Ibid

⁴⁰ Culver CityBus Vehicle Listing, May 4, 2017

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 services 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

FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2017 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE (Required of all Applicants for federal assistance to be awarded by FTA and all FTA Grantees with an active Capital or Formula Award)

AFFIRMATION OF APPLICANT

Name of the Applicant: City of Culver City

Name and Relationship of the Authorized Representative: Art A. Ida, Transportation Director

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 2017, 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 2017.

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.

Signature 

Date: 2/8/17

Name Serena Wright, Administrative Services Director
Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): City of Culver City

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.

Signature 

Date: 2/8/17

Name Carol Schwab, City Attorney
Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA and each FTA Recipient with an active Capital or Formula Project or Award must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within FTA's electronic award and management system, provided the Applicant has on file and uploaded to FTA's electronic award and management system this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

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 the 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 Transportation Director.

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

Section I		
Name:	Telephone (Work):	
Address:		
Telephone (Home):	E-mail Address:	
Accessible Format Requirements?	<input type="checkbox"/> Large Print <input type="checkbox"/> TDD	<input type="checkbox"/> Audio Tape <input type="checkbox"/> Other
Section II		
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
Section III		
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.		
Section IV		
Have you previously filed a Title VI complaint with this agency? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Section V		
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 Court	<input type="checkbox"/> Federal Agency	<input type="checkbox"/> State Agency
<input type="checkbox"/> State Court	<input type="checkbox"/> Local Agency	
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone:	
Address:		
Section VI		
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

Sección I	
Nombre:	Teléfono (trabajo):
Dirección:	
Teléfono (casa):	Dirección de correo electrónico:
¿Requisitos de formato accesible? <input type="checkbox"/> Impresa grande <input type="checkbox"/> Cinta de audio <input type="checkbox"/> Teléfono de texto <input type="checkbox"/> Otro	
Sección II	
¿Presenta usted esta queja en su nombre propio? <input type="checkbox"/> Si * <input type="checkbox"/> No	
* Si usted contestó "sí" a esta pregunta, vaya a la sección III.	
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"/> Si <input type="checkbox"/> No	
Sección III	
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.	
Sección IV	
¿Usted ha presentado una demanda de Título VI ante esta agencia anteriormente? <input type="checkbox"/> Si <input type="checkbox"/> No	
Sección V	
¿Usted ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? <input type="checkbox"/> Si <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:	
Sección VI	
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:

**METHODOLOGY TO ANALYZE SERVICE AND
FARE CHANGES**

Methodology to Analyze the Impacts on Minority and Low-income Riders of Future Fare and Major Service Changes

Fare Change

Under the new Title VI rules, transit agencies with fewer than 50 peak hour service vehicles are not required to do a fare equity analysis. When considering a raise in fare, Culver CityBus will notify (in both English and Spanish) the public per its established public notification process (i.e. information on bus, email notifications, etc.) to encourage the public to submit their comments. The comments received will be taken into consideration, along with the fiscal situation of the agency. Culver CityBus is a small agency that does not have many financial resources, and the financial sustainability of the service operation must be taken into serious consideration when determining a fare change. To assist the low-income riders, the agency provides information and promotes the availability of subsidy program for low-income riders, such as the Rider Relief Transportation Program (RRTP), to help minimize the impacts of the fare change.

Service Change

Under the new Title VI rules, transit agencies with fewer than 50 peak hour service vehicles are not required to do a service equity analysis. However, any potential impacts to the minority and low-income riders, to the best of Culver CityBus' knowledge, will be considered in the implementation of the reduction in service. Culver CityBus will notify the public of any planned addition in service. In the case of the reduction in service, Culver CityBus will notify (in both English and Spanish) and solicit comments from the public per our established public notification process (i.e. information on bus, email notifications, etc.). Information obtained from the comments received will be taken into consideration in the final implementation of reduction in service.

REVISED: February 25, 2013

APPENDIX D:

**LEP ASSESSMENT AND IMPLEMENTATION
PLAN FOR CULVER CITYBUS**

LIMITED ENGLISH PROFICIENCY [LEP] PLAN

CULVER CITY MUNICIPAL BUS LINES CITY OF CULVER CITY, CALIFORNIA

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Culver City Municipal Bus Lines' (Culver CityBus) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person 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."

Culver CityBus is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services on the basis of race, color, or national origin.

This plan was developed to guide Culver CityBus in its administration and management of Title VI related activities.

Plan Summary

Culver CityBus has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This 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 notify LEP persons that assistance is available. In order to prepare this plan, Culver CityBus undertook 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.

A summary of the results of the four-factor analysis is 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.

Culver CityBus reviewed 2010 U.S Census tract level data, and the 2015 American Community Survey. Those census tracts that were within ¼ mile of a Culver CityBus route were considered part of the Culver CityBus service area. The review indicated that the total service area has a population of 344,701 that are five years of age or older. Of those persons, 41,546 (12.1%) speak English “not well” or “not at all.” Of those persons with limited English proficiency, 19,202 (46.2%) speak Spanish. The next language listed with the highest number of persons that speak English “not well” or “not at all” is the Farsi language (Persian) at 3,439 persons (8.3%). A number of other language groups make up the remainder of limited English speaking persons in the service area.

As detailed in Figures 1 through 3, census tracts with the majority of limited English speaking persons of Spanish descent were located primarily in the Mar Vista area west of the 405 Freeway, south of the Mar Vista community, and at the eastern end of the Culver CityBus service area. Areas in which limited English speaking persons speaking Persian languages (i.e. Farsi) were located were in the northern and eastern ends of the Culver CityBus service area, and near Westchester. These tracts had a population of limited English speaking persons ranging from 20% to over 60%.

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

Culver CityBus reviewed 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 the survey of Culver CityBus bus operators and telephone staff, approximately 62% of all persons surveyed indicated that they have daily interaction with LEP persons. Additionally, the survey found that 34% of survey respondents indicated they had interaction with LEP persons at least five or more times each day. Lines 1 (Washington Blvd.) and 6 (Sepulveda Blvd.) were the routes most cited by bus operators for interaction with limited English speaking passengers. The predominant language encountered by bus operators is Spanish, with bus operators reporting some interaction with passengers speaking languages other than English and Spanish, including Korean, Japanese and Chinese language dialects. There have also been very few requests made to bus operators for language translation of public information, with 90% of operators indicating that passengers do not request translated materials.

Figure 1: Percentage of English Language Speakers by Census Tract

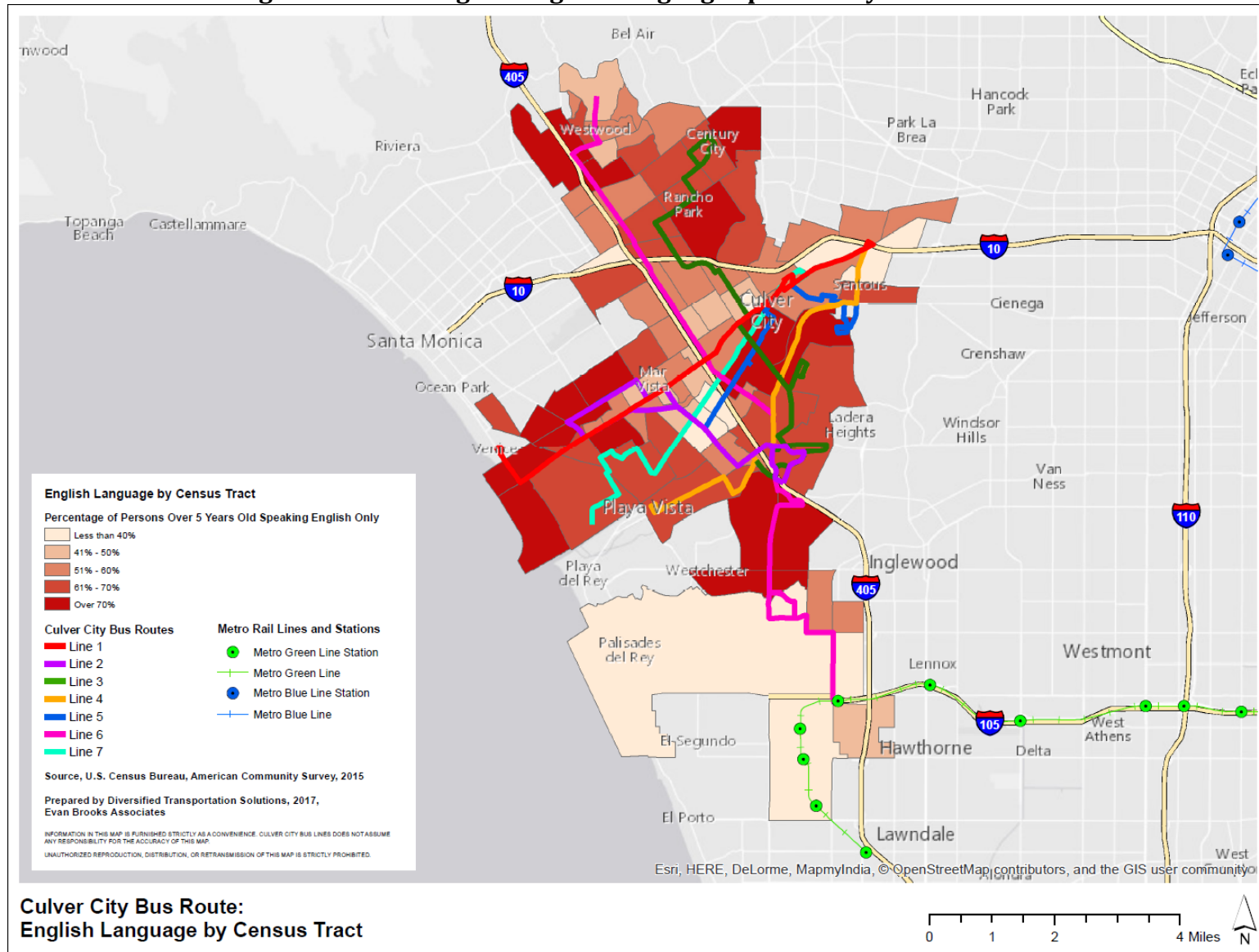


Figure 2: Percentage of Spanish Language Speakers with Little or No English Proficiency by Census Tract

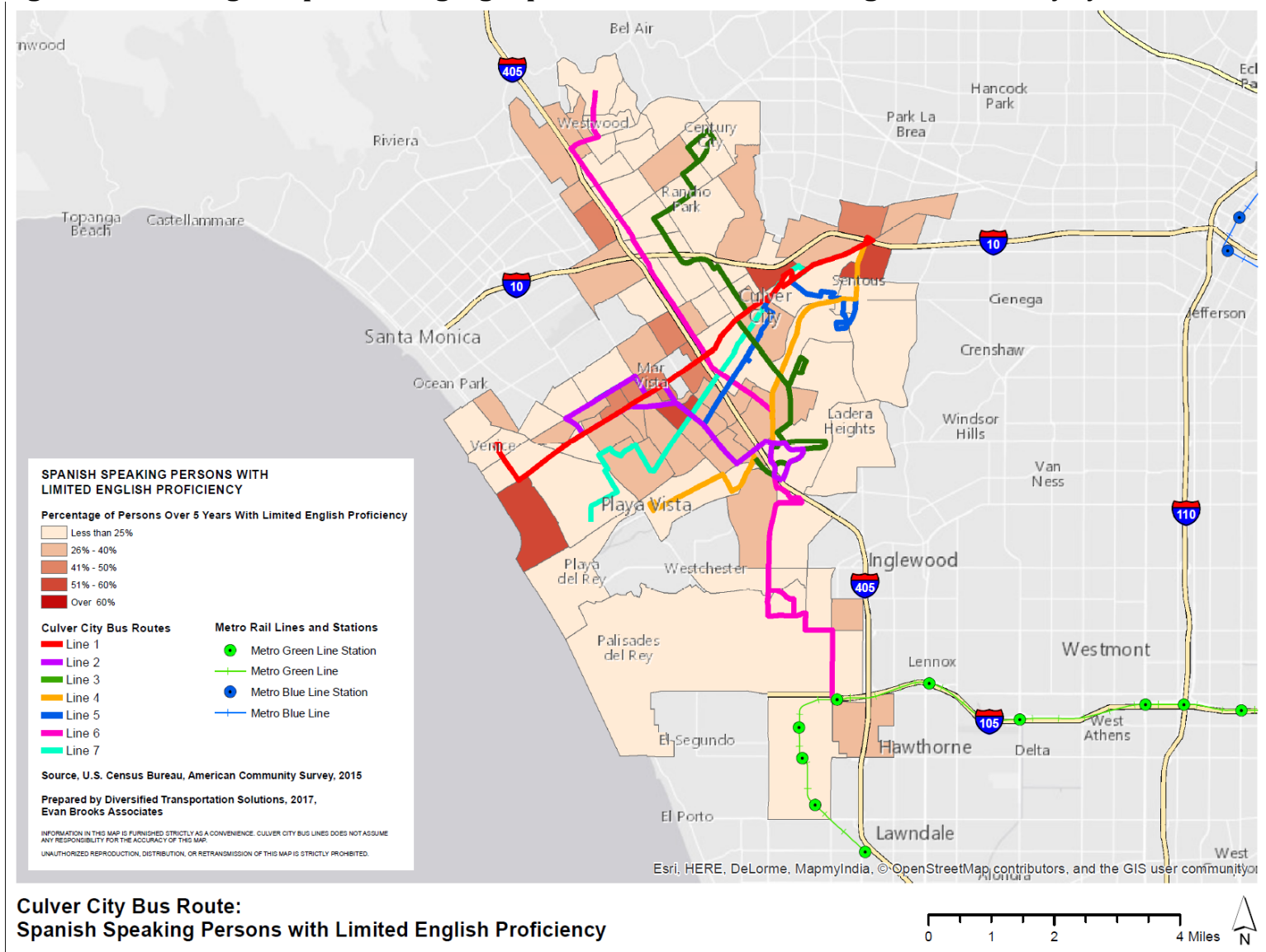
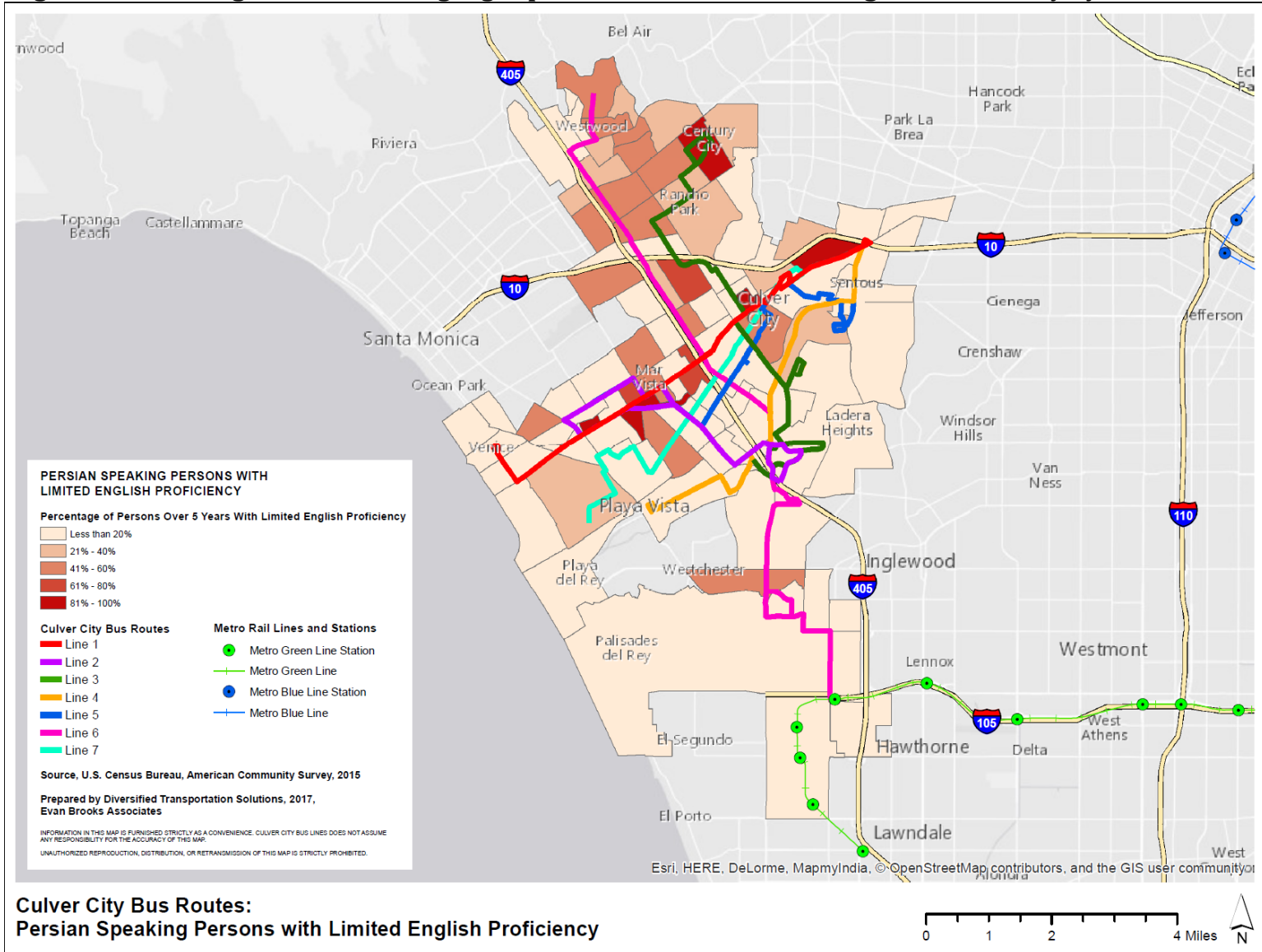


Figure 3: Percentage of Persian Language Speakers with Little or No English Proficiency by Census Tract



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

As detailed in Figures 1 through 3, census tracts with the majority of limited English speaking persons were located primarily in the northern and eastern portions of the Culver CityBus service area, and in Mar Vista and neighborhoods south of Mar Vista. Culver CityBus services in the Washington Blvd., Sepulveda Blvd., Inglewood Blvd. and Culver Blvd. corridors provide service to the largest geographic concentrations of LEP individuals in the Culver CityBus service area. In some areas along these corridors 40% or more of persons speaking Spanish or Persian (Farsi) languages have little or no English proficiency. The Culver City Senior Center, located near Culver CityBus Lines 1, 3 and 7, provides educational, recreational and social services to community residents. In speaking with the City's Senior and Social Services Manager, Armando Abrego, and with assistance from Darren Uhl, Disability & Social Services Specialist, it was indicated that the center hosts a variety of cultural and language groups that meet on a regular basis including the Latino Group, Chinese-American Group, and language clubs for Spanish, German, and French speaking persons. Staff at the center have contact with LEP persons on a daily basis, particularly with the various groups meeting at the center. The senior center is also contacted by up to five new persons each day with limited English proficiency to inquire about services and information.

Mr. Abrego and Mr. Uhl estimate that about 20% of senior center attendees access the facility by transit, particularly regular paratransit riders. Attendees also access the senior center via Culver CityBus, Culver City Dial-A-Ride, Access Paratransit, LADOT City Ride, and ride-hailing services such as Lyft & Uber. Senior center staff has received comments on specific transportation needs of center attendees including a desire for more paratransit service, a desire for paratransit service to travel further than the city limits, and a transit loop routing that links the senior center, Downtown Culver City and various local activity centers. Also requested has been affordable services for transportation to and from medical and surgical procedures. Mr. Abrego and Mr. Uhl also suggested it may be helpful for seniors and the limited English speaking community for area transit providers to periodically visit the center and set up information tables to assist persons in understanding transit services and to sign up for available services, and to provide the senior center with printed public transit materials in Spanish. Culver CityBus is responding to these needs and requests.

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

Culver CityBus reviewed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise, and evaluated resources that could be used for outreach and translation efforts. Based on the four-factor analysis, Culver CityBus developed its LEP Plan as outlined in the following sections.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Culver CityBus programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. Culver CityBus will determine when interpretation and/or translation are needed and are reasonable. How the Culver CityBus staff may identify an LEP person who needs language assistance is outlined below:

- Examine 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.
- When Culver CityBus sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Have Census Bureau *Language Identification Flashcards ("I Speak Cards")* available at Culver CityBus events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- Have Census Bureau *Language Identification Flashcards ("I Speak Cards")* available for bus operators and customer service desk staff to assist them with identifying language assistance needs.
- Network with local community service centers, such as the Culver City Senior Center, that 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.
- Add a question to the Culver CityBus Line-by-Line Analysis survey that is conducted every three years, which asks passengers to indicate the primary language spoken in their household. This will provide another means to accurately identify LEP levels in the service area.

Language Assistance Measures - Culver CityBus will strive to offer the following measures to LEP individuals, that is, persons who speak English "not well" or "not at all:"

- The Culver CityBus Title VI Policy and Culver CityBus staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.

- If a client asks for language assistance and Culver CityBus determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, Culver CityBus will provide the language assistance in the LEP client's preferred language. Culver CityBus has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
- Culver CityBus will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.
- The City of Culver City (of which Culver CityBus is a department) has employees who can help translate in languages other than Spanish, for example, Chinese dialects, Japanese, American Sign Language, Farsi and Arabic (Spanish, Farsi and Arabic are translation services for which employees are compensated).
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance at one or more of the available resources identified under the section "*Formal Interpreters*" on Page 10.
- Consider the use of a computerized translation tool that can help translate the Culver CityBus website into any language LEP persons are fluent in.
- Translation of any Culver CityBus policy is available, upon request.

Safe Harbor Stipulation

Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translations under certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Culver CityBus' translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

In the Culver CityBus service area, a number of language groups constitute the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided under the safe harbor standard. These language groups include the Spanish-speaking language group (19%), and the following populations which exceed the 1,000 threshold: Farsi (Persian) at 3,439, Mandarin at 2,633, Cantonese at 2,510, Japanese at 2,366, Korean at 2,222, and Arabic at 1,381.⁴¹

The Culver City Transportation Department has determined that while the demographics of the Culver CityBus service area include these populations of limited English proficient individuals, people other than those who are Spanish-speaking do not comprise our customer base and are not dependent on public transit for transportation services. While bus operators come in contact with passengers who speak many foreign languages, there has been no report of language difficulty or requests from riders for alternative language translation.

Thus, 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, and 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.

Staff Training

The following training will be provided 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*.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- Bus operators are trained to seek translation assistance from other passengers onboard the bus when they are either unable to understand or communicate with an LEP person.

Information will be distributed to all Culver CityBus staff.

Culver CityBus will incorporate the training video developed by the FTA on Title VI

⁴¹ Percentages and population values reflect the data for each language group within the total number of persons that speak English “less than well” (see Table 3).

requirements into the Bus Operator Training Program as well as training of customer service staff. The video explains the language access requirement of Title VI, and teaches our employees how to appropriately handle the requests from LEP persons.

In addition, City personnel who are paid to provide assistance with Spanish, Farsi and Arabic translation are required to pass a test administered by the City of Culver City in order to demonstrate their language proficiency.

Translation of Documents

- In those cases where the need arises for LEP outreach, Culver CityBus will consider the following options:
 - When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
 - Bus schedules, maps, fare/service change announcements, information for the Rider Relief Transportation Program and other transit publications will be made available in an alternative language for the known LEP population.

Formal Interpreters

- When necessary to provide meaningful access for LEP clients, Culver CityBus will provide qualified interpreters, including any bilingual staff of the City of Culver City, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with languages identified as being predominant for our Culver CityBus ridership.
- Culver CityBus may require a formal interpreter to certify to the following:
 - The interpreter understood the matter communicated and rendered a competent interpretation.
 - The interpreter will maintain private information. Non-public data will not be disclosed without written authorization from the client.
 - Bilingual City employees, when available, can provide limited assistance to Culver CityBus staff and LEP clients as part of their regular job duties. Currently, Culver CityBus has three full-time staff members (one of which provides customer service assistance daily) that can provide language assistance to LEP persons.

Informal Interpreters

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. Culver CityBus staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to

provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.

- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by Culver CityBus. If possible, Culver CityBus should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter, after Culver CityBus has offered free interpreter services, the informal interpreter may interpret.
- If an LEP client wants to use his or her own informal interpreter, Culver CityBus reserves the right to also have a formal interpreter present.

Monitoring

Monitoring and Updating the LEP Plan - Culver CityBus will update the LEP Plan as required by U.S. DOT. At a minimum, the plan will be reviewed and updated if demographic information indicates that higher concentrations of LEP individuals are present in the Culver CityBus service area. Updates will include the following:

- The estimated number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether the transit system's financial resources are sufficient to fund language assistance resources needed
- Determine whether Culver CityBus fully complies with the goals of this LEP Plan
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

Dissemination of the Culver CityBus LEP Plan

- A link to the Culver CityBus LEP Plan and the Title VI Plan are included on the City of Culver City website listed below:
<http://www.culvercity.org/enjoy/culver-city-bus/contact-us>
- Any person or agency with internet access will be able to access and download the plan from the City of Culver City website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan 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 the Title VI Coordinator, Culver CityBus, 4343 Duquesne Avenue, Culver City, CA 90232, phone number (310) 253-6500.