

Culver City Municipal Bus Lines *Title VI Report* *2014 Information Update*



Prepared By:



In Association With:

Jeremy Bailey Consulting
Kam Research

MAY 2014



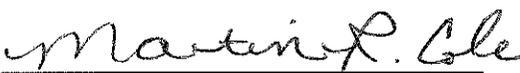
1 NOW, THEREFORE, the City Council of the City of Culver City, DOES HEREBY
2 RESOLVE as follows:

- 3 1. That the City Council hereby adopts the Culver City Transportation
4 Department Title VI Program Update of May 2014, attached hereto as Exhibit
5 A.
6 2. That the City Manager, or his designee, is hereby authorized to develop,
7 implement, monitor and execute all required documents necessary to comply
8 with Title VI Program requirements of 49 CFR part 21 and FTA Circular
9 4702.1B.
10 3. That the City Clerk shall attest and certify to the passage and adoption of this
11 resolution and it shall become effective immediately upon its approval.
12

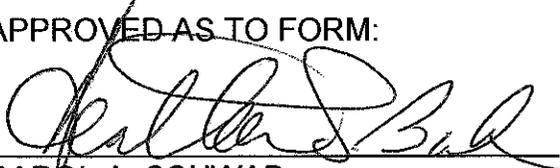
13 APPROVED and ADOPTED this 9th day of June, 2014.

14
15 
16 _____
17 MEGHAN SAHLI-WELLS, Mayor
18 City of Culver City, California

19 ATTEST:

20 
21 _____
22 MARTIN R. COLE
23 City Clerk

APPROVED AS TO FORM:

24
25 
26 _____
27 for CAROL A. SCHWAB
28 City Attorney

A14-00444

Resolution 2014-R044

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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 regulations were set forth to assure equal access to transit services regardless of race, ethnicity, gender, or income. To demonstrate compliance with these provisions, Culver CityBus is submitting this report in accordance with FTA Circular 4702.1B.

B. Background of the Service Area

Culver CityBus serves 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 City is 5 square miles and situated on the west side of metropolitan Los Angeles between Santa Monica to the north, Westchester and Inglewood to the south, Los Angeles to the east, with Venice and Marina Del Rey to the west. The Culver CityBus total service area encompasses 40 square miles with a population of about 325,621 people.¹

Culver City was incorporated in 1917 and the U.S. Census Bureau estimates the 2012 population at 39,313,² while the median age of residents is 41.5³ years, and the median household income is \$67,736.⁴ Culver City represents 0.4% of Los Angeles County's total population.⁵ The breakdown of the population in terms of race for the Culver CityBus service area is as follows:

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

Culver City Bus Service Area 2010 Census Tracts: Race and Ethnicity				
White	Hispanic or Latino	African Am	Asian	Am Indian and Alaska Native
51%	20%	9%	16%	0%
Native Hawaiian and Other Pacific Islander	Other Race	Two or More Races	Total Minority	Total Non-Minority
0%	0%	3%	49%	51%

Source: U.S. 2010 Census: American Community Survey

¹ U.S. Census Bureau, 2010. American Community Survey

² U.S. Census Bureau, 2012 Culver City Quick Facts <http://quickfacts.census.gov/qfd/states/06/0617568.html>

³ SCAG, 2012. Profile of Culver City. <http://www.scag.ca.gov/Documents/CulverCity.pdf>

⁴ Ibid

⁵ Ibid

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 MTA's Metro Expo and Green Lines.

C. Culver CityBus

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.

Beginning in June 2014, the Department's total fleet is comprised of 54 New Flyer 40-foot low-floor compressed natural gas (CNG) buses and two (2) 30-foot low-floor CNG buses in a contingency fleet.⁶ Culver CityBus coordinates its service schedules with surrounding transit providers like the MTA, Santa Monica's Big Blue Bus, and 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 low cost, easily accessible public transportation for 5.6 million unlinked passenger trips annually.⁷ Culver CityBus accrues about 18 million annual passenger miles and 1.6 million annual vehicle revenue miles.⁸ Table 2 provides the peak frequencies of service by day for all Culver CityBus routes.

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.

⁶ Jane Leonard, Sr. Management Analyst, Culver City Transportation Department

⁷ Culver CityBus, 2013 Short Range Transit Plan

⁸ National Transit Database, 2013. Culver City Municipal Bus Lines Transit Profile

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 throughout Los Angeles County.

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 Ctr to Venice	15	15	15
2	Inglewood Blvd: Westfield Culver City Mall to Venice HS	60		
3	Crosstown: Westfield Culver City Transit Ctr to Westfield Century City Mall	20 (40-60 for West L.A. College and is seasonally adjusted)	30	30
4	Jefferson Blvd: West Los Angeles Transit Ctr to Westfield Culver City Transit Ctr	30 (60 for West L.A. College and is seasonally adjusted)		
5	Braddock Dr: School Tripper to Venice HS	60 (Operates twice per day with limited stops)		
6	Sepulveda Blvd: UCLA to Metro Green Ln	15-25	20-30	20
6 Rapid	Sepulveda Blvd: UCLA to Metro Green Ln	15-20 (AM and PM peak only)		
7	Culver Blvd: Culver City Hall to Marina Del Rey	30-40		

Source: Culver City Bus Schedules (2014)

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.

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

⁹ Culver City General Plan, 1995. Circulation Element

¹⁰ Ibid

¹¹ Ibid

¹² Ibid

- 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
 - 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 MTA funding to enhance feeder service to MTA 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

¹³ Culver City General Plan, 1995. Circulation Element

¹⁴ Ibid

¹⁵ Ibid

¹⁶ Ibid

¹⁷ Ibid

¹⁸ Ibid

¹⁹ Ibid

²⁰ Ibid

²¹ Ibid

²² Ibid

- 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

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

Part of Culver CityBus Title VI responsibilities is 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:

“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 4343 Duquesne Avenue, Culver City, CA 90232.”

The following notice was created and made available to the public on July 30th 2011 and is available in Spanish and posted 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 – Non-Discrimination” at the following address:

“<http://www.culvercity.org/Government/Transportation/Bus/AboutUs.aspx>.”

Culver CityBus is in the process of updating the Title VI notice to include the website address and general instructions on procedures for filing a Title VI complaint.

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 form and 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

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

²⁵ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2014.

²⁶ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2014.

E. Signed Assurances

The signed FTA assurances were submitted through the FTA's web-based grants administration system, TEAM-Web, on March 4, 2014 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.
- 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;

²⁷ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2014.

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

²⁹ Federal Transit Administration, Title VI Circular FTA C 4702.1B, 2012.

- 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 as “take-ones” in all Culver CityBuses 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 (LACMTA) 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 2014.

The assessment discovered, according to the 2010 census, 14% of residents in the Culver CityBus service area spoke English “less than very well.” The data indicated that this was particularly the case for both the Spanish and Japanese languages (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, Japanese and Persian (Farsi) languages.

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, and Vietnamese (but only Spanish translation services are paid).
- 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 Involvement 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 all populations in the 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, and local community centers such as the Culver City Senior Center

- 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 publically regarding Culver CityBus services. The City Council is an elected body and racial breakdown is therefore not provided.³⁰

³⁰ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2014.

Table 3: Culver CityBus Service Area Languages

Culver City Bus Service Area Languages					
Total Population 5 Years and Older					
325,621					
Language Group		Total in Language Group	Percent of Total Population	Speak English "less than very well" in Language Group	
				Number	Percent
English		199,154	61%		
Spanish		61,133	19%	25,068	41%
Indo-European		28,352	9%	7,625	27%
	French/Cajun	4,246	1.0%	807	19%
	French/Creole	156	0.0%	0	0%
	Italian	1,588	0.5%	325	20%
	Portuguese	1,484	0.4%	324	22%
	German	2,409	0.7%	176	7%
	Yiddish	127	0.0%	0	0%
	West Germanic	477	0.1%	11	2%
	Scandinavian	823	0.2%	29	4%
	Greek	417	0.1%	62	15%
	Russian	2,378	0.6%	1,338	56%
	Polish	271	0.1%	82	30%
	Serbo-Croatian	333	0.1%	29	9%
	Slavic	381	0.2%	102	27%
	Armenian	745	0.2%	195	26%
	Persian (Farsi)	7,683	2.0%	3,140	41%
	Gujarathi	459	0.1%	126	27%
	Hindi	1,546	0.5%	250	16%
	Urdu	1,471	0.5%	382	26%
	Other Indic	854	0.3%	161	19%
	Other Indo-European	504	0.2%	86	17%
Asian/Pacific Islander		30,622	9%	11,745	38%
Chinese	Mandarin**	5,085	1.5%	1,848	36%
	Cantonese**	4,846	1.5%	1,761	36%
	Japanese	6,643	2.1%	3,399	51%
	Korean	4,686	1.4%	1,942	41%
	Khmer, Cambodian	262	0.1%	41	16%
	Miao Hmong	31	0.0%	31	100%
	Thai	484	0.2%	227	47%
	Laotian	12	0.0%	12	100%
	Vietnamese	1,570	0.5%	591	38%
	Other Asian	2,006	0.6%	566	28%
	Tagalog	3,763	1.1%	938	25%
	Other Pacific Island	1,234	0.4%	389	32%
All Other Languages		6,360	2.0%	1,339	21%
	Navajo	0	0.0%	0	0%
	Other Native Am	28	0.0%	0	0%
	Hungarian	273	0.1%	47	17%
	Arabic	1,990	0.6%	771	39%
	Hebrew	1,398	0.4%	138	10%
	African	2,457	0.8%	329	13%
	Other Unspecified	214	0.1%	54	25%

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, 2010
 **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.
 *Threshold for Culver City Bus 3,256 (1% of total population)
 Created by Diversified Transportation Solutions- 2014

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 February 2012.

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%.³¹ To prevent the load factors from being exceeded, Culver CityBus has created three trippers to ease any overcrowding on their busiest lines.³²

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 12-60 minutes during weekday peak periods, and between 15-60 minutes during weekday off-peak periods and weekends.³³

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 2012 Line-by-Line Analysis.

³¹ Culver CityBus Title VI Assessment Update 2011

³² Ibid

³³ Ibid

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.

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.

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 eight (8) 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.³⁴ This ensures that riders are supplied with newer vehicles for the near future. To demonstrate commitment to its policy, Culver CityBus is placing six new fixed route forty-foot CNG vehicles into service beginning in June 2014.³⁵ Characteristics of the Culver CityBus fleet beginning in June 2014 are listed in Table 4.

Table 4: Fleet Characteristics³⁶

Culver City Municipal Bus Lines Fleet Inventory - June 2014				
Year Built	Manufacturer	Seats	Length	Total Vehicles
2001	New Flyer	40	40'	12
2004	New Flyer	40	40'	8
2009	New Flyer	41	40'	6
2011	New Flyer	41	40'	20
2014	New Flyer	40	40'	6
Totals				54

³⁴ Ibid

³⁵ Personal Contact: Jane Leonard, Sr. Management Analyst: Culver CityBus, 2014.

³⁶ Bus Fleet List, Culver City Municipal Bus Lines, 2014.

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.

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APPENDIX A:

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

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**FEDERAL FISCAL YEAR 2014 FTA CERTIFICATIONS AND ASSURANCES
SIGNATURE PAGE**

(Required of all Applicants for FTA funding and all FTA Grantees with an active Capital or Formula Project)

AFFIRMATION OF APPLICANT

Name of the Applicant: CULVER CITY, CITY OF

Name and Relationship of the Authorized Representative: Martin R Cole

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 statutes and regulations, and 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 2014, 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 Project for which it seeks now, or may later seek FTA funding during Federal Fiscal Year 2014.

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 Martin R Cole Date: 3/4/2014

Name Martin R Cole

Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): CULVER CITY, CITY OF

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 Project or Projects.

Signature: Carol Schwab Date: 2/11/2014

Name: Carol Schwab

Attorney for Applicant

Each Applicant for FTA funding and each FTA Grantee with an active Capital or Formula Project must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its signature in lieu of the Attorney's signature, provided the Applicant has on file this Affirmation, signed by the attorney and dated this Federal fiscal year.

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APPENDIX B:

CULVER CITYBUS TITLE VI COMPLAINT INVESTIGATION PROCEDURES

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<p>CULVER CITYBUS TITLE VI COMPLAINT PROCEDURES</p>

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits of Culver CityBus. However, it does not deny the complainant the right to file formal complaints with the State of California, Federal Transit Administration, or seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

GENERAL

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with Culver CityBus, 4343 Duquesne Avenue Culver City, California 90232. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Coordinator (Senior Management Analyst) may be utilized for resolutions. The Title VI Coordinator will notify the Culver CityBus Transportation Director of all Title VI related complaints as well as all resolutions.

PROCEDURE

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination date when the complainants became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Transportation Director will determine its jurisdiction, acceptability, need for additional information, as well as assign the complaint to the Title VI Coordinator to investigate the merit of the complaint.
3. The complainant will be provided with a written acknowledgement that Culver CityBus has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
 - a. The complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve a Culver CityBus service of a Federal-aid recipient, sub-recipient or contactor.

5. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
6. Once Culver CityBus decides to accept the complaint for investigation, the complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying: complainant's name, basis, alleged harm, race, color and national origin of the complainant.
7. In cases where Culver CityBus assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, Culver CityBus' Title VI Coordinator will prepare an investigative report for review by the Transportation Director. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
8. The investigative report and its findings will be reviewed by the Transportation Director and in some cases the investigative report and findings will be reviewed by the Culver City City Attorney's Office. The report will be modified as needed.
9. The Transportation Director will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
 - a. In the event Culver CityBus is in noncompliance with Title VI regulations remedial actions will be listed.
10. Notice of Director's determination will be mailed to the complainant. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. Notice of appeals is as follows:
 - a. Culver CityBus will reconsider this determination if new facts, come to light.
 - b. If 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. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 201 Mission Street Suite 1650 San Francisco, CA 94105-1839.
11. 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.
12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

RECORDKEEPING REQUIREMENT

The Transportation Director will ensure that all records relating to Culver CityBus' Title VI complaint process are maintained with department records. Records will be available for compliance review audits.

Have you filed this complaint with any other federal, state or local agency or with any federal or state court? () Yes () No

If yes, check all that apply:

- () Federal agency () Federal court () State agency () State court
() Local agency

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

Name: _____

Address: _____

City, State and Zip Code: _____

Telephone Number: (____) _____

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

Signature

Date

Please mail this form to:

Culver CityBus
Title VI Coordinator
4343 Duquesne Avenue
Culver City, CA 90232

APPENDIX C:

**METHODOLOGY TO ANALYZE SERVICE AND FARE
CHANGES**

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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

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APPENDIX D:

LEP ASSESSMENT AND IMPLEMENTATION PLAN FOR CULVER CITYBUS

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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. 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 325,621 that are five years of age or older. Of those persons, 45,777 (14.1%) speak English “not well” or “not at all.” Of those persons with limited English proficiency, 25,068 (54.8%) speak Spanish. The next languages listed with the highest number of persons that speak English “not well” or “not at all” is Japanese at 3,399 persons (7.4%) and Persian at 3,140 persons (6.9%). 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 4, 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, and the eastern end of the Culver CityBus service area. Limited English speaking persons of Japanese descent were concentrated near Westwood and Century City, the Playa Vista area and the eastern end of the Culver CityBus service area. Areas in which limited English speaking persons speaking Persian languages (i.e. Farsi) were located 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 a low of 4% to over 50%.

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. To date, Culver CityBus staff has had infrequent requests for assistance in languages other than English. In an optional survey of bus operators, sixty-two (62) bus operators indicated a fairly high level of interaction with LEP persons. Approximately 70% of all bus operators surveyed indicated that they have daily interaction with LEP persons. Approximately 29% of bus operators surveyed interact with LEP persons 10 or more times a 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 predominate language encountered by bus operators is Spanish, with bus operators reporting some interaction with passengers possibly speaking Chinese dialects. Given the results of the census language assessment, many of these passengers may have been in the Japanese language category if operators were unable to distinguish between language differences. There have also been very few requests made to bus operators for language translation of public information, with 87% of operators indicating that passengers do not request translated materials.

Figure 1: Percentage of English Language Speakers by Census Tract

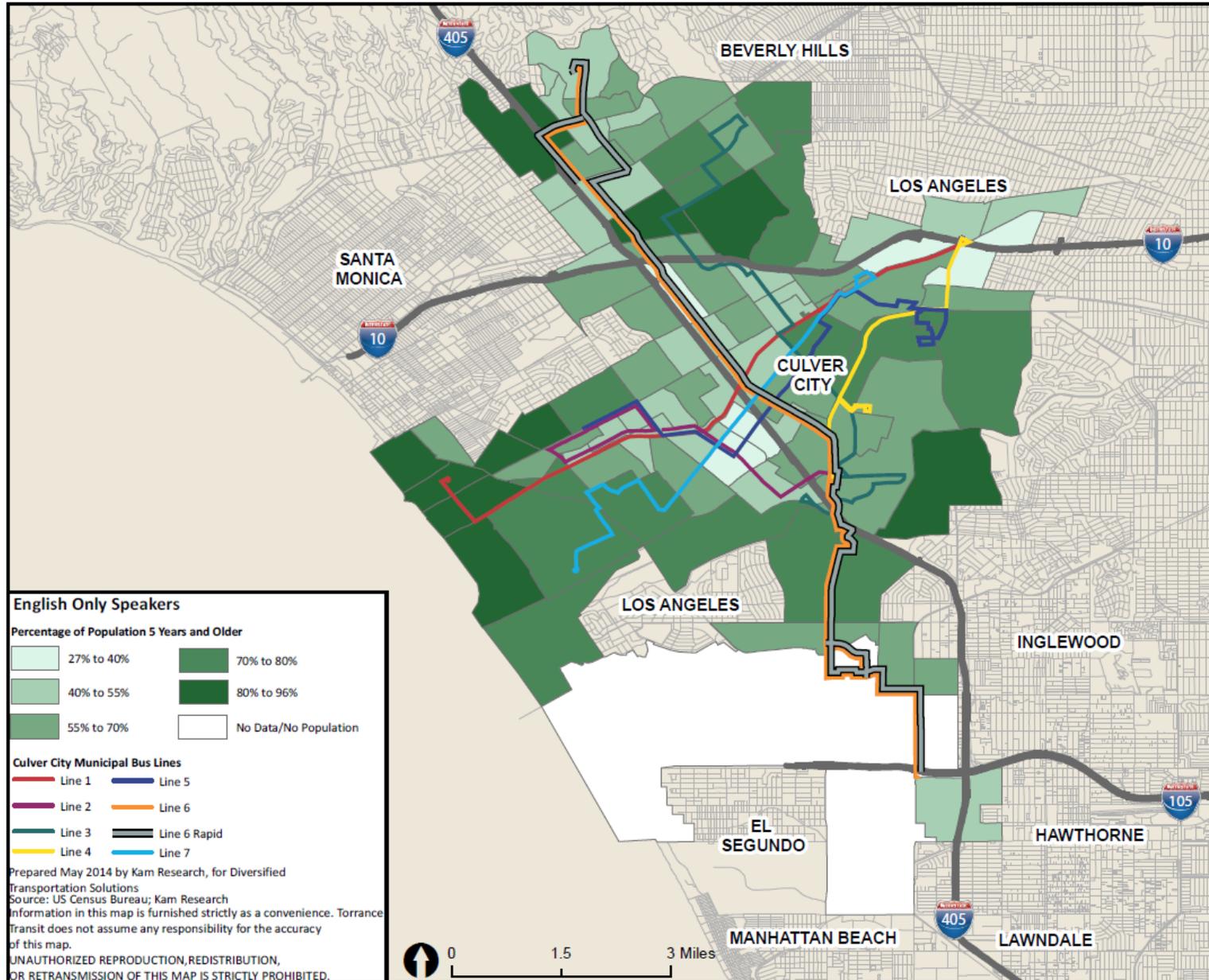


Figure 2: Percentage of Spanish Language Speakers with Little or No English Proficiency by Census Tract

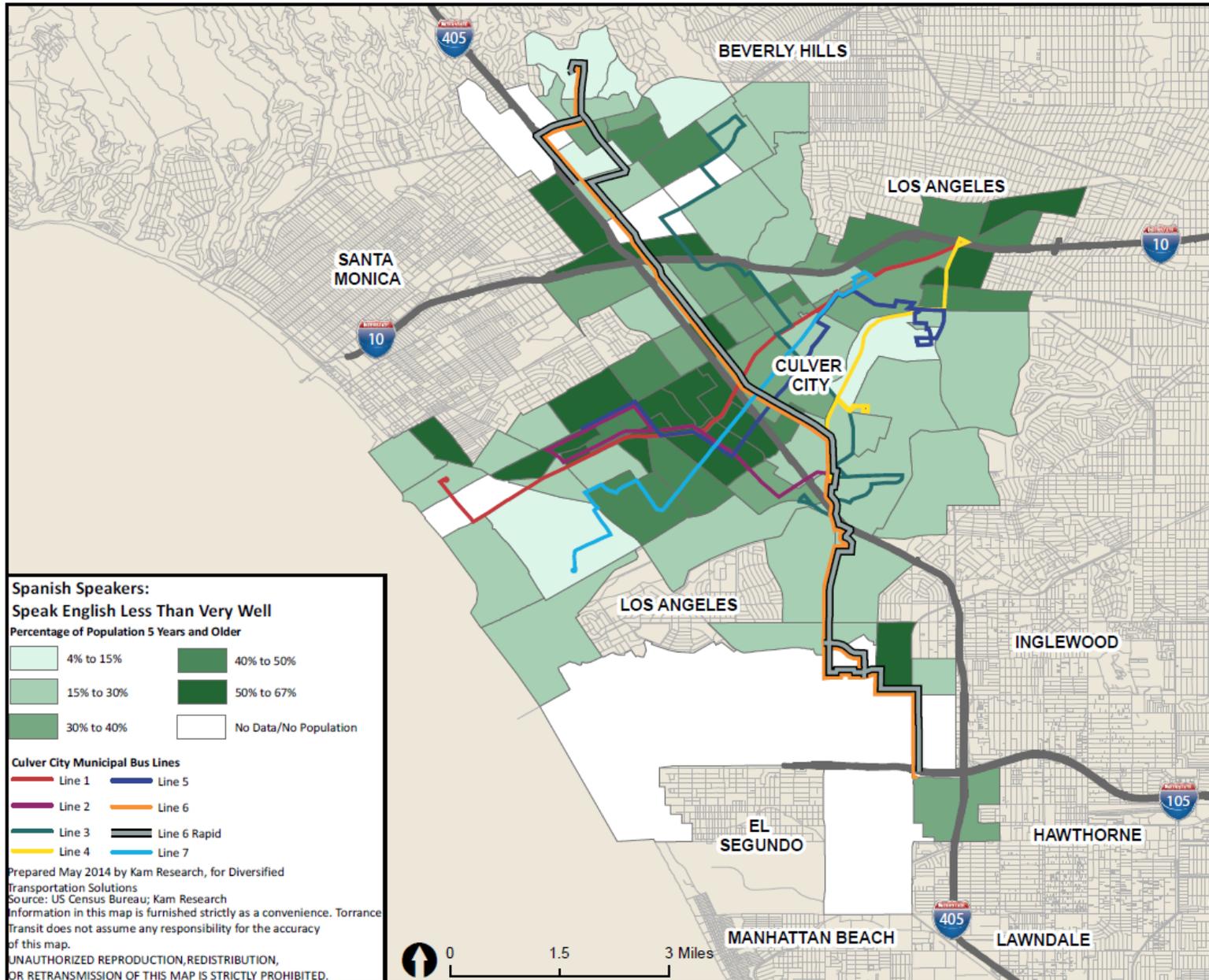


Figure 3: Percentage of Japanese Language Speakers with Little or No English Proficiency by Census Tract

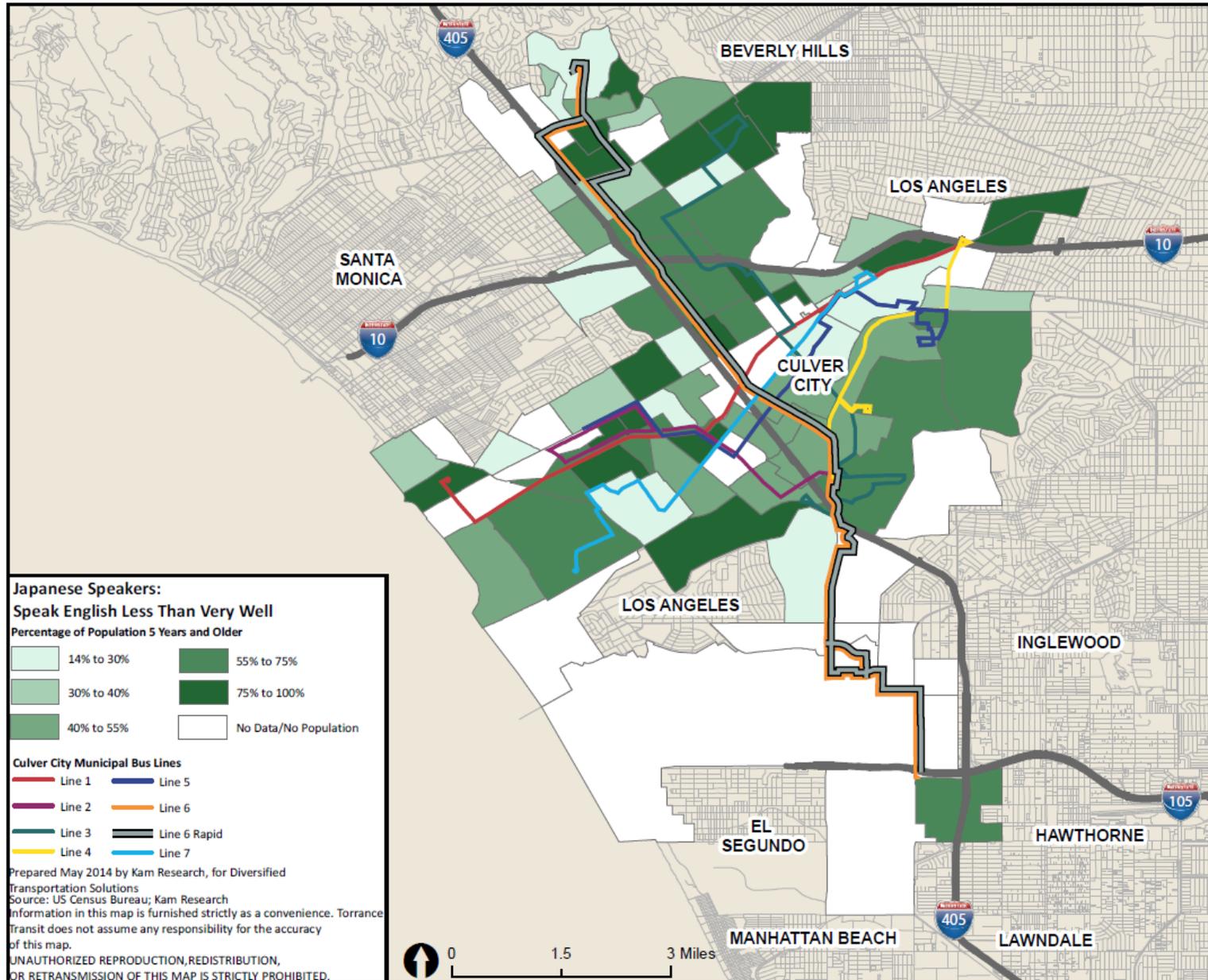
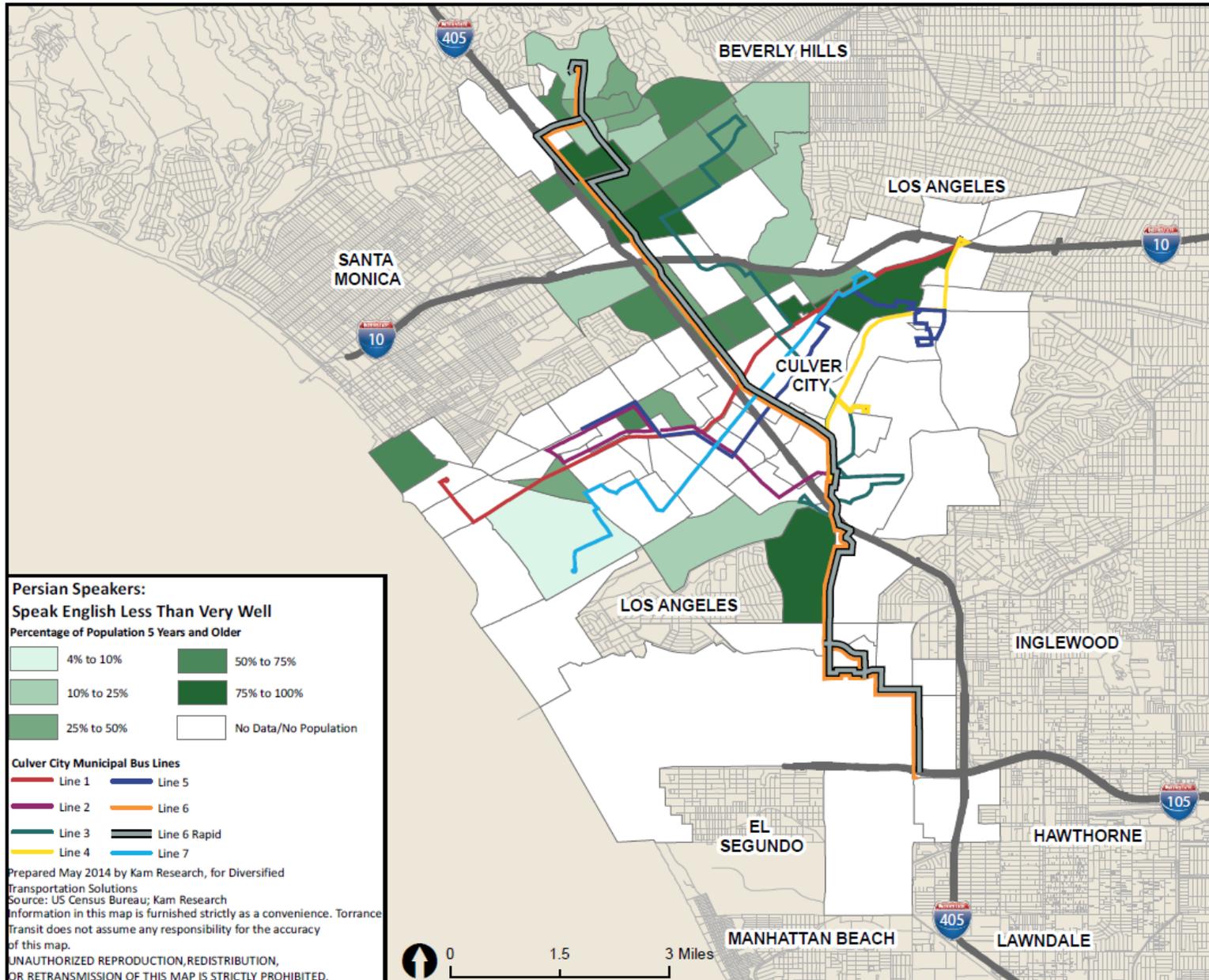


Figure 4: Percentage of Persian Language Speakers with Little or No English Proficiency by Census Tract



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

As detailed in Figures 1 through 4, 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 Westchester. Culver CityBus services in the Washington Blvd. corridor and the Sepulveda Blvd. corridor provide service to the largest geographic concentrations of LEP individuals in the Culver CityBus service area. In some areas along these corridors from 50% to 75% or more of persons speaking Spanish, Japanese 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, 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 estimates that about 15% of senior center attendees access the facility by transit, particularly regular paratransit riders. 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 routing that links the senior center, Downtown Culver City and various local activity centers. Mr. Abrego 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.

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* 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.
- 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, Vietnamese and American Sign Language, but only Spanish translation services are paid.
- 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.

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, the Spanish-speaking, Japanese-speaking and Farsi-speaking LEP language groups constitute the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided meet the safe harbor standard. Also, while persons speaking the Chinese Mandarin and Cantonese dialects and the Korean language group constitutes less than the 5% threshold (4.0%, 3.9% and 4.2%, respectively), the concentration of these language groups in the service area would suggest the inclusion of these language group for written translations of vital documents. To meet the safe harbor standard, Culver CityBus will translate vital documents such as the Title VI Report, the LEP Plan and public notices of changes to transit service into the languages listed above. Culver CityBus staff will utilize features such as *Google Translate* and multi-lingual staff from the City of Culver City to translate vital documents for eligible LEP language groups. 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 may incorporate the training video developed by the FTA on Title VI requirements into the Bus Operator Training Program. 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 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 the four-factor analysis used earlier.
- 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 two 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 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 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 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 will be included on the City of Culver City website listed below:
<http://www.culvercity.org/Government/Transportation/Bus/AboutUs.aspx>
- 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 Culver CityBus, 4343 Duquesne Avenue, Culver City, CA 90232, phone number (310) 253-6500.