



County of Los Angeles
Department of
Public Works

Aviation Division

Title VI—Civil Rights
Program Plan



County of Los Angeles
Department of Public Works
Aviation Division

Title VI – Civil Rights
Program Plan

Final—September 2016

County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803



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Section 1—Regulatory Background

1.1 Background

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

Title VI of the 1964 Civil Rights Act and associated regulations provide that no person in the United States shall, on the grounds of race, color, national origin, sex, creed or disability be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.

Pursuant to FAA requirements, the County of Los Angeles, Board of Supervisors, approved this plan on _____, 2016. The corresponding Board Letter is included in this report under **Appendix G.**

1.2 Regulatory Requirements

The Aviation Division assures that no person shall on the grounds of race, color, national origin, sex, creed or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program. As a FAA fund recipient, the Aviation Division will ensure that its programs, policies and activities comply with the Title VI Regulations of the Civil Rights Act of 1964. These regulations and other relevant requirements are discussed below.

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 and related statutes require federal agencies to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, or national origin.

Section 520 of the Airport and Airway Improvement Act of 1982

Section 520 of the Airport and Airway Improvement Act of 1982 added sex and creed to the list of race, color, or national origin as prohibited bases of discrimination with regard to nondiscrimination in the FAA's grant program.

The Civil Rights Restoration Act of 1987

The Civil Rights Restoration Act of 1987 further expanded Title VI to include all programs and activities of federal aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Executive Order 12898 – Environmental Justice

Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” was issued in 1994. This Executive Order focuses federal attention on the disproportionately high and adverse environmental and human health effects of federal actions on minority and low-income populations. The Order directs federal agencies to identify and address these effects and develop a strategy for implementing environmental justice. The Order also promotes

nondiscrimination in federal programs and the provision of public information and participation by minority and low-income populations.

Department of Transportation Order 5610.2(a)

The Department of Transportation (DOT) Order 5610.2(a) “Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” was published in 1997. This DOT Order summarizes and expands upon the requirements of Executive Order 12898 to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration, the Federal Transit Administration (FTA), the FAA, or other DOT components.

Executive Order 13166

Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency” was signed on August 11, 2000. This Executive Order requires federal agencies to examine their services and identify those that serve people with limited English proficiency (LEP). Agencies must then develop and implement a system to offer these services in a way that provides meaningful access to LEP persons.

Title 49 Code of Federal Regulations Part 21

Title 49 of the Code of Federal Regulations (CFR) Part 21 effectuates the provisions of Title VI of the Civil Rights Act of 1964 to any program or activity receiving federal financial assistance from the Department of Transportation (DOT). No person shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination on the grounds of race, color, or national origin under these programs or activities.

Title 49 Code of Federal Regulations Part 23

Title 49 CFR Part 23 includes requirements for preventing discrimination in the award and performance of any concession agreement, management contract or subcontract, purchase or lease agreement, or other agreement covered therein.

Title 49 Code of Federal Regulations Part 26

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

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

8. Providing appropriate flexibility, in creating and providing opportunities for DBEs, for those receiving federal financial assistance

The National Environmental Policy Act of 1969 (NEPA)

The National Environmental Policy Act of 1969 (NEPA) addresses both social and economic impacts of environmental justice, placing importance on providing “all Americans” with safe, healthful, and productive surroundings. The policy assures that all branches of government give prior consideration to the environment before undertaking a major federal action that significantly affects the environment. NEPA requirements are invoked for all proposed federally funded projects and activities.

The California Environmental Quality Act (CEQA)

The California Environmental Quality Act requires state and local agencies to identify and, where feasible, avoid or mitigate the significant environmental impacts of their actions. In addressing environmental justice, projects are to consider potentially significant environmental impacts on communities already burdened with pollution.

1.3 Grant Assurances

The Aviation Division, upon application for its first grant to purchase land or an airport or noise implementation project involving construction, executed the complete standard DOT Title VI assurances.

In subsequent grants the Aviation Division includes the following for all FAA-assisted contracts to comply with the Civil Rights Grant Assurance:

“The Consultant hereby assures that it will comply with Subchapter VI of the Civil Rights Act of 1964, 42 USC Sections 2000 (e) (1) through 2000 (e) (17), to the end that no person shall, on the grounds of race, creed, color, sex, religion, ancestry, age, condition of physical disability, marital status, political affiliation, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under this Contract or under any project, program, or activity supported by this Contract. The Consultant shall comply with Consultant’s EEO Certification.”*

*EEO = Equal Employment Opportunity.

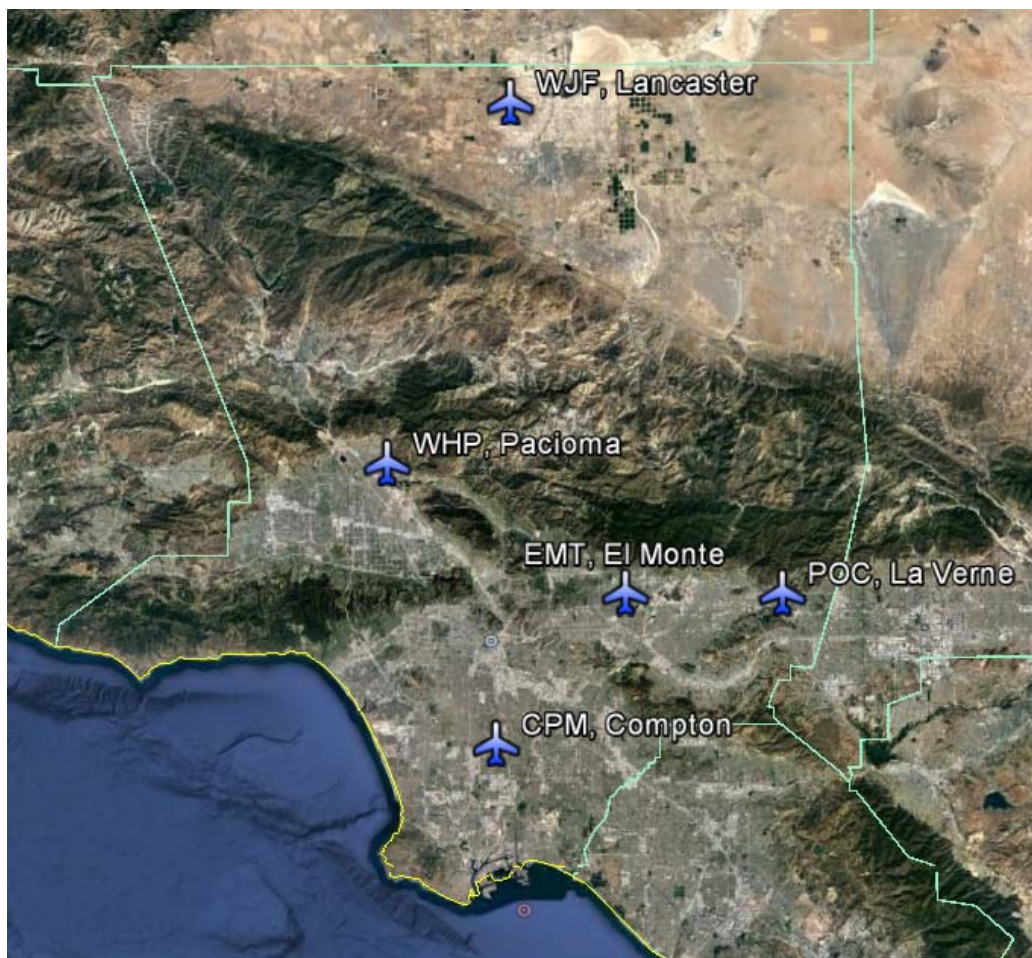
Section 2—County Airports and Demographics

2.1 Los Angeles County Department of Public Works Aviation Division

The Aviation Division owns five General Aviation (GA) airports throughout the County. The County-owned airports are part of the FAA's National Plan of Integrated Airports System (NPIAS). The Aviation Division is responsible for the planning, development, and administration of the five airports, while the operation and maintenance of the airports has been contracted to American Airports Corporation (AAC) since 1991. This system of airports includes Brackett Field Airport (POC), Compton/Woodley Airport (CPM), San Gabriel Valley Airport (EMT), General William J. Fox Airfield (WJF), and Whiteman Airport (WHP). The Aviation Division Title VI Coordinators include the Aviation Division Chief (primary) and Assistance Chief (secondary). As a division of the Los Angeles County Department of Public Works, the Aviation Division Title VI Coordinator defers the handling of complaints to the Public Works Title VI Coordinator. See Section 3.2 for additional information.

Figure 2-1 depicts the locations of the five airports within Los Angeles County (outlined).

Figure 2-1 Airport Locations



2.2 Community Benefits and Services

The County-owned airports provide a number of beneficial resources to the local community. In addition to acting as a job source and providing local economic investment from the airports, tenants, and visitors, the following benefits are available at or through the facilities (listed on the Aviation Division's website at <http://dpw.lacounty.gov/avi/airports/default.aspx>).

Law Enforcement – The County-owned airports facilitate the activities of the various City and County Police, U.S. Drug Enforcement Agency, U.S. Marshals, Department of Homeland Security, and various other law enforcement agencies.

Fire Fighting – The County-owned airports serve as a base of operations for local firefighting efforts by the U.S. Forest Service, California Department of Forestry and Fire Protection, and other agencies. The U.S. Forest Service has a permanent year-round base of operations at General William J. Fox Airfield and is extremely busy during fire season.

Medical Services – The County-owned airports are frequently used for air ambulance and medevac activities involving the transport of persons, medical equipment, blood, organs or other urgent medical related materials and supplies.

Emergency Operations – The County-owned airports are used to accommodate transportation and facility needs during an emergency or disaster.

News, Weather and Traffic Reporting – The County-owned airports are home base to numerous helicopters and fixed-wing aircraft flying and reporting daily for television and radio.

Youth Programs – The County-owned airports are home to numerous youth programs providing free orientation flights, low-cost flight training, educational and community service opportunities, field trips and many other aviation-oriented activities.

Community Events & Activities – The County-owned airports host various events throughout each year that are open to the general public. Events include static aircraft displays, fly-ins, air races, air shows and others. Additionally, numerous tours of the airport facilities are provided each year to local schools and youth organizations such as the Boy Scouts and Girl Scouts.

The following public services and facilities are also provided at specific airports:

Brackett Field Airport:

- Shaded grassy area with benches, a play area, and more open to the general public with 24/7 parking
- Public restrooms and a public telephone available in the Airport Terminal Building
- Dining at Norm's Hangar Restaurant; (909) 596-6675
- Flight Training, Aircraft Rentals, and Aerial Sightseeing Tours
 - Global Aviators Academy; (909) 596-1900
 - Universal Air Academy; (909) 596-9284

Compton/Woodley Airport:

- Viewing deck open to the general public with 24/7 parking
- Public restrooms and a public telephone available in the Airport Terminal Building
- Airport tours may be coordinated with airport management at (310) 631-8140

- Flight Training, Aircraft Rental, Aerial Sightseeing Tours, and Museum
- Tomorrow's Aeronautical Museum; (310) 618-1155
- Banner Towing
- Van Wagner; (360) 376-8585

San Gabriel Valley Airport:

- Patio area open to the general public with 24/7 parking
- Public restrooms available in the Airport Terminal Building
- Dining at Annia's Kitchen; (626) 401-2422
- Airport Tours may be coordinated with airport management at (626) 448-6129
- Flight Training, Aircraft Rental, and Aircraft Sightseeing Tours
- Universal Air Academy; (626) 454-5254
- Aircraft Charter

General William J. Fox Airfield:

- Viewing area open to the general public with 24/7 parking
- Public restrooms available in the Airport Terminal Building
- Dining at Foxy's Landing Café; (661) 949-2284
- Airport Tours may be coordinated with airport management at (661) 940-1709
- Flight Training, Aircraft Rental, and Aerial Sightseeing Tours
- Barnes Aviation; (661) 948-4048

Whiteman Airport:

- Patio area open to the general public with 24/7 parking
- Airport Tours may be coordinated with airport management at (818) 896-5271
- Flight Training and Aircraft Rental
- Vista Air; (818) 896-5224
- Aerial Sightseeing Tours
- Adventure Helicopter Tours; (818) 612-3676
- Blu Ventures Helicopter Tours; (818) 355-2333

The majority of the above are facilitated by tenants of the airports and not the Aviation Division itself. The Aviation Division does, however, provide public facilities and benefits such as patio areas, viewing decks, etc., at each of the airports.

2.3 Demographics

As GA facilities, the County-owned airports primarily serve Los Angeles County. The County's demographics were analyzed to determine the needs of the region. In order to analyze the criteria covered under Title VI and other relevant requirements (race, color, national origin, sex, creed and disability) several factors were assessed:

- Race
- Language
- Income¹

¹ Although not one of the discrimination factors income is relevant to environmental justice and can also be indicative of minority populations.

- Sex
- Disability
- Age²

There was limited information available on religion, which was therefore omitted from the demographics assessment.

Data was collected from the U.S. Census Bureau in order to assess these factors. Statistics provided by Woods and Poole, Inc., were also considered for analysis but were determined less current than the Census Bureau information. For comparison purposes and in order to understand the specific needs of Los Angeles County, information was also collected for the State of California and the United States. **Table 2-1** and **Figure 2-2** provide a comparison of population percentages by race.

Table 2-1—Percent Population by Race (2015)

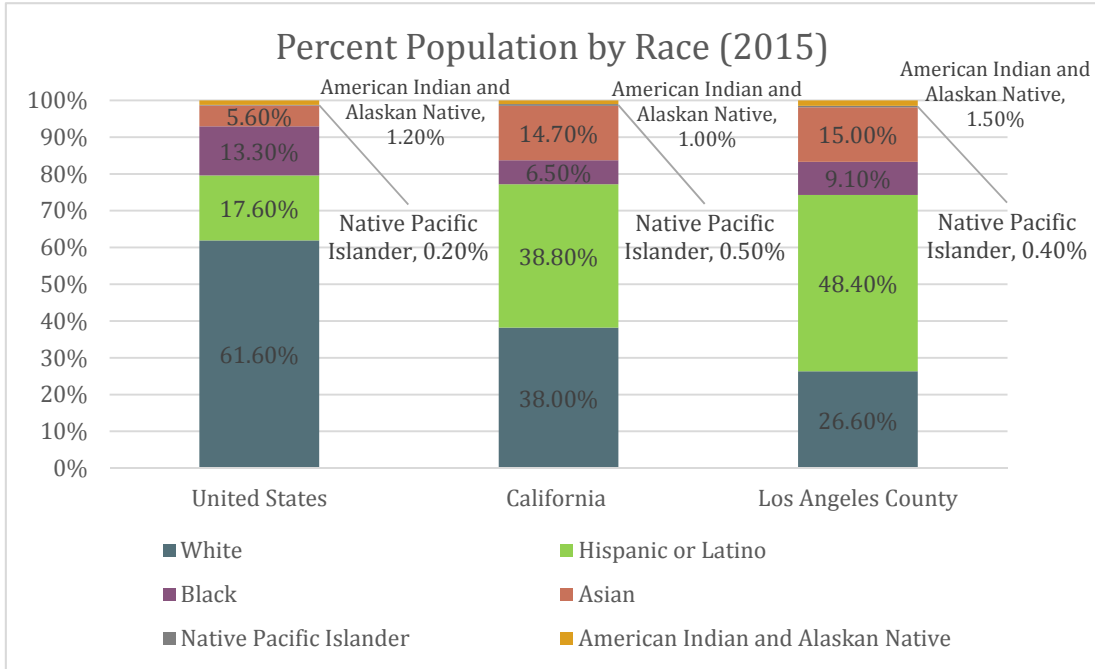
Race	United States	California	Los Angeles County
White alone, non-Hispanic or Latino	61.6%	38.0%	26.6%
Hispanic or Latino	17.6%	38.8%	48.4%
Black	13.3%	6.5%	9.1%
Asian alone	5.6%	14.7%	15.0%
American Indian and Alaskan Native	1.2%	1.0%	1.5%
Native Pacific Islander	0.2%	0.5%	0.4%
Two or more races	2.6%	3.8%	3.0%

Source: United States Census Bureau QuickFacts, 2015

Note: Due to rounding these may not add to 100% (“Two or More Races” should be excluded from this calculation).

² Although not required this information was documented for consistency with the Transit Operations Title VI Plan.

Figure 2-2—Percent Population by Race (2015)

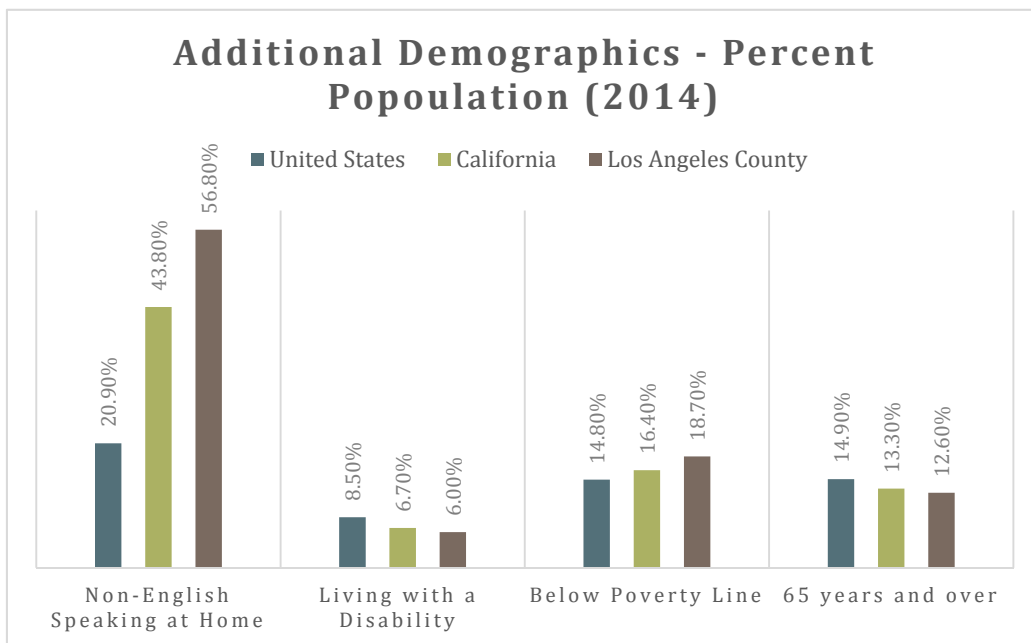


Source: U.S. Census Bureau, 2015

Comparatively, Los Angeles County has a more diverse population distribution than either California or the United States as a whole. Los Angeles County’s primary population is of Hispanic or Latino descent, as opposed to White. Los Angeles County also exhibits a higher percent population of Asians when compared to California (slightly) and the nation (significantly).

Language, disability, poverty, and age characteristics for the U.S., California, and Los Angeles County are summarized on **Figure 2-3**.

Figure 2-3—Additional Demographics

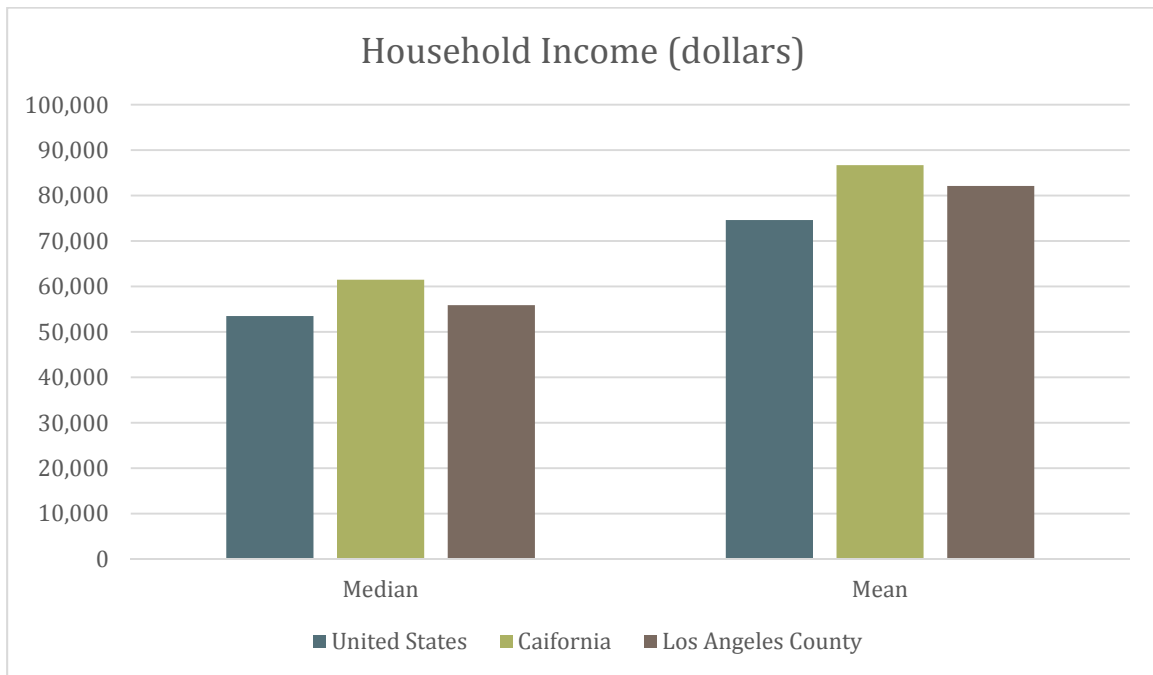


Source: U.S. Census Bureau, 2014

The collected information shows that Los Angeles County exhibits a significantly higher percent population of persons that are non-English speaking at home. This factor is specifically addressed in **Appendix E**, the Limited English Proficiency Plan, which includes a breakdown of the most highly spoken languages in the County.

The national poverty guidelines used by the U.S. Census Bureau are issued by the Department of Health and Human Services (<http://aspe.hhs.gov/poverty/poverty.shtml>). The poverty line guidelines vary based on family size and increase each year due to the Consumer Price Index (<http://www.bls.gov/news.release/cpi.toc.htm>). As shown on **Figure 2-3**, the percent population of persons living below the poverty line in Los Angeles County is higher in comparison to the state and national percentages. A more in-depth analysis of the income of households in Los Angeles County is provided below on **Figure 2-4**.

Figure 2-4— Mean and Median Household Income (2014)

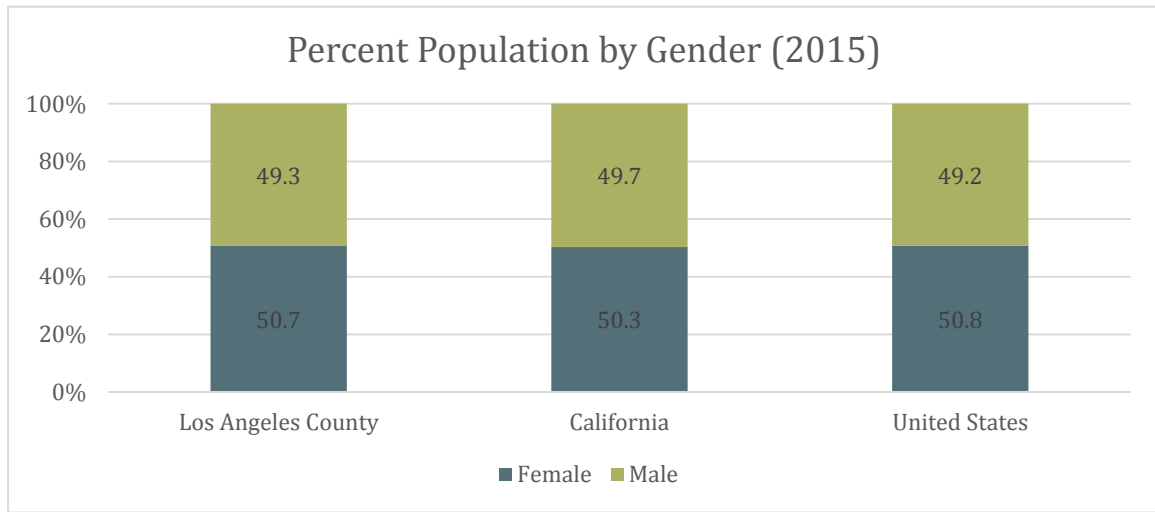


Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates

This information presented on **Figure 2-3** also indicates that the County has lower relative percent populations of persons 65 years and over and persons living with a disability. These lower relative percentages do not, however, disqualify the characteristics from being considered important factors in providing equal meaningful access to the services of the Aviation Division.

Figure 2-5 shows the gender breakdown of Los Angeles County, California, and the U.S. These percentages are comparatively similar with a marginally higher percentage of women, 50.3% to 50.8%, in each region.

Figure 2-5—Percent Population by Gender (2015)



Source: U.S. Census Bureau, 2015

Section 3—General Reporting and Requirements

The Aviation Division has developed a wide range of procedures to meet the general reporting requirements of Title VI including those for providing Title VI notifications, filing Title VI discrimination complaints, training staff on Title VI procedure, providing access to LEP populations, providing information and outreach to ensure public involvement, addressing comprehensive public transportation access, providing opportunities to minority businesses, meeting environmental justice regulations, adhering to service standards, and monitoring Title VI policies and procedures.

3.1 Policy

It is the Aviation Division’s policy to assure full compliance with Title VI of the Civil Rights Act of 1964, as amended, and that no person in the United States of America shall, on the grounds of race, color, national origin, sex, creed, or disability be excluded from the participation in, be denied the benefits of or be otherwise subjected to discrimination under any of the Aviation Division’s programs, activities or services.

The Aviation Division will display this policy including information on complaint procedures and signage about Title 49 CFR Part 21 in the lobby of the Aviation Division’s headquarters in Alhambra, on the Aviation Division website at <http://dpw.lacounty.gov/avi/airports/>, and in the main public area of each airport.

Samples of the Aviation Division’s Notice to the Public is provided in **Appendix A** and a sample of the Title 49 CFR Part 21 signage is provided in **Appendix B**.

3.2 Complaint Procedure and Form

These procedures cover complaints filed under Title VI of the Civil Rights Act of 1964. They cover any program, activity or service administered by the Aviation Division.

Any person who feels that he or she has been subjected to discrimination on the basis of race, color, national origin, sex, creed, or disability has the right to file a Title VI complaint. The law prohibits intimidation or retaliation of any kind.

A Complaint Form (**Appendix C**) can be used to file a Title VI complaint. This form can be obtained from the following resources:

1. County of Los Angeles Department of Public Works’ website:
<http://dpw.lacounty.gov/general/civilRights/Title%20VI%20Complaint%20Form.pdf>
2. By calling the Aviation Division at (626) 300-4602, and requesting a complaint form to be mailed.
3. By picking up a complaint form from the Aviation Division offices at 900 South Fremont Avenue, Alhambra, CA 91803.

Complaints must be filed within 180 days of the alleged discriminatory event or practice. Complaints must be filed in writing to the Public Works Title VI Coordinator, or to the Aviation Division Title VI Coordinator (which will then be immediately forwarded to the Public Works Title VI Coordinator). For the most direct transmission, complaints should be mailed to the following address:

County of Los Angeles Department of Public Works

Administrative Services Division – Title VI Coordinator

900 S. Fremont Avenue, 9th Floor

Alhambra, CA 91803

Complainants may also file a Title VI complaint with an external entity such as the FAA’s Office of Civil Rights. Complaints being filed directly to the FAA must be filed in writing, within 180 days of the alleged act of discrimination, to the FAA Office of Civil Rights:

Federal Aviation Administration

Office of Civil Rights, ACR-1

800 Independence Avenue, S.W.

Washington, DC 20591

Should a complaint be filed with the County (either directly to the Public Works Title VI Coordinator or to the Aviation Division Title VI Coordinator and then forwarded on) and an external entity simultaneously, the external complaint will supersede the complaint filed with the County and the County’s complaint procedures will be suspended pending the external entity’s findings. Every effort will be made to obtain a timely resolution of complaints.

The following procedures will be followed to investigate formal Title VI complaints:

1. The complaint must meet the following requirements:
 - a. Submitted in writing and signed by the complainant(s). In cases where complainant is unable or incapable of providing written statement, a verbal complaint may be made. The investigator assigned to the case will interview the complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
 - b. Includes the date of the alleged act of discrimination, date when the complainant became aware of the alleged discrimination, date on which the conduct was discontinued, or the latest instance of conduct.
 - c. Presents a detailed description of the issues including names and job titles of those individuals perceived as parties in the complaint.
 - d. Filed within 180 calendar days of the alleged incident per federal and state law.
2. As required by Title 49 CFR Part 21, a copy of any written complaint based on race, color, national origin, sex, creed, or disability will be forwarded to the FAA within 15 business days of receiving the complaint. The copy of the complaint will be accompanied by a statement describing the measures taken to resolve the matter, and the results of these actions. The Public Works Title VI Coordinator will also notify the complainant of their right to file a complaint directly to the FAA.
3. Within 14 business days of receiving the complaint, the Public Works Title VI Coordinator will determine its jurisdiction, sufficiency, and need for additional information, and investigate the merit of the complaint. The complainant will receive an acknowledgement letter informing him/her whether the Public Works Title VI Coordinator has accepted or rejected the complaint.

4. Once the Public Works Title VI Coordinator approves the complaint for investigation, the complainant will receive a complaint number and the complaint will be logged in a database identifying the complainant's name; factual allegations; and the alleged harm against race, color, national origin, sex, creed, or disability.
5. If more information is needed to evaluate the claim, the Public Works Title VI Coordinator may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Public Works Title VI Coordinator. If the Public Works Title VI Coordinator is not contacted by the complainant or does not receive additional information within 10 business days, he or she may terminate the investigation and close the complaint.
6. In cases where the Public Works Title VI Coordinator investigates the complaint, within 90 calendar days of the complaint, the investigator will issue either: 1) a closure letter or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the complaint will be closed. A LOF summarizes the allegations, and informs the complainant that the Public Works Title VI Coordinator found the complaint to have merit and it will take appropriate corrective action to remedy the matter.
7. If the complainant is unsatisfied with the decision, he/she may file an appeal with the FAA.
8. The Public Works Title VI Coordinator will maintain a list of Title VI complaints regarding the Aviation Division in this report under **Appendix F**. Since the Public Works Title VI Coordinator has not received any complaints regarding the Aviation Division at the time this Plan was prepared (September 2016), **Appendix F** is intentionally left blank.

3.3 Training

The following training is to be provided to the Aviation Division, its contactors and tenants.

1. Review of the Aviation Division Title VI Policy and Limited English Proficiency (LEP) Plan.
2. Review of language assistance services offered to the public.
3. Review of how to document language assistance requests.
4. Review of how to handle a potential complaint.

3.4 Public Participation Plan

In accordance with the current guidelines relative to Title VI, the Aviation Division has prepared a Public Participation Plan (**Appendix D**) to promote public involvement in airport planning and decision-making activities. The proposed plan will establish procedures for public participation related to the County-owned airports.

3.5 Limited English Proficiency Plan

The LEP plan (**Appendix E**) has been prepared to address the Aviation Division's 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 and associated regulations, which state that no person shall be subjected to discrimination on the basis of race, color, national origin, sex, creed, or disability.

3.6 Minority Business Notification and Non-Discrimination

The Los Angeles County Board of Supervisors established the Community Business Enterprise (CBE) Program to support their policy that “minority, women, disadvantaged and disabled veteran business enterprises be afforded the maximum opportunity to participate in the County’s contracting and procurement programs.” Certified minority (MBE), women (WBE), disadvantaged (DBE), and/or disabled veteran (DVBE) business enterprises are eligible for the CBE Program. Furthermore, the program specifies that “the bidder/proposer is selected without regard to race, creed, color, or gender.”

Enterprises can become CBE certified, which provides a number of benefits including networking opportunities, inclusion in the County’s CBE listing, and access to a range of programs and services. Recognized DBE and DVBE participants are ensured notification of opportunities for participation in federal programs that require DBE/DVBE participation. More information on the program and application can be found at http://osb.lacounty.gov/pdfs/CBE_Program_Application.pdf

NOTE: *The County’s CBE program is in addition to the Disadvantaged Business Enterprise Program described in Title 49 CFR Part 26. All FAA funding recipients, regardless of funding levels, must meet the notification and award requirements of Title 49 CFR Part 21 Appendix C(a)(1)(x), which states: “The sponsor shall assure that the minority business community in his area is advised of the opportunities offered by airport concessions, and that bids are solicited from such qualified minority firms, and awards made without regard to race, color, or national origin.”*

The Aviation Division will include the following assurances in all concession agreements and management contracts:

- (1) “This agreement is subject to the requirements of the U.S. Department of Transportation's regulations, Title 49 CFR Part 23. The concessionaire or contractor agrees that it will not discriminate against any business owner because of the owner's race, color, national origin, or sex in connection with the award or performance of any concession agreement, management contract, or subcontract, purchase or lease agreement, or other agreement covered by Title 49 CFR Part 23.
- (2) “The concessionaire or contractor agrees to include the above statements in any subsequent concession agreement or contract covered by Title 49 CFR Part 23, that it enters and cause those businesses to similarly include the statements in further agreements.”

To comply with Title 49 CFR Part 26, the Aviation Division has an established DBE program for federally funded projects and includes the following in contractor agreements:

“Disadvantaged Business Enterprise Program – The engineer [or other service-provider] will update the airport Disadvantaged Business Enterprise (DBE) program in accordance with 49 CFR Part 26, *Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs*. The engineer will review the methodology for evaluating the availability of DBE businesses to provide services and products for airport projects in the Federal fiscal year 20XX. The engineer will review the airport’s service area by analyzing the utilization of DBE businesses on previous airport projects. The engineer will prepare a legal advertisement describing the revised DBE utilization goal and methodology. The engineer will deliver the advertisement to the owner to publish in one (1) newspaper as a public notice to provide a thirty day public comment period. The engineer will submit the revised DBE program to the FAA Office of Civil Rights review and comments. The engineer will prepare the DBE program annual

update on Form 4XXX at the conclusion of Federal fiscal year 20XX to reflect the actual DBE utilization on airport projects.”

3.7 Transportation

Public transportation is available to four of the five County-owned airports through the Los Angeles County Metropolitan Transportation Authority. There are a number of bus routes that serve Whiteman Airport, San Gabriel Valley Airport, Brackett Field Airport, and Compton/Woodley Airport. Due to the isolated location of General William J. Fox Airfield there is not currently a fixed route. However, dial-a-ride options are available in that area for the elderly or disabled.

3.8 System-Wide Service Standards

It is the policy of the Aviation Division to provide quality service to all constituents regardless of race, color, national origin, sex, creed, or disability. In addition, the Aviation Division is committed to providing its patrons with clean and safe waiting areas. Through their contract with AAC the Aviation Division ensures timely and satisfactory maintenance and custodial services of the airports.

3.9 Environmental Justice

In 1994, President Clinton issued Executive Order (EO) 12898, titled *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. EO 12898 emphasized a federal agency's responsibility to make environmental justice a goal by identifying and addressing the effects of programs, policies and activities on minority and low-income populations. The Aviation Division intends to accomplish this by analyzing demographic data and involving the public in the planning and development process of transportation projects to get a better understanding of a project's benefits and environmental impact. The public's input and data analysis will enable the Aviation Division to develop measures to mitigate any potential disproportionately high or adverse effects on minority and low-income populations. In addition, the Aviation Division is subject to the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). These Acts require consideration of potential environmental justice impacts associated with proposed projects that are covered under each regulation. In order to do so, the Aviation Division prepares environmental analyses to determine potential impacts and avoid/mitigate them when necessary.

3.10 Monitoring

The Aviation Division Title VI Coordinator will provide oversight of the entire Title VI Program with support from the Public Works Title VI Coordinator. This includes ensuring training is conducted, language translation services continue to be available (see Language Assistance Measures in **Appendix E**), and appropriate Title VI signage is posted. This also includes updating community statistics, and corresponding with the FAA as necessary. As previously noted, the Public Works Title VI Coordinator will be responsible for handling Title VI complaints.

The Title VI Plan shall be reviewed and updated as necessary every three years.



Appendices

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Appendix A

Notice to the Public



County of Los Angeles Department of Public Works
Aviation Division

**Title VI Nondiscrimination
Statement**

The County of Los Angeles Department of Public Works, Aviation Division, ensures compliance with Title VI of the Civil Rights Act of 1964, as amended, to the end that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, national origin, sex, creed, or disability.

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

County of Los Angeles Department of Public Works
Administrative Services Division – Title VI Coordinator

900 S. Fremont Avenue, 9th Floor

Alhambra, CA 91803

Telephone (626) 458-4078


For the California Relay Service dial 7-1-1

*Complaints may also be made directly to the Federal Aviation Administration

Appendix B

Title 49 CFR Part 21 Signage






Unlawful Discrimination

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or handicap in public services and employment opportunities. Allegations of discrimination should be promptly reported to the Airport Manager or:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, SW.
Washington, D.C. 20591

Federal regulations on unlawful discrimination are available for review in the Airport Manager's Office.



Discriminacion Ilegal

Se prohíbe a los empresarios de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, origen nacional, sexo, creencias religiosas o impedimentos, en lo que respecta a servicios públicos y oportunidades de empleo. Las alegaciones de discriminación deberán dirigirse inmediatamente al Administrador del Aeropuerto o a:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, SW.
Washington, D.C. 20591

Los reglamentos sobre discriminación ilegal están a la disposición de los interesados para su examen en la oficina del Administrador del Aeropuerto.

Appendix C

Formal Complaint Form



County of Los Angeles Department of Public Works

TITLE VI – CIVIL RIGHTS COMPLAINT FORM

The County of Los Angeles Department of Public Works is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, national origin, sex, age, disability, religion, sexual orientation, or gender identity, as provided by Title VI of the Civil Rights Act of 1964, as amended and other nondiscrimination laws and authorities. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact us by calling (626) 458-4078.

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

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

Race___ Religion___ Sex___ Color___ Gender Identity___

Age___ National Origin ___ Disability___ Sexual Orientation___

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



County of Los Angeles Department of Public Works
TITLE VI – CIVIL RIGHTS COMPLAINT FORM

Have you filed a complaint with any other federal, state, or local agencies? Yes / No

(Circle one)

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

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

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

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

I affirm that I have read/written the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature

Complainant's Name (Print)

Date

Please mail this form to:

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



Appendix D

Public Participation Plan



PUBLIC PARTICIPATION PLAN

As a recipient of funds through the Federal Aviation Administration (FAA), the County of Los Angeles Department of Public Works (Public Works) Aviation Division (Aviation Division) is required to adhere to the Title VI of the Civil Rights Act of 1964 and to integrate the Public Participation Plan into its Title VI Program. This plan provides guidelines for involving the public to ensure that all groups are represented and their needs considered. The Aviation Division is committed to ensuring it serves Los Angeles County fairly, consistently and in the most cost-efficient and appropriate manner within available resources.

Goals and Objectives

The goal of the Aviation Division Public Participation Plan is to offer a variety of opportunities for the general public to engage in airport planning and decision-making activities. The objectives are:

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

Identification of Stakeholders

Stakeholders are those individuals who are either directly or indirectly affected by a plan, project, or program based on decisions related to recommendations or implementation actions. Those individuals who may be adversely affected or who may be denied the benefit of a plan's recommendations are of particular interest in the identification of specific stakeholders.

Minority Populations

The following presents the breakdown of populations in the U.S., California and Los Angeles County.



Table D-1—Percent Population by Race (2015)

Race	United States	California	Los Angeles County
White alone, non-Hispanic or Latino	61.6%	38.0%	26.6%
Hispanic or Latino	17.6%	38.8%	48.4%
Black	13.3%	6.5%	9.1%
Asian alone	5.6%	14.7%	15.0%
America Indian and Alaskan Native	1.2%	1.0%	1.5%
Native Pacific Islander	0.2%	0.5%	0.4%
Two or more races	2.6%	3.8%	3.0%

Source: United States Census Bureau QuickFacts, 2015

Note: Due to rounding these may not add to 100% (“Two or More Races” should be excluded from this calculation).

Persons considered to be minorities are identified by the U.S. Census Bureau as people of African, Hispanic, Asian, American Indian, or Alaskan native origin (U.S. Census, STF301/Tb1008 and Tb1011; 1990). Executive Order 12898 and the Department of Transportation (DOT) Orders on Environmental Justice consider minority persons belonging to any of the following groups:

- Black – a person having origins in any of the black racial groups of Africa.
- Hispanic – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- Asian American – a person having origins in the Far East, Southeast Asia, or the Indian subcontinent.
- American Indian and Alaskan Native – a person having origins in North America and who maintains cultural identification through tribal affiliation or community recognition.

The minority categories comprise almost half of the percentage of the population in Los Angeles County. Hispanic/Latino individuals are the largest minority, with 48.4 percent of the total population.

Limited English Proficiency Populations

Reasonable efforts will be made to engage LEP populations utilizing techniques such as the development of public notices in appropriate non-English languages that will provide information as to where individuals can obtain free language assistance.

Low-Income Populations

Persons are considered low income when their household income (or in the case of a community or group, whose median household income) “is at or below the U.S. Department of Health and Human services poverty guidelines.”

The Aviation Division will identify low-income populations within the service area. Low-income populations in the County will be given reasonable opportunity to provide input on plans and programs to avoid disproportionate harm or lack of benefit.



Public Comment Process

Regular meetings of the Los Angeles County Aviation Commission are held on a monthly basis. The regular meetings are primarily for the purpose of discussing operations and development matters of the airport system. The meetings provide an opportunity for the public to learn about the projects and activities occurring at the airports as well as express comments.

The following procedures, strategies, techniques, and media will be utilized to engage and notify the public about these meetings:

- Place information on the website
- Utilize social media outlets, e.g., Twitter
- Engage in outreach efforts at community meetings and through community groups at varied times and locations

In addition to the regular Aviation Commission meetings, major projects that require National Environmental Policy Act (NEPA) and/or California Environmental Quality Act (CEQA) compliance often involve a public outreach and engagement program that is tailored to the project and potential impacts. The associated efforts may include LEP outreach initiatives.



Appendix E

Limited English Proficiency Plan



LIMITED ENGLISH PROFICIENCY PLAN

Introduction

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

Title VI of the Civil Rights Act of 1964 and associated regulations provide that no person in the United States shall, on the grounds of race, color, national origin, sex, creed, or disability be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (Title 23 CFR Part 200 and Title 49 CFR Part 21).

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or comprehend English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This Order applies to all state and local agencies that receive federal funds, including the Aviation Division.

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

Limited English Proficiency Plan Summary

The Aviation Division has developed this LEP Plan to help identify reasonable steps for providing language assistance to LEP persons who wish to access services provided by the Aviation Division.

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

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

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



assistance.

A summary of the results of the Aviation Division four factor analysis is in the following section.

Four-Factor Analysis

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

For assessment purposes, data was obtained from the U.S. Census Bureau, American Community Survey, Table B16001. The United States, California, and Los Angeles County were each analyzed for comparison. The Census data helps identify language barriers and diversity for each. **Table E-1** below shows the top five primary languages spoken in each region. (The number of English-speaking individuals represents those who only speak English. The other languages include individuals who do not speak English “very well,” implying that language assistance is likely necessary.)

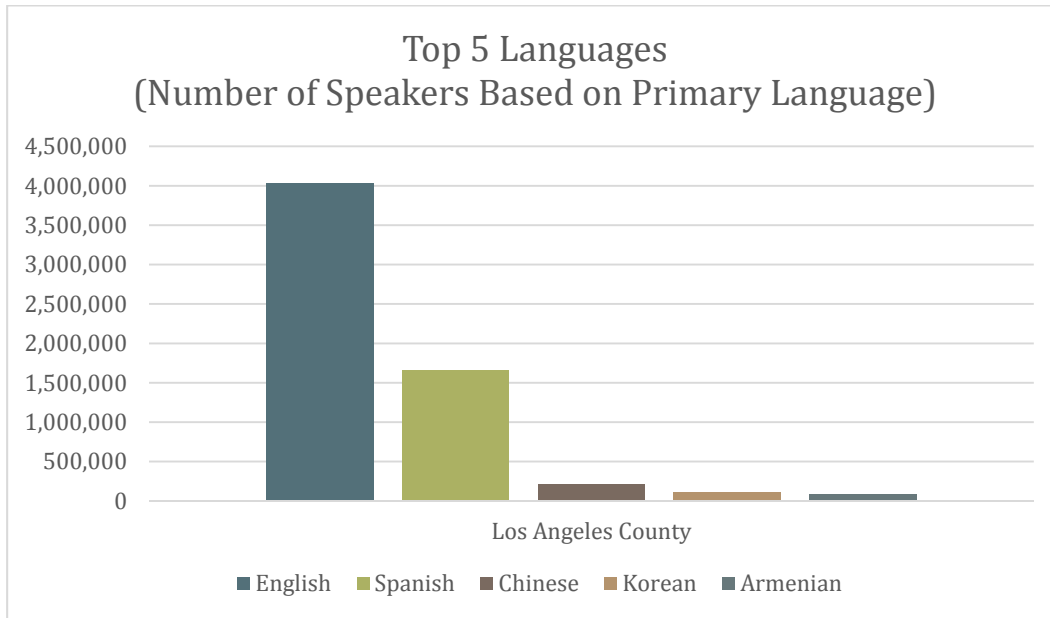
Table E-1—Top 5 Languages

Population	Top 5 Primary Languages				
	1	2	3	4	5
United States	English 232,724,203	Spanish 16,346,401	Chinese 1,659,508	Vietnamese 850,087	Korean 620,149
California	English 19,992,432	Spanish 4,490,408	Chinese 610,934	Vietnamese 316,886	Tagalog 260,443
Los Angeles County	English 4,032,116	Spanish 1,656,302	Chinese 212,843	Korean 112,411	Armenian 86,432

Source: 2014 American Community Survey 5-year Estimates, U. S. Census Bureau, Table B16001



Figure E-2—Top 5 Languages



Source: 2014 American Community Survey 5-year Estimates, U. S. Census Bureau, Table B16001

English, Spanish, and Chinese, are the top three languages (in that order) spoken in each area analyzed. The fourth and fifth highest ranked languages are Vietnamese followed by Tagalog for both the United States and California; however, in Los Angeles County these are substituted by Korean and Armenian.

2. The frequency with which LEP persons come in contact with the Aviation Division programs, activities or services.

The Aviation Division is a local workforce employer and provides a number of public benefits and services at the airports. However, as General Aviation (GA) facilities the airports offer unique opportunities to the public. As such, they are likely to provide services to LEP populations on a semi-regular basis.

3. The nature and importance of services provided by the Aviation Division to the LEP population.

The Aviation Division provides a number of public benefits and services, and acts as an important employment source for the local communities.

4. The resources available to the Aviation Division to provide LEP assistance.

As a division within Public Works, staff is available to assist customers in Armenian, Chinese, and Spanish. In addition, Public Works prints brochures and other documents in English and Spanish as needed.

Based on the four-factor analysis, the Aviation Division has developed its LEP Plan as outlined in the following section.



Limited English Proficiency Plan (LEP Plan) Outline

The Aviation Division may coordinate with American Airports Corporation (AAC), the third party responsible for maintenance and operation of the airports, and/or 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 or meetings. The Aviation Division will modify outreach strategies based on information gathered.

Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which the Aviation Division responds to LEP persons, whether in person, by telephone, or in writing including:

1. Public Works has bilingual staff who can assist when needed.
2. The California Relay Service is available to all residents and provides a phone number (dial 7-1-1) for LEP or hearing impaired individuals to receive communication assistance.
3. During National Environmental Policy Act (NEPA) and/or California Environmental Quality Act (CEQA) planning efforts the Aviation Division considers the need for LEP public outreach and tailors the strategy accordingly.
4. Pending a review of recorded requests, the Aviation Division may print "Airports at a Glance" information brochures in non-English languages on the Aviation Division website.
5. Pending a review of recorded requests, the Aviation Division may provide meeting notes for the monthly Los Angeles County Aviation Commission meetings in non-English languages on the Aviation Division website.

Staff Training

The following training is provided to the Aviation Division, its contactors and tenants.

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

Outreach Techniques

Pending a review of recorded requests, the Aviation Division may post signage in points of entry for each airport stating the availability of free language assistance.

When staff prepare a document or schedule a meeting, for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers and agendas will be printed in English and Spanish based on the known LEP population of Los Angeles County.



Monitoring and Updating the LEP Plan

The Aviation Division will update the LEP Plan as required by the DOT. At minimum, the review and update of the LEP plan will occur every three years or when it is clear that higher concentrations of LEP individuals are present in the County.

Dissemination of the Aviation Division's Title VI Policy and Limited English Proficiency Plan

The Aviation Division website will include the Title VI Policy, complaint form, and Limited English Proficiency Plan at <http://dpw.lacounty.gov/avi/airports/>. Any person or agency with internet access will be able to access and download the documents from the Aviation Division website. A copy of the documents may be requested by any person or agency via telephone, fax, mail, email or in person and a copy of the documents shall be provided at no cost.

Questions or comments regarding the Aviation Division Title VI Policy and Limited English Proficiency Plan may be submitted to:

County of Los Angeles Department of Public Works
Aviation Division
900 South Premont Avenue
Alhambra, CA 91802 - 1460
Phone: (626)300-4602



Appendix F

List of Title VI Investigations, Complaints or Lawsuits

County of Los Angeles DPW Aviation Division
Title VI – Civil Rights Program Plan



List of Title VI Investigations, Complaints or Lawsuits

As of September 2016, the Aviation Division has not been involved in any Title VI investigations, complaints or lawsuits.

Appendix G

County of Los Angeles Board Letter and Resolution



County of Los Angeles Department of Public Works
Aviation Division Title VI Plan



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