

# CITY OF CALABASAS CALABASAS TRANSIT SYSTEM 2022 Title VI Program

**\*Draft Final\* Report**

**Developed July 2022**

Adopted by the City of Calabasas City Council  
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Calabasas Transit System is a public transit program which serves residents and visitors within the city limits of Calabasas, in Los Angeles County, California.

This document was prepared by Moore & Associates, Inc., on behalf of the City of Calabasas. It has been adopted by the City of Calabasas City Council to comply with Title VI of the Civil Rights Act of 1964, including recent provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients."

# TABLE OF CONTENTS

1. Title VI Notice to the Public and Locations Where Displayed .....	01
2. Title VI Complaint Procedures and Form .....	03
3. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits .....	07
4. Public Participation Plan .....	09
5. Summary of Outreach Efforts .....	13
6. Language Assistance Plan .....	15
a. Four-Factor Analysis .....	16
7. Membership of Non-Elected Committees and Councils .....	37
8. Fixed-Route Service Standards and Policies .....	39
9. Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions .....	43
10. Title VI Equity Analysis.....	45
11. City Council Adoption of Title VI Program .....	47
 <b>Appendix</b>	
Survey Instruments .....	49

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# Table of Exhibits

Exhibit 1.1	Calabasas Transit System Title VI Notice to the Public.....	01
Exhibit 1.2	List of Locations Where Title VI Notice Is Posted.....	02
Exhibit 2.1	Title VI Complaint Form.....	05
Exhibit 3.1	Title VI Investigations, Lawsuits, and Complaints Summary Table.....	07
Exhibit 6.1	Calabasas Transit System Fleet Inventory.....	16
Exhibit 6.2	Racial Breakdown of Total Population of Service Area.....	17
Exhibit 6.3	Languages Spoken at Home By Community.....	19
Exhibit 6.4	Total Population by Census Block Group.....	20
Exhibit 6.5	Asian Population by Census Block Group.....	21
Exhibit 6.6	Hispanic or Latino Population by Census Block Group.....	22
Exhibit 6.7	LEP Population by Census Block Group.....	23
Exhibit 6.8	Farsi/Persian-Speaking Population by Census Block Group.....	24
Exhibit 6.9	Spanish-Speaking Population by Census Block Group.....	25
Exhibit 6.10	School English Learner (EL) Population.....	26
Exhibit 6.11	English Learner (EL) Trends.....	27
Exhibit 6.12	Language Spoken by Staff Role.....	29
Exhibit 6.13	Beneficial Materials to Assist with LEP Communication.....	30
Exhibit 6.14	Languages Spoken by Stakeholder Clientele/Members.....	31
Exhibit 6.15	Implementation Plan.....	35
Exhibit 7.1	Non-Elected Committee Membership Table.....	37
Exhibit 11.1	City of Calabasas Adopting Resolution.....	47
 <b>Appendix</b>		
Exhibit A.1	2022 Stakeholder Survey.....	49
Exhibit A.2	2022 Staff/Driver Survey.....	50
Exhibit A.3	2019 Customer Survey.....	51

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## 1. Title VI Notice and Locations

### Exhibit 1.1 Calabasas Transit System Title VI Notice to the Public



#### CITY of CALABASAS

##### Calabasas Transit System Title VI Notice to the Public

As a recipient of federal funds, the Calabasas Transit System has certified and provided assurances that it will fully comply with Title VI of the Civil Rights Act of 1964. The City is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services, on the basis of race, age, disability, religion, color, sex, or national origin.

No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service that the City furnishes on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, age, disability, religion, color, sex, or national origin, in full compliance with Title VI.

- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI while using City services may file a complaint with the City. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact the Calabasas Transit System Title VI Program Administrator by phone at (818) 224-1600 or by visiting the City of Calabasas city hall located at 100 Civic Center Way, Calabasas, CA 91302.
- For more information about Calabasas Transit System's Title VI Program and complaint procedure, contact (818) 224-1600 or visit the website at [www.cityofcalabasas.com/departments/traffic/shuttle.html](http://www.cityofcalabasas.com/departments/traffic/shuttle.html).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Title VI Program Coordinator, FTA Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590.

**If information is needed in another language, please call (818) 224-1600.  
Si necesita información en otro idioma, por favor llame al (818) 224-1600.**

برای دریافت اطلاعات به زبانی غیر از انگلیسی لطفاً با شماره تلفن (818) 224-1600 تماس بگیرید.

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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#### Title VI List of Locations Where Title VI Notice Is Posted

The Calabasas Transit System Title VI Notice to the Public is currently posted on notice boards at the following locations:

Exhibit 1.2 List of Locations Where Title VI Notice Is Posted

Location	Address
Onboard transit vehicles	-----
City website	<a href="http://www.cityofcalabasas.com/departments/traffic/shuttle.html">www.cityofcalabasas.com/departments/traffic/shuttle.html</a>
City Hall	100 Civic Center Way, Calabasas

The Calabasas Transit System Title VI Complaint Procedure/Form and program information are also provided on the City of Calabasas' transit website at:

[www.cityofcalabasas.com/departments/traffic/shuttle.html](http://www.cityofcalabasas.com/departments/traffic/shuttle.html).



## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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## 2. Title VI Complaint Procedures and Form

### Title VI Complaint Procedure

Any person who believes that he or she, individually, or as a member of any specific class or persons, has been subject to discrimination on the grounds of race, age, disability, religion, color, sex, or national origin with regard to any Calabasas Transit System service, program, or facility, may file a written complaint with the City of Calabasas.

A complaint must be filed with 180 days after the date of the alleged discrimination, unless the time for filing is extended by the City.

All complaints alleging discrimination should be submitted in writing directly to the Calabasas Transit System Title VI Program Administrator at the address listed below. The Calabasas Transit System Title VI Program Administrator or his/her designee shall be responsible for overseeing investigations and responses to complaints of discrimination.

City of Calabasas  
Attn: Calabasas Transit System Title VI Program Administrator  
100 Civic Center Way  
Calabasas, CA 91302

All complaints should be completed and submitted on the Calabasas Transit System Title VI complaint form available online at [www.cityofcalabasas.com/departments/traffic/shuttle.html](http://www.cityofcalabasas.com/departments/traffic/shuttle.html), by phone request at (818) 224-1600, or in person at the City of Calabasas city hall located at 100 Civic Center Way, Calabasas, CA 91302. Additional accessible formats of the form are also available upon request.

At a minimum, all complaints filed must provide the following information:

1. Complainant's name,
2. Complainant's address,
3. Complainant's phone number,
4. Complainant's email (if applicable),
5. Detailed description of complaint/incident,
6. Date of complaint/incident,
7. Time of complaint/incident,
8. Location of complaint/incident,
9. Route number (if applicable),
10. Name(s) and contact information of witnesses (if applicable),
11. Any other information relevant to the complaint, and
12. Signature (with date) of person submitting complaint.

Complaints received with incomplete information may result in delayed investigations and responses. The City will provide assistance in writing a complaint if the complainant is unable to do so. All complaints MUST be signed.

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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Within 10 business days of receiving the complaint, the City's Title VI Program Administrator will review to determine if the City of Calabasas has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the City.

If the complaint submitted is within the City's jurisdiction and is complete, a case will be opened and a case number and investigator will be assigned.

If necessary, an investigation will be conducted and completed within 30 days of the receipt of the formal complaint (30-Day Rule).

- If a time extension to the 30-Day Rule is required, the complainant will be notified in writing of the reason for the extension.

If additional information is required to resolve the case, the City may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Title VI Program Administrator investigator. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the City may administratively close the case.

A case may also be closed administratively if the complainant no longer wishes to pursue their case. Following the investigation, the Title VI Program Administrator will issue one of two letters to the complainant:

1. Closure Letter; or
  2. Letter of Finding (LOF).
- A Closure Letter summarizes the complaint allegations and will state that there was no Title VI violation and that the case will be closed.
  - A LOF will summarize the complaint allegations and the investigation regarding the alleged incident. The LOF will also explain whether any disciplinary action, additional training of the staff member, or other action, will occur.

If the complainant is unsatisfied with the decision, he/she has 30 days from the date of the City's Closure Letter or the LOF to appeal to the Calabasas City Council or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and to separation of functions (i.e. a decision by a person not involved with the initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.

The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590

**Calabasas Transit System  
Title VI Complaint Form**

Please print clearly or type responses.

Section 1			
Name:			
Address:			
Phone Number: (     )			
Email:			
Accessible Format Requirements (circle if applicable):			
Large Print	Audio Tape	TDD	Other
If Other, specify:			
Section 2			
Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes* <input type="checkbox"/> No			
*If you answered Yes, please skip to Section 3.			
What is the name of the person for whom you are filing the complaint?			
Name:			
What is your relationship to this person?			
Relationship:			
Please explain why you are filing on behalf of a third party.			
Please confirm that you have obtained permission of the aggrieved party to file on their behalf.			
<input type="checkbox"/> I HAVE obtained permission to file this complaint on behalf of the person named above.			
<input type="checkbox"/> I HAVE NOT obtained permission to file this complaint on behalf of the person named above.			
Section 3			
I believe the discrimination I experienced was based on (circle all that apply):			
Race	Age	Disability	Religion
Color	Sex	National origin	
Date of alleged discrimination (mm/dd/yyyy): ____ / ____ / _____			
Please explain as clearly as possible what occurred and why you believe you were discriminated against. Describe all persons who were involved and provide contact information of the person(s) if available/known. Please also provide the names and contact information of any witnesses involved. If additional space is needed, please attach pages as necessary.			

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

Section 4	
Have you previously filed a Title VI complaint with the City of Calabasas? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No* *If no, please skip to Section 5.	
If yes, please indicate where you have filed this complaint:	
<input type="checkbox"/> Federal Agency	specify: _____
<input type="checkbox"/> State Agency	specify: _____
<input type="checkbox"/> Local Agency	specify: _____
<input type="checkbox"/> Federal Court	specify: _____
<input type="checkbox"/> State Court	specify: _____
Please provide contact information for the agency and/or court where this complaint was filed:	
Name: _____	
Title: _____	
Agency: _____	
Address: _____	
Phone number: ( _____ ) _____	
Email: _____	
Section 5	
Please indicate who you are filing this complaint against:	
<input type="checkbox"/> Calabasas Transit System <input type="checkbox"/> City of Calabasas <input type="checkbox"/> Other agency and/or person (specify): _____	

You may attach any written materials or other information which you believe is relevant to your complaint.

Signature and date are required below to complete the form.

Signature \_\_\_\_\_ Date \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Please submit this completed form in person or by mail to the address below.

Calabasas Transit System  
Title VI Program Administrator  
100 Civic Center Way  
Calabasas, CA 91302

If information is needed in another language, please call (818) 224-1600.  
Si necesita información en otro idioma, por favor llame al (818) 224-1600.  
برای دریافت اطلاعات به زبانی غیر از انگلیسی لطفاً با شماره تلفن (818) 224-1600 تماس بگیرید.

# 2022 City of Calabasas Title VI Program

Calabasas Transit System

July 2022

## 3. Summary of Complaints, Investigations, and Legal Actions

Per FTA Circular 4702.1B, “all recipients are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin”:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient (i.e., City of Calabasas and/or the City of Calabasas Transit System).

To date, neither the Calabasas Transit System nor the City of Calabasas has been subject to any Title VI investigations, Title VI complaints, or Title VI lawsuits. Below is a matrix which will be utilized by City staff to internally track and report any and all future incidents:

Exhibit 3.1 Title VI Investigations, Lawsuits, and Complaints Summary Table

Case / Reference Number	Date MM/DD/YYYY (Month/Day/Year)	Summary (Include basis of complaint: race, color, or national origin)	Current Status	Action(s) Taken
<b>Active Investigations</b>				
XXX				
XXX				
<b>Lawsuits</b>				
XXX				
XXX				
<b>Complaints</b>				
XXX				
XXX				

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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### 4. Public Participation Plan

The City of Calabasas has developed this Public Participation Plan as part of its Title VI Program. Calabasas Transit System is committed to ensuring it provides equal and equitable access to its services throughout Calabasas in the safest and most cost-effective manner possible. Through a combination of input and insight from community residents, current and prospective riders, community stakeholders, and City staff, the City of Calabasas has enhanced its methodologies of reaching the public within its service area and will be able to further refine its strategies in the future.

#### Approach to Public Participation

The public participation process will be considered at the earliest stages of any Calabasas Transit System project or service enhancement which may impact the surrounding communities, existing riders, and potential riders. As transit-related services and projects vary in scope and goals, the public participation process will be tailored to most effectively assist each. The following process outlines tools and strategies to ensure that public input is invited and all foreseeable impacts to the service area communities are considered.

The City has developed three prioritized categories of projects which guided the development of minimum public participation requirements. During the initial planning phase of each transit-related project or major service revisions, City of Calabasas staff will identify into which level the project falls and develop a tailored participation plan accordingly. At any time during a project's development and/or implementation process, the project may be reclassified to a higher level, if City of Calabasas staff deems appropriate. The levels of public participation are presented below.

- **Baseline** – Routine service, schedule, and system enhancements and revisions. Also includes short- (less than one year) term projects where potential impacts to the Calabasas Transit System and its customers should be considered during planning phases.

Examples include minor schedule revisions<sup>1</sup> and impacts to service due to routine maintenance or construction, as well as updates to service branding, fare media, and collateral.

- **Moderate** – Projects involving a year or longer of development and/or implementation where impacts to existing and future riders must be considered.

Examples include development and implementation of new/expanded services, any elimination of service (whether through elimination of service to a particular area or a decrease in the level of service), development of Short Range Transit Plans, Marketing Plans, and facility/storage construction projects, etc. Any project within this level to be conducted by a third-party (i.e., consultant or contractor) will include public participation requirements and criteria as part of the RFP process.

- **High** – Projects involving multiple years of development and/or implementation where impacts to existing and future riders must be considered.

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<sup>1</sup> "Minor schedule revisions" generally refer to adjustments to existing schedules to improve on-time performance and schedule adherence. For example, it might include changing a trip departure time by two or three minutes so as to better accommodate a school bell schedule. It does not include the elimination or addition of trips.

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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Examples include Comprehensive Operational Analyses, development and construction of transit center/facilities, transit system redesign (complete overhaul of existing system and operations), transition of administration of services, etc. Any project within this level to be conducted by a third-party (i.e., consultant or contractor) will include public participation requirements and criteria as part of the RFP process.

#### Outreach Requirements and Activities

The following activities are intended to serve as guidelines for each level of outreach to ensure existing and future riders of Calabasas Transit System services are provided with equal access and opportunity to participate in transit and transportation planning.

#### Baseline Level – Minimum Outreach

- Notice for public events may include car-cards, posters, email blasts, notices posted to City website, media releases to local papers, or radio announcements (as funding allows).
- Any notice will be posted no less than one week prior to the public event.
- Notices may be posted at the same locations used for posting of Title VI notifications.
- Whenever possible, information regarding public participation opportunities will also be posted on the City of Calabasas Transit System website at least two weeks prior to the event.
- Comments will be accepted at public outreach events and via email, mail, and phone to ensure that all populations have the opportunity to participate. The comment period will open no less than one week prior to the first outreach event and close no less than one week following the last outreach event.
- When feasible, the City will provide notification two weeks in advance of any change to the service.<sup>2</sup>
- All meeting/outreach locations will be ADA accessible.

#### Moderate Level – Minimum Outreach

- All applicable Baseline Level elements are included within Moderate Level projects.
- Unique notices/fliers will be developed and posted a minimum of two weeks in advance for the following outreach activities (as deemed appropriate for each project):
  - Focus group participation,
  - Stakeholder discussions,
  - Community surveying efforts, and
  - Customer survey efforts.
- Where more than one workshop or meeting open to the public is planned, the workshops shall be scheduled throughout all day-parts (i.e., mornings, afternoons, and evenings) as funding and resources allow to maximize opportunity for participation.
- Public participation events shall be held in central locations within walking distance of fixed-routes stops whenever feasible.
- Materials may be developed specifically for public participation including FAQ sheets, presentation slides, newsletters, and media releases.

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<sup>2</sup> Two weeks' notice may not always be achievable, such as in cases where service is disrupted due to construction. In such cases, the City will provide notice as soon as is feasible.



## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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#### High Level – Minimum Outreach

- All applicable Baseline and Moderate Level elements are included within High Level projects.
- The City shall conduct expanded outreach to community stakeholders and its partners.
- The City shall investigate the formation of a transit-oriented committee to guide the development and implementation of the project and public participation.
- The City shall expand regional entity participation, including but not limited to Los Angeles County Metropolitan Transportation Authority (LACMTA), City of Thousand Oaks, Ventura County Transportation Commission, and other nearby transit operators by seeking comments and participation in project meetings and planning activities.

Currently, Farsi/Persian and Spanish are the two most frequently spoken languages by persons who speak English less than “very well.” However, neither of these populations is large enough to qualify under the Safe Harbor provision. The City of Calabasas will continue assessing the language needs of citizens in its service area through its Language Assistance Plan. Should any population with limited English proficiency reach or surpass population levels as defined by the FTA Title VI Circular (currently five percent of the total service area population or 1,000 persons, whichever is less), the City will reassess this element of its Title VI program and the strategies presented below.

#### Outreach Methods for Engaging Limited English Proficient Populations

##### Baseline Level – Minimum LEP Outreach

- The City will make event information available to community groups and agencies that work with LEP populations, if such contacts exist.
- When it is deemed appropriate or necessary, the City will ensure non-English interpretation in additional languages is made available.

##### Moderate Level – Minimum LEP Outreach

- All applicable Baseline Level elements are included within Moderate Level projects.
- The City will continue cultivating relationships with community agencies that serve LEP populations.
- Public outreach events may include attending already existing community meetings and gatherings, such as school meetings, farmers markets, faith-based events, and other community activities, in order to invite participation from LEP populations who may not attend City-hosted public events.

##### High Level – Minimum LEP Outreach

- All applicable Baseline and Moderate Level elements are included within High Level projects.
- The City will ensure that non-English language interpretation will be available at any public meeting or workshop associated with a High Level project as deemed appropriate and necessary.

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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## 5. Summary of Outreach Efforts

There are two primary modes of outreach conducted with respect to the Calabasas Transit System, recurring and as-needed. Recurring outreach efforts focus on the sustaining and developing long-term relationships built with local organizations and communities, while as-needed outreach focuses on supporting and achieving near-term goals such as improving ridership, and promoting enhancements to service provision.

### Recurring Outreach Efforts

- Customer Service Interactions – Calabasas Transit System drivers field questions and customer service requests from customers and the general public in both English and other languages several times per week.
- Public Noticing – Submitted as required to local paper of record. Notices are provided for significant transit-related developments, including planning studies, and revisions to existing services and/or policies.

### Completed As-Needed Outreach Efforts

- City of Calabasas Staff/Driver Survey – During the development of this Title VI Program (June 2022) the City of Calabasas conducted a brief employee survey to identify available language resources, and potential language-based barriers to transit usage. A total of nine surveys were completed. Additional information on the survey findings may be found in Chapter 6. The survey instrument is provided in the Appendix.
- Stakeholder Survey – In June 2022 a service-area wide stakeholder survey was conducted to obtain insight from various governmental, social services, educational, and faith-based organizations, with respect to their clientele’s ability to speak English and utilize public transit. The survey also identified the likelihood of language barriers to transit usage. A total of 28 organizations were contacted and six surveys were completed. Additional information on the survey findings may be found in Chapter 6. The survey instrument is provided in the Appendix.
- Customer Survey – in August 2019, a rider survey was conducted onboard the City’s transit system. Surveyors were positioned onboard Line 1 and Trolley routes, while drivers distributed surveys to Dial-A-Ride customers. Riders on the peak-period routes were given the opportunity to take the survey online. A total of 42 responses were received. Additional information on the survey findings may be found in Chapter 6. The survey instrument is provided in the Appendix.

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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## 6. Language Assistance Plan (LAP)

This Four Factor Analysis and Language Assistance Plan was developed concurrently with the City's Title VI Program to ensure its services are accessible to Limited English-Proficient (LEP) individuals. Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally funded transit services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

The Calabasas Transit System Title VI Program was prepared in June 2022 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

The City's Title VI Program Administrator is:

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Email: [tbezdecny@cityofcalabasas.com](mailto:tbezdecny@cityofcalabasas.com)

Additional information regarding the Title VI Program is available at:

[www.cityofcalabasas.com/departments/traffic/shuttle.html](http://www.cityofcalabasas.com/departments/traffic/shuttle.html)

### Calabasas Transit System Service Area and Services

The City of Calabasas is located in the northern portion of California's Los Angeles County. It is an area primarily residential in character, with pockets of retail located on the outer edge of the city. Calabasas is accessible via U.S. Highway 101 on the northern boundary of the City, and Malibu Highway along the southern boundary. The fixed-route service primarily serves the city of Calabasas.

The Calabasas Transit System operates one general public, fixed-route citywide route Monday through Friday, 6:30 a.m. to 6:00 p.m., and four peak-hour routes Monday through Friday, 7:07 a.m. to 8:40 a.m. and 2:15 p.m. to 3:48 p.m. (as well as 12:30 p.m. to 2:48 p.m. on Wednesdays). The City also offers a weekend shuttle service that operates Saturday between 10:00 a.m. and 10:00 p.m. (with a break from 3:00 p.m. to 4:00 p.m.). Two Dial-A-Ride vehicles are available Monday through Thursday from 8:00 a.m. to 6:30 p.m. and Friday from 8:00 a.m. to 5:00 p.m. One vehicle is available on Saturday from 9:00 a.m. to 5:00 p.m. and on Sunday from 10:00 a.m. to 4:00 p.m.

# 2022 City of Calabasas Title VI Program

## Calabasas Transit System

July 2022

Paratransit services are provided by Access Services and Cityride (LADOT.)

Exhibit 6.1 Calabasas Transit System Fleet Inventory

Vehicle Number	Make	Year	Pax	WC	Length	Fuel	Mileage	Odometer reading date
3	Ford	2010	20	2	18'	Diesel	302,745	4/30/22
4	Ford	2004	34	2	18'	Diesel	321,620	10/12/21
5	Ford	2003	30	2	18'	Diesel	307,220	10/12/21
6 (Trolley)	Ford	2005	34	2	22'	Diesel	317,741	4/30/22
7	Chevy	2016	29	2	22'	CNG	245,452	1/31/22
8*	Chevy	2005	30	0	26.3'	Diesel	219,478	12/8/20
9*	Ford	2005	30	0	18'	Diesel	258,034	12/8/20
10	Chevy	2009	24	2	26.3'	Diesel	191,609	4/30/22
11	Ford	2003	24	2	18'	Diesel	208,921	4/30/22
12	Ford	2016	28	2	22'	CNG	34,497	1/31/22
13	Ford	2016	28	2	22'	CNG	37,616	4/30/22
14	Ford	2019	28	2	22'	CNG	9,295	4/30/22
15	Ford	2019	28	2	22'	CNG	7,895	4/30/22

\*Currently out of service.

The City's transit program is headquartered at Calabasas city hall located at 100 Civic Center Way, Calabasas, CA 91302.

### Language Assistance Goals

One of the overarching goals of the Calabasas Transit System Title VI Program is to ensure meaningful access for LEP customers to transit services, information, and materials through the development of a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

### 6a. Four-Factor Analysis

The U. S. Department of Transportation (USDOT) requires transit funding recipients to take reasonable steps to ensure meaningful access to programs by limited English proficient (LEP) persons. As a recipient, the City performed a Four Factor Analysis to assess language needs and determine what steps it will take to ensure LEP persons can effectively access and utilize transit services. The four factors analyzed are described below.

***Factor 1: The number or proportion of Limited English Proficiency (LEP) persons eligible to be served or likely to be encountered by Calabasas Transit System services.***

Estimating the number or proportion of LEP individuals that may be encountered by the Calabasas Transit System will help identify the populations covered by the USDOT's Safe Harbor Provision. This provision stipulates that if an LEP group speaking a non-English language constitutes five percent or 1,000 persons, whichever is less, of the total population of persons likely to be encountered by transit services, then the service provider must make the following materials and services available to speakers of that language:

# 2022 City of Calabasas Title VI Program

## Calabasas Transit System

July 2022

- Documents critical for accessing recipient’s services or benefits,
- Letters requiring response from customer,
- Informing customers of free language assistance,
- Complaint forms, and
- Notification of rights.

### Service Area Demographics

The service area demographic analysis describes potential Title VI-protected populations residing within Calabasas Transit System’s service area, including their approximate size and geographic distribution. Title VI-protected populations within the service area include LEP persons. Specific groups considered include:

#### 1. Potential LEP Language Groups

- Spanish
- Farsi/Persian
- Russian
- Chinese

The American Community Survey (ACS) provides information at various levels on multiple topics. For the purposes of this Title VI program, our assessment utilized the population estimates provided in the City of Calabasas geographic boundaries.

Exhibit 6.2 Racial Breakdown of Total Population of Service Area

Race or Ethnicity	Calabasas		Los Angeles County		California	
	Estimate	Percent of Total	Estimate	Percent of Total	Estimate	Percent of Total
White	20,385	85.5%	5,431,218	54.1%	22,053,721	56.1%
Black or African American	766	3.2%	936,285	9.3%	2,250,962	5.7%
Asian	2,760	11.6%	1,678,734	16.7%	5,834,312	14.8%
Native Hawaiian/Pacific Islander	93	0.4%	58,104	0.6%	149,636	0.4%
American Indian/Alaska Native	218	0.9%	176,427	1.8%	311,629	0.8%
Some other race alone	199	0.8%	2,546,006	25.4%	5,623,747	14.3%
Two or more races	886	3.7%	259,209	2.6%	3,122,016	7.9%
Hispanic or Latino	1,840	7.7%	4,851,344	48.3%	15,380,929	39.1%
Total	23,842	100.0%	10,040,682	100.0%	39,346,023	100.0%

*American Community Survey 2020 five-year estimates*

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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The American Community Survey data presents language spoken at home for persons five years of age and older. Recent changes to the data available through the American Community Survey have made it more difficult to identify potential LEP languages. The 2020 ACS five-year estimates for Calabasas identified a limited number of individual languages, instead grouping some languages together. The languages and groups identified include:

- Spanish;
- French, Haitian, or Cajun;
- German or other West Germanic Languages (such as Yiddish or Dutch);
- Russian, Polish, or other Slavic Languages (such as Ukrainian, Polish, or Serbo-Croatian);
- Other Indo-European Languages (such as Italian, Portuguese, Greek, Armenian, Persian/Farsi, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, Telugu, Tamil, and Kannada.);
- Korean;
- Chinese (including Mandarin and Cantonese);
- Vietnamese;
- Tagalog/Filipino;
- Other Asian and Pacific Island Languages (such as Japanese, Hmong, Khmer, Thai, Lao, Samoan, and Hawaiian);
- Arabic; and
- Other and Unspecified Languages (such as Navajo, other native languages of North America, Hebrew, Amharic, Somali, Yoruba, Igbo, Swahili, and Hungarian).

Prior to 2016, the ACS provided a detailed analysis of English proficiency for speakers of individual languages. Beginning in 2016, this data was still available at the state level and for several major metropolitan areas, but not for smaller locations such as Calabasas. As a result, it is necessary to draw on other localized sources (such as English learner data, discussed later in this section) to identify language needs in the service area.

ACS 2020 estimates revealed 70.3 percent of Calabasas Transit System service area residents spoke only English at home. While just under 30 percent speak a language other than English at home, only 10.9 percent indicated speaking English less than “very well.” The most frequently cited individual language in Calabasas is Chinese (1.7 percent of residents). However, 1.5 percent of LEP residents indicated speaking “Russian, Polish, or other Slavic languages.” Given other data available, it is likely a large number of these individuals speak Russian. Likewise, it is likely a large number of the LEP residents who speak “other Indo-European languages” (4.1 percent) speak Farsi/Persian.



## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

Exhibit 6.3 Languages Spoken at Home By Community

Language Spoken at Home	Calabasas		Los Angeles County		California	
	Estimate	Percent of Total	Estimate	Percent of Total	Estimate	Percent of Total
Total Population	22,804	100.0%	9,447,621	100.0%	36,936,941	100.0%
Total Speak only English	16,032	70.3%	4,148,408	43.9%	20,725,855	56.1%
Total Speak language other than English	6,772	29.7%	5,299,213	56.1%	16,211,086	43.9%
Total Speak English "very well"	4,276	18.8%	3,108,129	32.9%	9,439,856	25.6%
Total Speak English less than "very well"	2,496	10.9%	2,191,084	23.2%	6,771,230	18.3%
Speak English less than "very well" - breakdown						
Speak Arabic	137	0.6%	16,509	0.2%	69,895	0.2%
Speak Spanish	143	0.6%	1,458,177	15.4%	4,083,013	11.1%
Speak Chinese	396	1.7%	228,429	2.4%	677,675	1.8%
Speak Russian, Polish, or other Slavic languages	351	1.5%	28,674	0.3%	98,880	0.3%
Speak Other Indo-European Languages	938	4.1%	142,331	1.5%	373,176	1.0%
<i>American Community Survey 2020 five-year estimates</i>						

*LEP individuals from other language groups comprise 0.5 percent or less of the city's population and are not reflected within this exhibit.*

# 2022 City of Calabasas Title VI Program

## Calabasas Transit System

July 2022

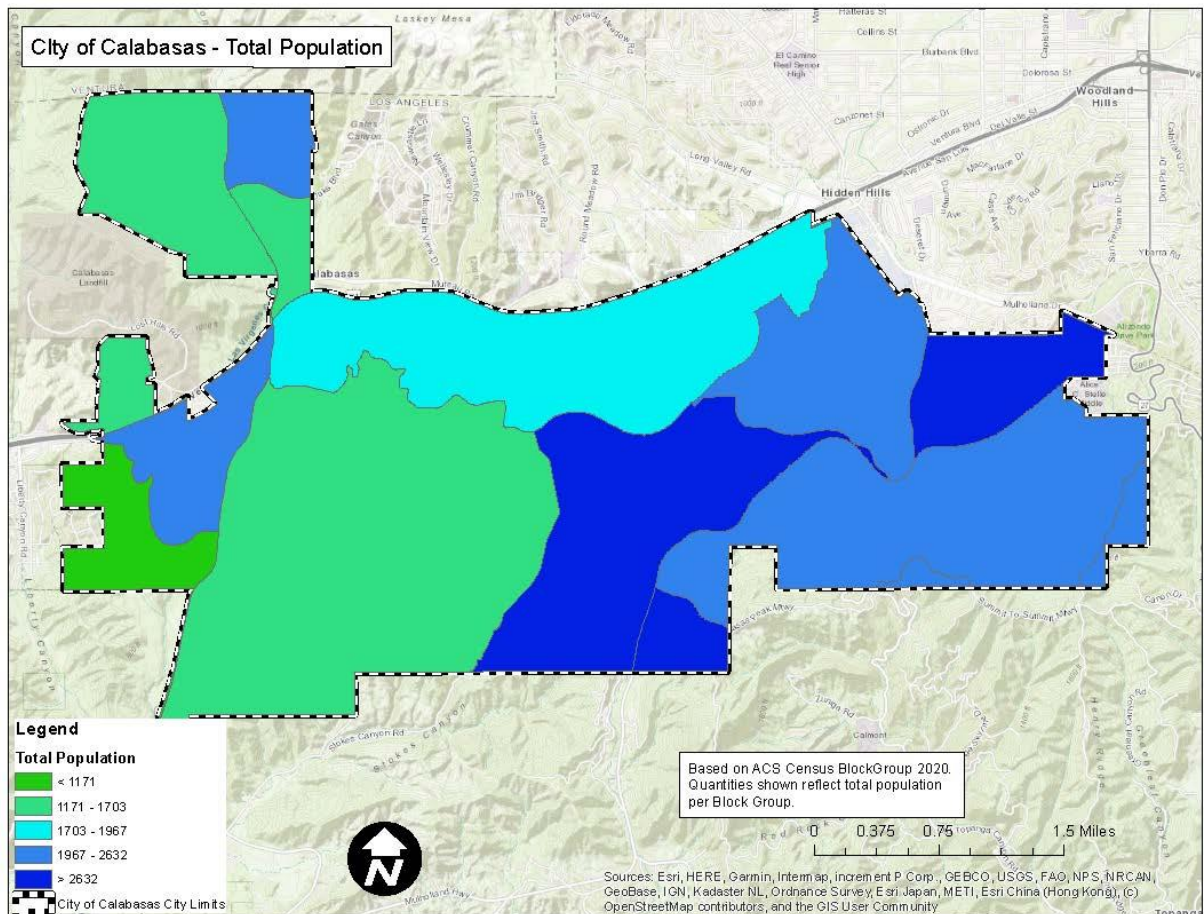
### Demographics by Census Block Group

This section takes a closer look at the overall demographic characteristics discussed in the previous section, using block group-level American Community Survey data to show the geographic distribution of various populations.

### Total Population

The greatest concentration of the approximately 23,000 people in the Calabasas Transit System service area lives in the central and eastern Calabasas neighborhoods of Calabasas Hills, Calabasas Park Estates, Greater Mulwood, and Park South.

Exhibit 6.4 Total Population by Census Block Group



# 2022 City of Calabasas Title VI Program

## Calabasas Transit System

July 2022

### Race/Ethnicity

The 2020 American Community Survey reveals the White population makes up the largest group at 85.5 percent, followed by Asian at 11.6 percent. Persons of Hispanic or Latino heritage comprise approximately 7.7 percent of the total service area population.

Exhibits 6.5 and 6.6. illustrate the concentration of Asian and Hispanic or Latino individuals residing in each census block within Calabasas.

Exhibit 6.5 Asian Population by Census Block

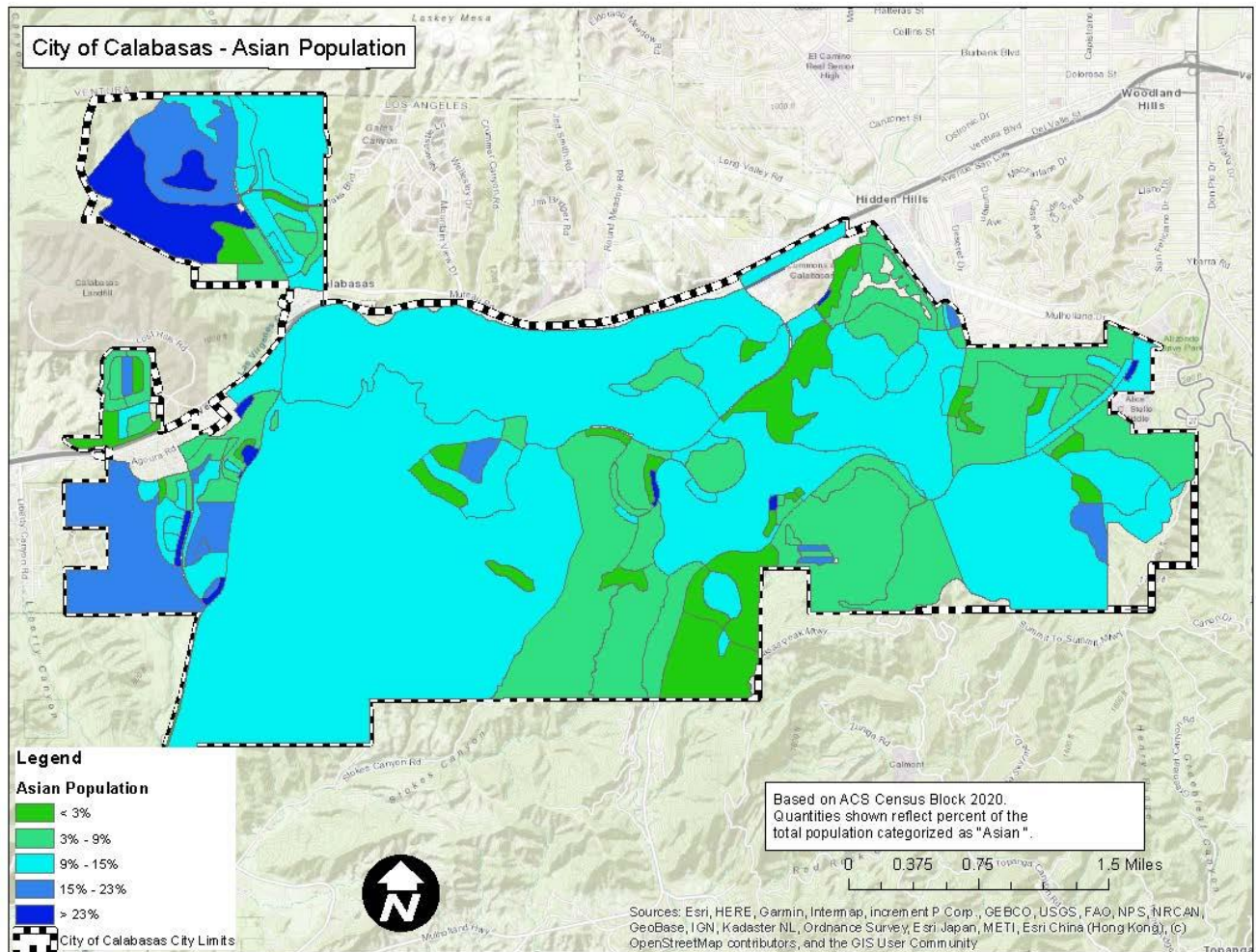
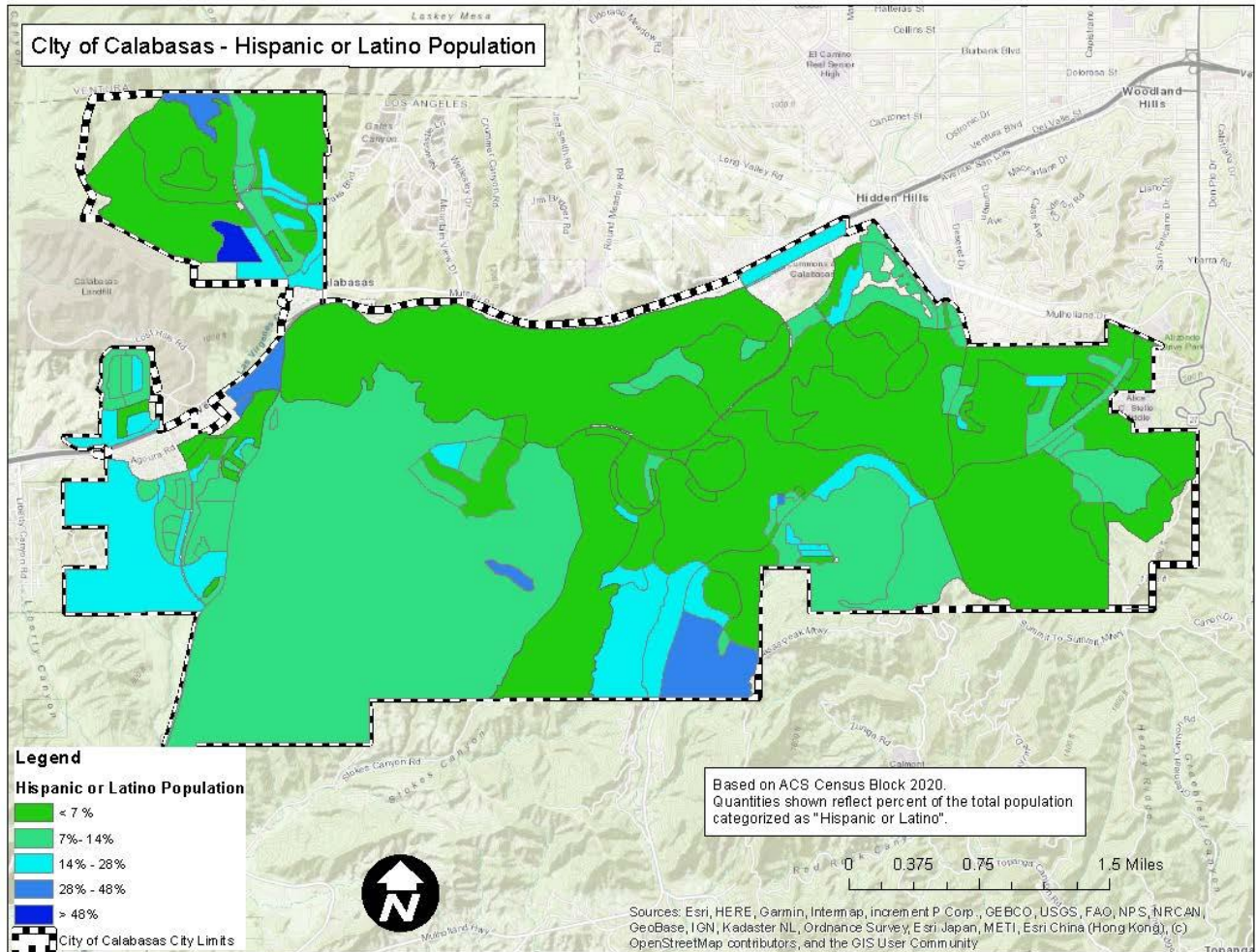


Exhibit 6.6 Hispanic or Latino Population by Census Block



# 2022 City of Calabasas Title VI Program

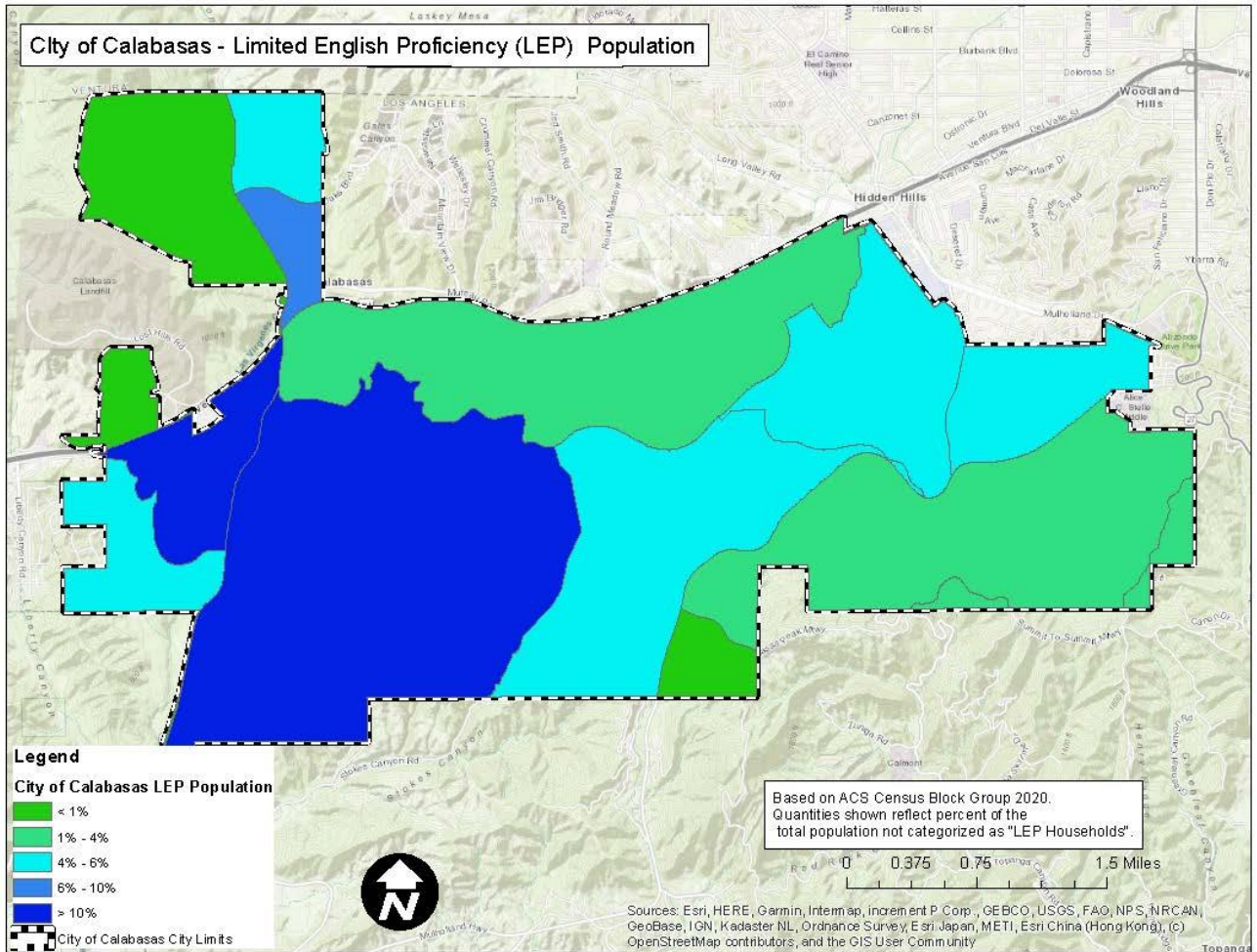
## Calabasas Transit System

July 2022

### LEP Populations

The greatest concentration of the approximately 2,500 LEP individuals in the Calabasas Transit System service area lives in the western Calabasas neighborhoods of Lone Oak, Stone Creek, The Oaks, and Via Mira Monte. The next greatest concentration is located in the Calabasas Colony and Malibu Canyon area.

Exhibit 6.7 LEP Population by Census Block Group



# 2022 City of Calabasas Title VI Program

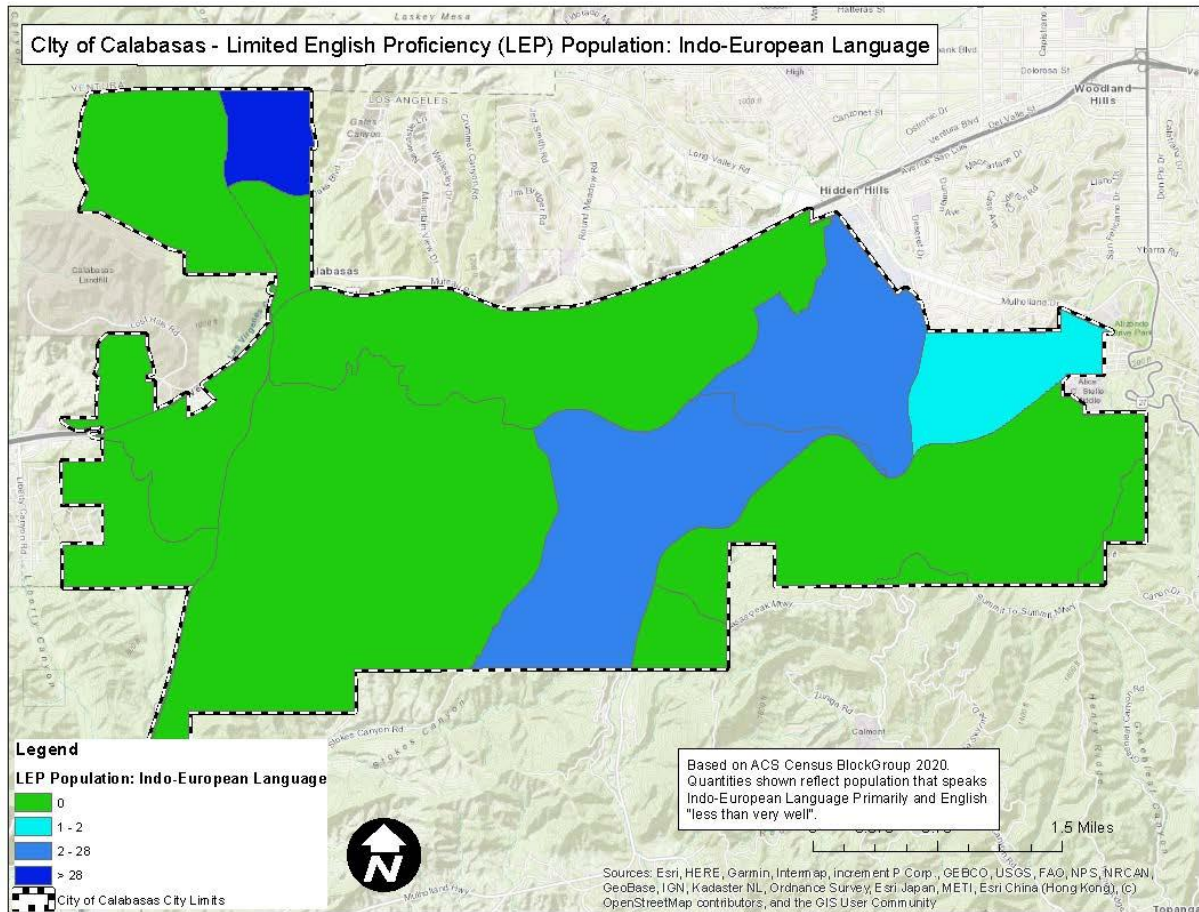
## Calabasas Transit System

July 2022

### Other Indo-European languages

Exhibit 6.8 presents the distribution of people who do not speak English “very well” but speak other Indo-European languages (such as Farsi/Persian). Given the identification of Farsi/Persian as a significant language group in the 2015 American Community Survey, as well as the prevalence of key languages as discussed in the English learner analysis, it is likely Farsi/Persian and Russian make up a good portion of the LEP individuals in this category.

Exhibit 6.8 Other Indo-European Language-Speaking Population by Census Block Group



# 2022 City of Calabasas Title VI Program

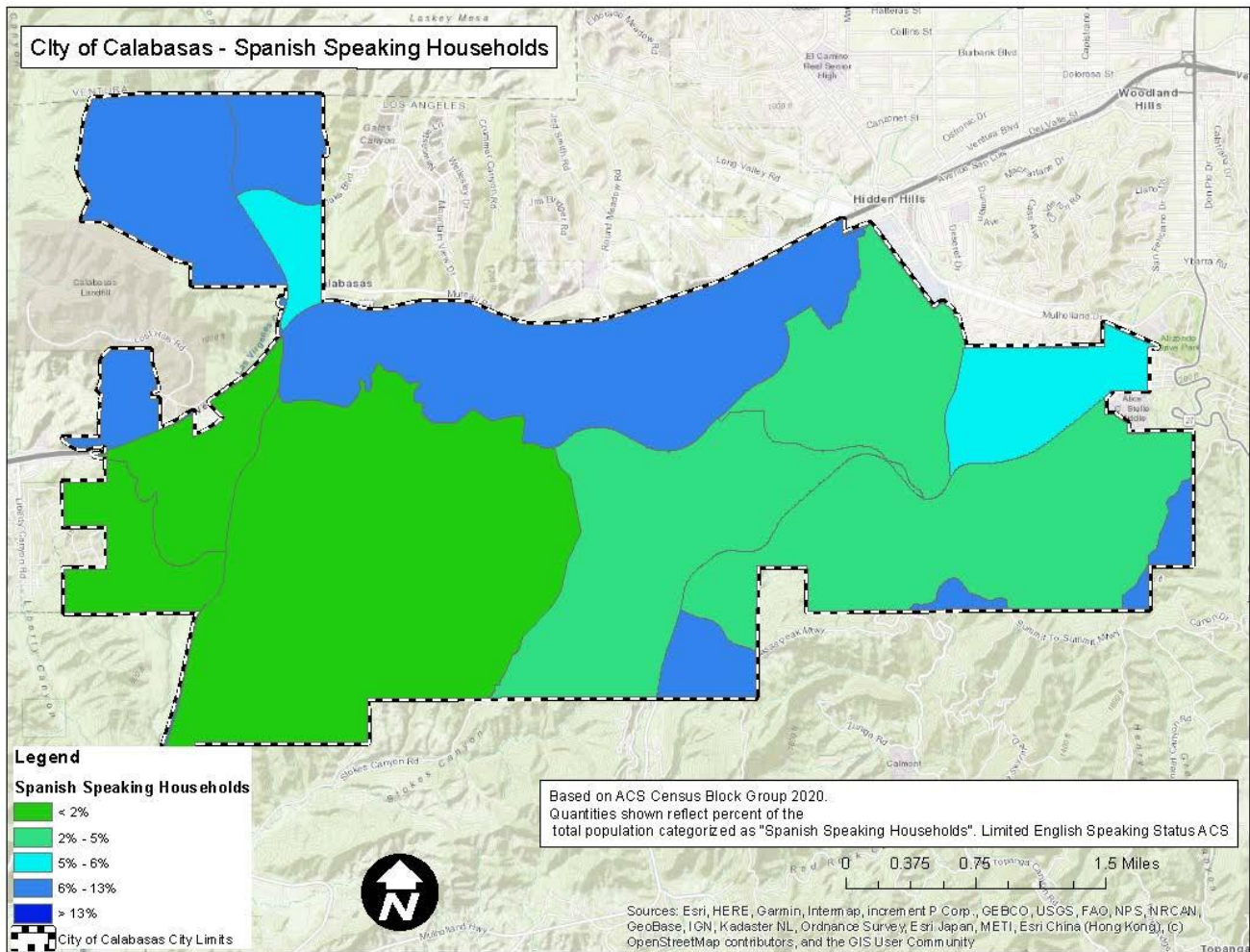
## Calabasas Transit System

July 2022

### Spanish-Speaking

Exhibit 6.9 presents the distribution of people who do not speak English “very well” but speak Spanish at home in the Calabasas Transit service area. Given there are 876 Spanish speakers in the service area, of which 143 speak English less than “very well,” Title VI does not require the City to provide vital documents in Spanish under the Safe Harbor provision.

Exhibit 6.9 Spanish-Speaking Population by Census Block Group



## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

#### City of Calabasas English Learner Data

To effectively identify the LEP populations within the Calabasas Transit System service area, and to begin monitoring/tracking changes in those groups, the City reviewed English Learner (EL) statistics for students within the City of Calabasas. Public schools within the California Department of Education (CDE) must report on their students who are English Learners – students whose native tongue is a language other than English – as well as which language is their mother tongue. This data is available online via CDE’s DataQuest website, [dq.cde.ca.gov/dataquest/](http://dq.cde.ca.gov/dataquest/).

The City accessed the available EL data for the 2021/2022 school year to complete its comprehensive assessment of the populations it provides service to, including what LEP populations exists and where these groups may be concentrated. Periodically reviewing this data will enable the City to monitor which non-English languages are growing in order to provide appropriate language assistance services.

Consistent with data from the 2020 American Community Survey, the highest concentrations of EL students within Calabasas speak Farsi/Persian, Spanish, or Russian. In addition, Hebrew is spoken by English Learners with a greater frequency as Spanish. Detailed counts and relative percentages are presented in the table below. (It should be noted that not all schools within the Las Virgenes Unified School District are located within Calabasas. As such, only schools located in Calabasas were examined in detail.)

Exhibit 6.10 English Learner (EL) Population

School	Farsi (Persian)	Hebrew	Spanish	Russian	Other non-English languages	Total English Learners	Total School Population
Bay Laurel Elementary School	16	3	7	9	6	41	493
Chaparral Elementary School	11	20	10	4	17	62	537
Lupin Hill Elementary School	8	7	3	16	17	51	467
Alice C. Stelle Middle School	8	3	2	1	1	15	777
Arthur E. Wright Middle School	4	2	1	3	1	11	632
Calabasas High School	2	5	6	3	4	20	1,853
<b>Total all Calabasas schools</b>	<b>49</b>	<b>40</b>	<b>29</b>	<b>36</b>	<b>46</b>	<b>200</b>	<b>4,759</b>
Percentage of Calabasas student population	1.03%	0.84%	0.61%	0.76%	0.97%	4.20%	100.00%
<b>All Las Virgenes USD</b>	<b>73</b>	<b>77</b>	<b>118</b>	<b>67</b>	<b>108</b>	<b>443</b>	<b>10,064</b>
Percentage of LVUSD student population	0.73%	0.77%	1.17%	0.67%	1.07%	4.40%	100.00%

While 2021-2022 data provides a revealing snapshot of English learners in Calabasas, it is also helpful to look at trends across several years. English learners are considered to be English learners until they are reclassified as proficient in English. As a result, a downward trend in English learners can mean some are achieving proficiency and being reclassified, or alternately leaving the district. An increase in English learners would reflect new English learners moving into the district, which can be indicative of an increasing population of speakers of those languages in the community.



## 2022 City of Calabasas Title VI Program

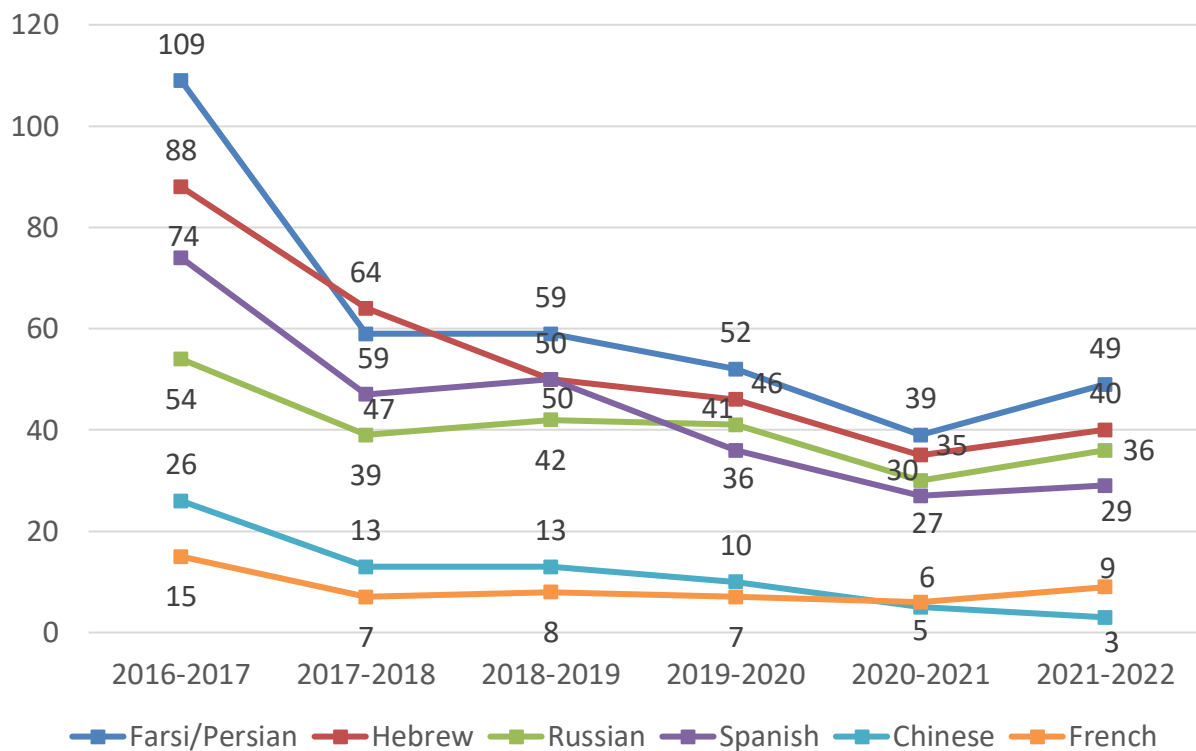
### Calabasas Transit System

July 2022

Across the last six years, the same four languages have consistently had the highest number of English learners (ELs) in Calabasas schools. All four languages have experienced a significant net decrease in the incidence of English learners in the last six years, ranging from 33.3 percent (Russian) to 60.8 percent (Spanish). Over the past three years, the number of English learners continued to decrease. Farsi/Persian had the greatest number of English learners in 2021-2022 (49), despite decreasing a net 5.8 percent over the last three years. Hebrew, the next greatest number of ELs in 2021-22 (40), experienced a net decrease of 13 percent. Russian (36 ELs) and Spanish (29 ELs) had net decreases of 12.2 percent and 19.4 percent, respectively, across the past three years. The only language with a net increase during the last three years, though numerically modest in number, was French (28.6 percent, for a total of nine ELs in 2021-2022).

All of these four languages did experience an increase in the number of English learners in the last year. Farsi/Persian increased by approximately 26 percent, Hebrew by 14 percent, Russian by 20 percent, and Spanish by seven percent. While the overall trend has been a decline in the EL population, it is appearing to begin trending up again.

Exhibit 6.11 English Learner (EL) Trends



With respect to Farsi/Persian, Bay Laurel Elementary was the school with the highest concentration of ELs in 2021-2022 (16 students). Chaparral Elementary had the highest concentration of Hebrew ELs in 2021-2022 (20 students). Lupin Hill Elementary had the highest concentration of Russian ELs in 2021-2022 (16 students). Chaparral Elementary also had the highest concentration of Spanish ELs in 2021-2022 (10 students).

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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Farsi/Persian is categorized under the broad group of “Other Indo-European languages.” Both Lupin Hill and Bay Laurel Elementary Schools are located in census block groups with higher concentrations of “Other Indo-European languages” LEP individuals. Chaparral Elementary is not, but portions of its attendance zone are located in one of the census block groups with a higher concentration of these LEP individuals. (Russian and Hebrew are included in other language groups, as discussed above.)

As discussed above, the largest LEP populations in the Calabasas Transit System service area appear to be Farsi/Persian, Russian, Hebrew, and Spanish. According to the 2020 ACS, none of these populations are large enough to trigger the Safe Harbor Provision. In the case of Spanish and Chinese, the percentage of LEP individuals is sufficiently low to remain under the threshold of five percent or 1,000 individuals. With respect to the other languages, frequencies of LEP individuals were only available as part of a group. However, none of those groups met the five percent/1,000 individuals threshold, so none of the languages in those groups met the Safe Harbor threshold.

As such, the Safe Harbor Provision does not apply to any of the LEP populations in Calabasas. Therefore, the City is not obligated to provide the materials listed above in alternate languages. However, it is important the City monitor increases in these populations. Should any LEP population rise above the threshold, the City may need to provide the translation services and written documents translated into one of the languages listed above. It should be noted that the Safe Harbor Provision does not automatically trigger when one of the City’s LEP populations reaches 1,000 or five percent, but when the LEP population for that language reaches that threshold *and* frequently comes into contact with the transit program.

#### ***Factor 2: The frequency with which LEP persons come into contact with the City’s transit services.***

In order to estimate how often LEP populations come into contact with the City’s transit services, surveys were conducted of both riders and City staff.

#### ***Customer Survey***

The customer survey was conducted in August 2019. Surveyors were positioned onboard Line 1 and Trolley routes, while drivers distributed surveys to Dial-A-Ride customers. Riders on the peak-period routes were given the opportunity to take the survey online. A total of 42 responses were received. The survey was available in English and Spanish.

The majority of surveys (78.6 percent) were completed in English. No surveys were complete online. Sixty-nine percent of surveys were from Line 1, 7.1 percent from the Trolley, and 23.8 percent from Dial-A-Ride.

The primary languages spoken by respondents at home were generally English (71.4 percent) or Spanish (21.4 percent). Three additional languages were specified, with one respondent each: Armenian, Chinese, and French. Twenty-seven respondents (64.3 percent) said they were a native English speaker or spoke English “very well,” while the remainder spoke English less than “very well” (31 percent) or not at all (4.8 percent). No riders indicated being aware of any difficulties using the City’s transit programs due to a language barrier.

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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More than half of respondents indicated a minority race or ethnicity, either alone or combined with another race/ethnicity. The most frequently cited minority ethnicity was Hispanic/Latino (13 responses), followed by Asian (five responses) and African American/Black (three responses).

#### Staff Survey

Feedback from those who interact with Calabasas Transit customers is also crucial, as such data cannot be represented in the census or other demographic documentation, and rider surveys only capture those who are willing to participate. Observations from drivers and customer service representatives (and other “front line” staff) can provide a more accurate view of interactions with LEP individuals that cannot be gained in other ways.

Among the nine City staff members surveyed, 44 percent (four individuals) speak Spanish, one individual speaks Armenian, and one individual speaks Farsi/Persian.

Exhibit 6.12 Language Spoken by Staff Role

Language Spoken	Driver	Customer Service
Spanish	1	3
Armenian		1
Farsi/Persian		1

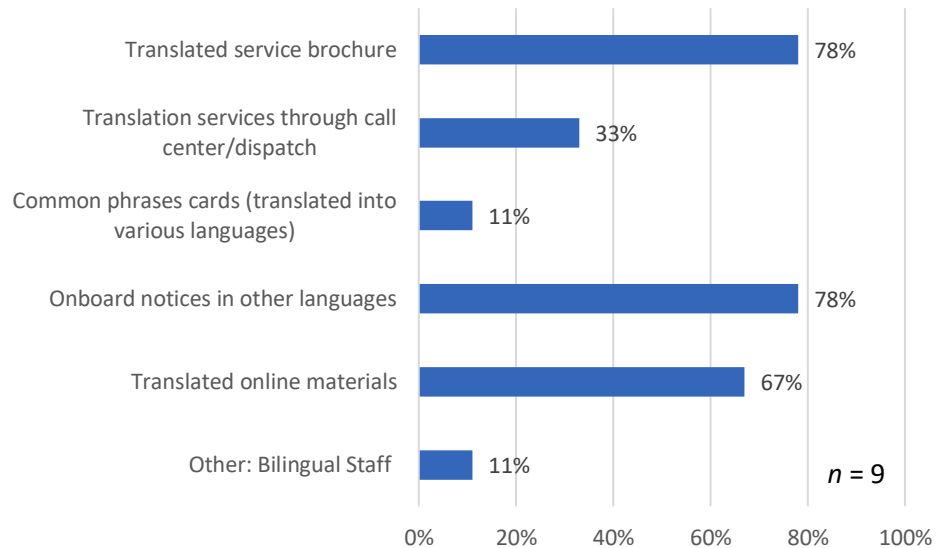
*Some staff members may represent more than one role. As such, totals may not be entirely consistent with the paragraph above.*

Staff indicated that Spanish-speaking customers are the most frequently encountered, cited by 56 percent of respondents. Two respondents each cited encountering customers speaking Chinese and Farsi/Persian, while one respondent each cited encountering customers speaking French and Vietnamese.

Four respondents (44 percent) indicated having occasional communication issues with Calabasas Transit customers who do not speak English or do not speak English well. An additional 56 percent said they have no issues.

Respondents indicated one or several additional materials to assist with communication with LEP individuals would be beneficial. Translated service brochures and onboard notices in other languages (78 percent each) were top responses, as was translated online materials (67 percent). Three individuals cited translation services through call center/dispatch would be beneficial, and one respondent cited common phrases cards translated into other languages as a beneficial resource.

Exhibit 6.13 Beneficial Materials to Assist with LEP Communication



When asked to describe the most common topics during which communication barriers arise, 78 percent of respondents indicated information on how to use Calabasas Transit. This was followed by basic directions/instructions (44 percent), and how to pay the fare/ride (33 percent). Only three respondents said they had not experienced any language or communication barriers.

Of the two drivers surveyed, the number of unique LEP customers encountered during a typical week split between none and less than five. Customer service staff had more than half of the eight respondents indicating less than five, while two cited five to ten, and one said none. Respondents indicating five to ten encountered Spanish-speaking customers in addition to French-speaking, Chinese-speaking, and Vietnamese-speaking customers and contractors.

The survey also asked respondents regarding how their personal language capabilities impacted their ability to interact with Calabasas Transit customers. Four individuals indicated their personal language capabilities improved their ability to interact with Calabasas Transit customers, while four said it had no impact, and one said it hindered them. The individual that indicated their language capability hindered their ability cited English only as their spoken language. Three of the four respondents that noticed improved ability spoke another language other than English.

A copy of the staff survey instrument is provided in the Appendix.

**Factor 3: The nature and importance of the City’s transit services to affected LEP populations.**

In order to gain additional information about the importance of Calabasas Transit services to LEP communities, 26 local stakeholders (comprised of social service agencies, senior centers, faith-based organizations, and educational institutions) were contacted regarding the nature of the populations they serve. These stakeholders were selected because they were deemed likely to act as representatives for, or come into frequent contact with, LEP populations in Calabasas. Together, these stakeholders provided important insight into the City’s public transit service area’s key LEP groups. As representatives who serve as leaders for these communities, they are attuned to the needs and potential language barriers members

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

of these communities may face when using the Calabasas Transit System. Stakeholders marked with an asterisk (\*) returned a completed survey.

- Agoura Hills/Calabasas Community Center
- Belmont Village Senior Living\*
- Calabasas Klubhouse Preschool\*
- Calabasas Library
- Canyon Medical Center
- Calabasas Pediatrics
- Calabasas Presbyterian Church\*
- Calabasas Senior Center
- Chabad of Calabasas\*
- Church in the Canyon
- Conejo Las Virgenes Future Foundation
- Congregation Or Ami
- Connection a Caring Community
- Dr. Richard Grossman Boys & Girls Club
- Food Forward
- GAIA Foundation
- Global Kidney Health
- Las Virgenes Unified School District
- Montessori of Calabasas
- Montessori of Malibu Canyon\*
- Muse School
- Malibu Hindu Temple
- Options For Life Foundation
- Rotary Club of Calabasas
- Silverado Calabasas Memory Care Community
- Temple Aliyah
- The Calabasas Shul
- Valley Outreach Synagogue\*

Six organizations completed the requested survey. Of the six organizations, three provide faith-based services, two represent preschools, and one provides health services. Five organizations represent 50 or more members, while one represented 21 to 50 members in its organization.

English is the most common language encountered by stakeholders, with 100 percent of organizations having English-speaking clients or members. Farsi/Persian and Hebrew are the second most common, each cited by 67 percent of organizations, followed by Spanish and Russian (50 percent each), then French and Yiddish (33 percent each), and Chinese and Tagalog/Filipino (17 percent each).

Exhibit 6.14 Languages Spoken by Stakeholder Clientele/Members

Language	Frequency	Percentage
Chinese	1	17%
English	6	100%
Farsi/Persian	4	67%
French	2	33%
Hebrew	4	67%
Russian	3	50%
Tagalog/Filipino	1	17%
Spanish	3	50%
Yiddish	2	33%

The majority of stakeholders (67 percent) reported their non-native English speakers' ability to speak English as very well, with the exception of one organization citing their ability as somewhat well and another reporting not well. Three respondents indicated their non-native English speakers' ability to read English as very well, while one organization reported their ability as somewhat well, and another as not

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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well. The members of the organization that reported its members' ability to speak and read English as not well speak Farsi/Persian, Yiddish, Russian, and Hebrew.

Half of the respondents indicated their clients/members do not use Calabasas Transit, while one organization confirmed its members use the services. Two organizations were unsure of their members' use of Calabasas Transit services. None of these organizations were aware of any barriers to using public transit caused by a language barrier.

#### ***Factor 4: Resources available to the recipient for LEP outreach and the associated costs.***

As the section covering demographics demonstrates, no single LEP population is sufficiently large that the City must take measures to minimize language barriers. While the City may wish to provide staff, written materials, and online and phone services in other languages, it is not required to do so.

#### **Spanish- and Farsi-Speaking Staff**

According to the staff survey, there are four City employees that speak Spanish and one that speaks Farsi/Persian. The majority of these employees note these language skills are helpful in assisting non-English-speaking customers. In addition, one employee speaks Armenian.

*Cost: No additional cost anticipated.*

#### **Written Materials Translated into Other Languages**

Currently, no written materials have been translated into other languages. However, given the presence of communities that speak Spanish, Farsi/Persian, Chinese, and Russian, a sentence should be included on all Title VI documents in these languages stating, "If information is needed in another language, please call..." with the City's customer service phone number cited. Given the presence of Spanish- and Farsi-speaking City staff, information can likely be provided in those languages over the phone. Should the City determine it wishes to offer informational materials and the Title VI notice in other languages as a goodwill gesture, it will consider contracting with a professional translator.

*Cost: Depends upon language and amount of material to be translated.*

#### **Phone Services**

Current City staff (including drivers and other staff members likely to come into contact with transit customers) speak three languages other than English (Spanish, Persian/Farsi, and Armenian). While provision of interpretation services is not required due to the modest numbers of LEP persons, should a need be observed, the City may consider contracting with a live on-demand translation service (such as Telelanguage, Language Select, or LanguageLink). The telephonic interpretation service could be made available to all persons interacting with the City (not just related to transit), and will also allow for real-time assistance to customers at City Hall or those who call into the customer service phone number. Initial contact is made with a City employee who then determines if language assistance is required. The City employee dials the service, enters the appropriate PIN or code, and can reach a live translator for over 200 languages. As it is an on-demand service, the City would only pay for the minutes it actually uses.

*Cost: Estimated annual cost of \$711 or less. Assumes \$3.95 per minute for live translation and an average of 15 minutes of translation per month.*

#### **Web Services**

The City of Calabasas does not currently provide any translation of its website content. The City is posting all applicable Title VI documents and notices to its transit webpage as a part of this program. Should the

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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City desire to make the website available in additional language, it will consider use of a Google Translate widget on the page. This will provide access to the website for little cost.

*Cost: No additional cost anticipated.*

#### Event Interpretation

The City does not anticipate requiring translation at transit events. However, should a High Level outreach event regarding transit be held (e.g., a significant service change or elimination of service), the City will consider whether it is necessary to offer real-time interpretation in one or more languages. The City will provide an interpreter any time it receives a request to do so.

*Cost: Variable, depending upon languages needed and length and frequency of events.*

## Language Service Provision

### Interpretation Protocol

1. As discussed in the Service Area Demographics section, there are no LEP populations meeting the Safe Harbor threshold identified within Calabasas Transit System's service area using 2020 American Community Survey data, nor were any identified via outreach efforts as described in Chapter 5. As such, the City is not required to offer vital documents in any languages other than English.

In the staff survey, various staff indicated speaking Spanish, Farsi/Persian and Armenian. Given the prevalence of LEP individuals speaking Chinese, Russian, or other Indo-European languages, this may not be sufficient for effective communication with customers. Should additional language support be desired, the City may choose to engage an on-demand telephone interpretation service such as TeleLanguage, Language Select, or LanguageLink.

2. Real-time interpretation at public events is not generally required. However, should a need be expressed by a member of the community, the decision to provide interpretation will be determined on a case-by-case basis by examining several factors, such as:
  - The type and size of event,
  - The availability of a City staff member to interpret, or
  - The availability of a staff member of a host organization to interpret.

The City does not have an existing policy regarding real-time interpretation, and may use multi-lingual staff to translate when the need arises. For High Level public outreach events, where an express need has been identified, the City may choose to arrange for a professional interpreter through a local or regional service.

### Translation of Vital Documents

Based on the results of the Four Factor Analysis, the City is not required to translate any vital documents into other languages. However, per the results of the four-factor analysis, the City may consider providing Spanish, Farsi, and/or Chinese translations of its service brochure at City Hall and on its website. If service information is provided in Spanish, Farsi, or Chinese, Title VI notices will also be provided in those languages.

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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#### City of Calabasas Website

The Calabasas Transit System-specific web page is hosted on the City of Calabasas website. All Title VI documents will be posted and available for download on the City's transit web page. Any additional documents available in other languages should also be posted on the transit web page.

As an alternative to providing a translation of its transit web page, the City features the statement, "If information is needed in another language, please call..." (with the City's customer service phone number cited) in the Title VI section of its web page.

#### Monitoring, Evaluating, and Updating the LAP

A thorough review of this Language Assistance Plan will be undertaken every three years concurrent with updating and submitting the City's public transit Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in Calabasas Transit System language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan.

The City of Calabasas will regularly assess the effectiveness of how it communicates with LEP individuals by:

- Including questions about language assistance and information needs on any community surveys;
- Conversations with stakeholders, organizations, and entities which work with LEPs; and
- As-needed outreach with LEP groups.

Calabasas Transit System will monitor its language assistance efforts, including:

- Recording and reporting on customer service interactions with LEP individuals,
- Incorporating discussion of Title VI into regular operations meetings, and
- Updating the Language Assistance Plan based on feedback received.

#### Staff Training

Depending on what interpretation services are offered, the City may incorporate basic training on the use of such services, including:

- How to inform customers of language assistance resources,
- How to provide assistance to customers with Limited English Proficiency,
- Which staff members are key resources for various languages,
- How to use an on-demand telephone interpretation service (if implemented),
- How and when to document interactions with LEP customers, and
- How to respond to civil rights complaints.

#### Implementation Plan

The matrix below presents an implementation Plan for ensuring the Language Assistance Plan is quickly and efficiently implemented.



## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

Exhibit 6.15 Implementation Plan

Goal	Task	Anticipated Completion
Assess LEP population in the Calabasas Transit System service area	Four Factor Analysis	June 2022
	Stakeholder Survey	June 2022
	Driver/Staff Survey	June 2022
	Customer Survey	June 2022
	Demographics Analysis	June 2022
Develop Language Assistance Procedures	Develop Title VI Customer Service Procedures for Title VI complaints and concerns	FY 2023
	If desired, translate service brochure and Title VI notice into Spanish and Persian and post to the City's transit website	FY 2023
Staff Training	Train City transit staff regarding in-house language resources	FY 2023
	Train City staff regarding use of on-demand telephone interpretation service (if applicable)	FY 2023
	Train City staff regarding how and when to document interactions with LEP customers	FY 2023
	Train City Staff how to respond to civil rights complaints	FY 2023
Notification of Title VI Rights and Materials	Post Title VI notices in specified public locations	June 2022
Monitor and Update Language Assistance Plan	Assign administration of Title VI Program	June 2022
	Regularly review ACS and census demographic data	FY 2025
	Incorporate discussion of Title VI into regular staff meetings and trainings	FY 2023; ongoing

**2022 City of Calabasas Title VI Program**

**Calabasas Transit System**

July 2022

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## 7. Summary of Non-Elected Committee Membership

The City has a Traffic and Transportation Commission made up of five residents of the City of Calabasas who are appointed by members of the City Council. Commissioners are appointed for a term of two years and are voting members of the Commission. A high school student may also be appointed as a non-voting commissioner for a one-year term.

While the Traffic and Transportation Commission’s primary focus is on traffic and circulation within the city, it does monitor transit service improvements and consider recommendations specific to transit. As such, it has been included within the City’s Title VI Program.

A summary of the committee members reflective of ethnicity/race is provided below.

Exhibit 7.1 Non-Elected Committee Membership Table

Race/Ethnicity	Service Area Population (Percentage)	Commission (Percentage)
Caucasian	82.6%	100.0%
Hispanic/Latino	7.4%	0.0%
African American	0.9%	0.0%
Asian	9.9%	0.0%
Native American	0.1%	0.0%
Native Hawaiian	0.0%	0.0%

Given appointees are considered in part based on their familiarity with traffic and transportation topics, rather than simply a willingness to serve, this may result in less diversity within the Commission. Member participation and selection will be monitored by the City’s Title VI Program Administrator.

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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## 8. Fixed-Route Service Standards and Policies

The FTA requires all fixed-route transit providers to develop quantitative standards for all fixed-route modes of operation for the indicators listed below. Providers of public transportation may set additional standards as appropriate or applicable to the type of service they provide. Transit service standards are public rules and guidelines used to make decisions about where transit vehicles should run and how often.

The City has developed the following service standards.

### Vehicle load

Vehicle load is a capacity guideline that the number of passengers will not exceed the maximum load factor at the maximum load point in the prevailing direction. The City employs a maximum load standard of 1.5 of the total seated capacity. For example, if the seated capacity is 20, the standee capacity is 10, for a maximum loaded capacity of 30. The average of all loads during the peak operating period should not exceed the vehicle's capacities.

### Vehicle headway

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines.

Line 1 offers six trips each day, Monday through Friday. A full round-trip takes nearly two hours. As such, vehicle headway on this line is approximately every two hours.

Peak hour services (Lines 2-5) typically offer one trip during the morning peak period and one trip during the afternoon peak period. They are primarily designed to serve local schools, and schedules may vary by day per route to serve an individual school's late start or early release day. These seasonal routes are also subject to change in the summer and during the school year due to school and program schedules. Lines may be combined or eliminated based on demand, which is assessed prior to each summer and school year. Headways and trip durations for peak-hour routes are described below.

- Line 2 – in the morning, headways range from six minutes to 62 minutes, with the full trip taking between 20 minutes (partial trip) and 40 minutes. In the afternoon, when there is more than one trip, headways are approximately 25 minutes. The full trip takes 68 minutes.
- Line 3 – in the morning, there is a single trip which takes 45 minutes. In the afternoon, there are two trips Monday through Friday. One trip skips the high school and the round trip is approximately 30 minutes. The second trip originates at the high school and ends at the Mobile Home Estates, with a round trip of approximately 50 minutes.
- Line 4 – in the morning, there is a single trip which takes 25 minutes. In the afternoon, there is a single trip which takes 32 minutes.
- Line 5 – in the morning, there is a single trip which takes 45 minutes. In the afternoon, there is a single trip which takes 45 minutes.

The Calabasas Trolley offers service on Saturday, operating from 10 am to 3 pm and from 4 pm to 10 pm with one hour-headways.

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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#### On-time performance

The City's goal for the on-time performance of runs completed as scheduled is 95 percent. A trip is considered on-time if it leaves a stop no more than one minute before the scheduled departure time and no later than five minutes after the scheduled departure time.

#### Service availability

Service availability is a general measure of the distribution of routes within a transit provider's service area. The City's transit service area includes the area within the city limits of Calabasas. Approximately 71 percent of the City's residents live within one-quarter mile of a transit stop. The presence of a number of gated communities that are not served by the City's transit program contributes to this statistic.

Current operating hours:

- Line 1 – Monday through Friday, 6:30 a.m. – 6:00 p.m.
- Line 2 – Monday through Friday, 7:07 a.m. – 8:40 a.m. and 2:15 p.m. – 3:48 p.m. (a 12:30 p.m.-2:48 p.m. trip is offered on Wednesdays only).
- Line 3 – Monday through Friday, 7:15 am – 8:00 a.m. and 2:40 p.m. – 4:30 p.m. (except Wednesday, which operates 12:35 p.m. – 4:30 pm).
- Line 4 – Monday through Friday, 7:15 a.m. – 7:40 a.m. and 2:40 p.m. – 3:12 p.m. (except Wednesday, which operates 12:35 p.m. – 1:07 p.m.).
- Line 5 – Monday through Friday, 7:10 a.m. – 7:55 a.m. and 3:35 p.m. – 4:17 p.m.
- Calabasas Trolley – Saturday from 10:00 a.m. to 10:00 p.m., with no service between 3:00 p.m. and 4:00 p.m.

#### Vehicle assignment

It is the City's policy to equitably assign vehicles to each route and the City does not discriminate on assigning vehicles to routes. The City does take into account passenger volume and street design when assigning vehicles. The City's current vehicles are between three and 16 years old. Vehicles are rotated so that the same bus is not given a certain route for an extended period of time.

#### Distribution of transit amenities

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system.

Currently, transit amenities include bus stop signage, benches, and a modest number of shelters. For future amenity placements, the City will adhere to the following guidelines:

- All bus stops shall display a clearly visible sign denoting it as a Calabasas bus stop.
- Placement of shelters and benches will be based on stop usage.
  - Only the stops with the highest level of traffic will be considered for a shelter.
  - Benches will be placed at high traffic stops on an as-available basis.

## 2022 City of Calabasas Title VI Program

### Calabasas Transit System

July 2022

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#### Fare change policy

The City currently offers fare-free service on its Line 1 Shuttle and Trolley service. Riders on peak hour routes (Lines 2-5) may purchase a school year pass for \$134 or purchase \$1.00 tickets at city hall or via mail. Cash is not accepted onboard the fixed-route vehicles; all fares must be purchased in advance.

It is the policy of the City to engage the public in any fare change and address any adverse effects of those changes. Fare changes include both increases and decreases in fare types and cost of fare media. Promotional fare and temporary fare reductions for mitigating measures that are less than six months are exempt from this policy.

At a minimum, the City will:

- Develop and implement a public participation plan to engage underserved populations including minorities, low income, LEP, and the disabled;
- Provide a method for the public to provide comments on both the proposed fare changes; and
- Conduct a public hearing.

Proposed fare changes are subject to the approval of the Calabasas City Council.

#### Major service change policy

It is the policy of the City to engage the public in service changes. Service changes include both increases and decreases in service levels. A major service change is designated as any proposed change in route miles of 50 percent or greater on the service in question. This does not apply to the introduction of summer lines, unless those lines have changed more than 50 percent over the prior year.

At a minimum, the City will:

- Develop and implement a public participation plan to engage underserved populations including minorities, low income, LEP, and the disabled;
- Provide a method for the public to provide comments on both the proposed service changes; and
- Conduct a public hearing.

Proposed service changes are subject to the approval of the Calabasas City Council.

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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## **9. Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions**

The Calabasas Transit System does not have any subrecipients of Federal funding at this time and does not anticipate expanding to include subrecipients.

If in the future the City of Calabasas elects to expand its transit program and begins contracting with subrecipients, the City will ensure compliance with Title VI regulations by updating this element of its Title VI program to include the monitoring methodology and reporting schedules for all subrecipients.

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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## **10. Title VI Equity Analysis**

Title VI regulations require the completion of an Equity Analysis whenever a recipient or subrecipient begins planning the locating and construction of a new transit facility (not including bus shelters, transit stations, power substations, or other facilities already evaluated through NEPA).

The City of Calabasas has not undertaken any construction projects for facilities at a new location in recent years. Therefore, no Equity Analysis is required at this time.

If in the future the City of Calabasas begins planning for the development and construction of a new transit facility, the City will conduct an equity analysis prior to the selection of a construction site inclusive of the Title VI requirements below:

- a. The City of Calabasas shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The City shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis shall compare the equity impacts of various siting alternatives, and the analysis shall occur before the selection of the preferred site.
- b. When evaluating locations of facilities, the City shall give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis shall be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- c. If the City of Calabasas determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the City may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and when there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The City shall show how both tests are met. It is important to understand that in order to make this showing, the City shall consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The equity analysis of the development and construction of any such facility shall be completed and submitted as part of the City's subsequent Title VI program update.

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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## **11. City Council Adoption of Title VI Program**

Exhibit 11.1 City of Calabasas Adopting Resolution

**[Pending adoption by the Calabasas City Council]**

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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Appendix: Survey Instruments

Exhibit A.1 2022 Stakeholder Survey

<b>City of Calabasas / Calabasas Transit FTA Title VI Compliance Community Stakeholder Survey</b>			
1	Organization name:		
2	Type of Organization (example: healthcare, education, social services, faith-based, etc.):		
3	Your name/title:		
4	Contact information (email/phone):		
5	Approximate number of members/clients represented by your organization: <input type="checkbox"/> 1-10 <input type="checkbox"/> 11-20 <input type="checkbox"/> 21-50 <input type="checkbox"/> 51+		
6	What languages are spoken by members/clients in/represented by your organization? <input type="checkbox"/> English <input type="checkbox"/> French <input type="checkbox"/> Yiddish <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Spanish <input type="checkbox"/> Italian <input type="checkbox"/> Russian <input type="checkbox"/> Japanese <input type="checkbox"/> Tagalog/Filipino <input type="checkbox"/> Farsi/Persian <input type="checkbox"/> German <input type="checkbox"/> Armenian <input type="checkbox"/> Korean <input type="checkbox"/> Hebrew <input type="checkbox"/> Gujarati <input type="checkbox"/> Thai <input type="checkbox"/> Hungarian <input type="checkbox"/> Arabic <input type="checkbox"/> Other (specify): _____		
7	With respect to non-native English-speakers you come into contact with, how would you characterize their ability to...  <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <i>Speak English?</i>  <input type="checkbox"/> Not well  <input type="checkbox"/> Somewhat well  <input type="checkbox"/> Very well  <input type="checkbox"/> I don't know                             </td> <td style="width: 50%; vertical-align: top;"> <i>Read English?</i>  <input type="checkbox"/> Not well  <input type="checkbox"/> Somewhat well  <input type="checkbox"/> Very well  <input type="checkbox"/> I don't know                             </td> </tr> </table>	<i>Speak English?</i> <input type="checkbox"/> Not well <input type="checkbox"/> Somewhat well <input type="checkbox"/> Very well <input type="checkbox"/> I don't know	<i>Read English?</i> <input type="checkbox"/> Not well <input type="checkbox"/> Somewhat well <input type="checkbox"/> Very well <input type="checkbox"/> I don't know
<i>Speak English?</i> <input type="checkbox"/> Not well <input type="checkbox"/> Somewhat well <input type="checkbox"/> Very well <input type="checkbox"/> I don't know	<i>Read English?</i> <input type="checkbox"/> Not well <input type="checkbox"/> Somewhat well <input type="checkbox"/> Very well <input type="checkbox"/> I don't know		
8	Do members/clients of your organization utilize City of Calabasas public transit services? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know		
9	With respect to non-native English-speakers, does language present a barrier to their use of the City's public transit services? <input type="checkbox"/> Yes ( <i>please answer Question 10</i> ) <input type="checkbox"/> No <input type="checkbox"/> I don't know		
10	Which language(s) other than English do these members/clients speak most commonly?		

Thank you for your participation. Please return your completed survey by June 17, 2022. Either use the enclosed postage-paid envelope OR scan and email to [Kathy@moore-associates.net](mailto:Kathy@moore-associates.net) (Please indicate "Calabasas Community Stakeholder Survey" in the subject line).

City of Calabasas / Calabasas Transit
FTA Title VI Compliance – City Staff Survey

- 1. All staff: Please list the languages you speak.
2. All staff: With respect to transit customers, please indicate the most common languages you encounter other than English. (check all that apply)
3. For drivers: In a typical week, how many unique riders board your vehicle that either do not speak English or do not speak English very well?
4. For customer service staff: In a typical week, how many individuals do you interact with that either do not speak English or do not speak English very well?
5. For all staff: How would you rate your ability to communicate with individuals who do not speak English or do not speak English very well?
6. For all staff: How do your personal language capabilities impact your ability to interact with Calabasas Transit customers?
7. For all staff: In your opinion, what type of materials/services would be of most benefit to the City's transit riders who do not speak English or do not speak English very well?
8. For all staff: In terms of language/communication barriers, please identify the most common areas or topics (specific to Calabasas Transit riders). Is it...?
9. For all staff: For data collection purposes only, please include your first name, position, and department below.

Please return the completed to survey to Tra'a Bezdecny, Assistant Engineer, 818-224-1673 or tbezdecny@cityofcalabasas.com, no later than June 15, 2022. You may also email your scanned survey to kathy@moore-associates.net (please put "Calabasas Staff Survey" in your subject line). Thank you for your input.





CITY of CALABASAS

Thank you for participating in today's survey. Your feedback will help the City of Calabasas update its Title VI Plan, which ensures equal access to public transit services regardless of race, color, or national origin.

1. What route/service are you currently riding?

- Line 1
- Line 2
- Line 3
- Line 4
- Line 5
- Trolley
- Dial-A-Ride

2. How did you pay your fare today?

- Free fare (Line 1 and Trolley only)
- Transit pass
- Transit ticket
- Cash (Dial-A-Ride only)
- Other (specify): \_\_\_\_\_

3. What types of trips do you typically take using Calabasas Shuttle, Trolley, or Dial-A-Ride? (Select up to three)

- Work
- School
- Healthcare
- Shopping
- Entertainment/recreation/social activities
- Personal business/errands
- Other (specify) \_\_\_\_\_

4. How would you travel if Calabasas Shuttle, Trolley, or Dial-A-Ride were not available? (select only one)

- I would drive myself
- I would walk, ride a bicycle, or use another form of active transportation
- I would get a ride with someone
- I would take a taxi, Uber, or Lyft
- I would not make the trip

5. What is the primary language spoken in your home? (Select only one)

- English
- Spanish
- Persian/Farsi
- Russian
- Chinese
- Korean
- Other (specify): \_\_\_\_\_

6. How well do you speak English?

- Very well or native speaker
- Less than very well
- Not at all

7. Have you or has anyone you know had difficulty using Calabasas Shuttle, Trolley, or Dial-A-Ride due to a language barrier?

- No
- Yes – please explain in the box below:

8. What is your annual household income?

- \$15,000 or less
- \$15,001 - \$19,999
- \$20,000 - \$29,999
- \$30,000 - \$39,999
- \$40,000 - \$49,999
- \$50,000 - \$74,999
- \$75,000 - \$99,999
- \$100,000 +

9. How many individuals (including yourself) live in your household?

- 1
- 2
- 3
- 4
- 5
- 6 or more

10. What is your race/ethnicity? (check all that apply)

- White
- Middle Eastern or North African
- African American/Black
- Hispanic/Latino
- Asian
- Native American/Alaska Native
- Native Hawaiian/Pacific Islander
- Other (specify) \_\_\_\_\_

Thank you for your participation!

**2022 City of Calabasas Title VI Program**

Calabasas Transit System

July 2022

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