

**CITY OF CALABASAS
CALABASAS TRANSIT SYSTEM
2016 Title VI Program**

Developed September 2016

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."

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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, color, and 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, and 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, color, and 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.
- 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.

2016 City of Calabasas Title VI Program

Calabasas Transit System

November 2016

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	www.cityofcalabasas.com/departments/traffic/shuttle.html
City Hall	100 Civic Center Way, Calabasas
Gelson's Market	22277 Mulholland Highway, Calabasas
Tennis and Swim Center	23400 Park Sorrento, Calabasas
Calabasas and Agoura Hills Community Center	27040 Malibu Hills Rd, Calabasas
De Anza Park	3701 Lost Hills Rd, 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.

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, color, and 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, 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.

Within 10 business days of receiving the complaint, the City's Title VI Program Administrator (City of Calabasas' Assistant Transportation Planner) 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.			

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.

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, and 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
Active Investigations				
XXX				
XXX				
Lawsuits				
XXX				
XXX				
Complaints				
XXX				
XXX				

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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 revisions¹ 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.

¹ "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.

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.²
- 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.

² 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.

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, 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 FTA Title VI Circulars (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.

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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 (September 2016) 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 13 surveys were completed. Additional information on the survey findings may be found in Chapter 6. The survey instrument may be found in the Appendix.
- Stakeholder Survey – In September 2016 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 17 organizations were contacted and 11 surveys were completed. Additional information on the survey findings may be found in Chapter 6. The survey instrument may be found in the Appendix.

Stakeholders responding to the survey included Chabad of Calabasas, Temple Aliyah, Calabasas Pediatrics, The Calabasas Shul, Montessori of Calabasas, Church in the Canyon, Canyon Medical Center, Calabasas Senior Center, Calabasas Klubhouse Preschool, Calabasas Library, and Calabasas Rotary Club. Other stakeholders invited to take the survey included Congregation Or Ami, Las Virgenes Unified School District, Muse School, Montessori of Malibu Canyon, Viewpoint School, and Malibu Hindu Temple.

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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 September 2016 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:

Ms. Hali Aziz-Goktapeh
Assistant Transportation Planner
City of Calabasas
100 Civic Center Way
Calabasas, CA 91302
(818) 224-1673

Email: hazizgoktapeh@cityofcalabasas.com

Additional information regarding the Title VI Program is available at:

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 five peak-hour routes Monday through Thursday, 6:30 a.m. to 7:10 a.m. and 1:00 p.m. to 1:40 p.m. The City also offers a weekend shuttle service that operates Saturday between 10:00 a.m. and 10:00 p.m., and Sunday between 12:00 p.m. and 4:00 p.m. Two Dial-A-Ride vehicles are available during regular service hours which are 7:30 a.m. to 4:30 p.m.

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

Exhibit 6.1 Calabasas Transit System Fleet Inventory

Number	Make	Year	Pax	WC	Length	Fuel	Mileage as of July 2016
1	FORD	2003	20	2	20'	GAS	244,038.00
2	FORD	2003	20	2	20'	GAS	265,778.00
3	FORD	2003	20	2	20'	GAS	240,411.00
4	FORD	2003	34	2	34'	GAS	268,972.00
5	CHEV	2005	30	2	30'	DIESEL	200,895.00
6	EL DOR	2005	30	2	30'	DIESEL	151,163.00
7	EL DOR	2006	16	2	16'	GAS	249,750.00
8	FORD	2009	30	NA	30'	GAS	109,017.00
9	FORD	2009	30	NA	30'	GAS	127,143.00

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:

- 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
- Persian
- Russian
- Chinese

The American Community Survey 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	18,351	76.0%	2,711,665	27.2%	14,905,601	39.2%
Black or African American	519	2.1%	802,132	8.0%	2,155,929	5.7%
Asian	2,121	8.8%	1,377,333	13.8%	5,062,736	13.3%
Native Hawaiian/Pacific Islander	9	0.0%	23,921	0.2%	136,464	0.4%
American Indian/Alaska Native	34	0.1%	18,207	0.2%	145,736	0.4%
Some other race alone	137	0.6%	24,807	0.2%	81,869	0.2%
Two or more races	1,384	5.7%	215,647	2.2%	1,044,136	2.7%
Hispanic or Latino	1,591	6.6%	4,800,491	48.1%	14,534,449	38.2%
Total	24,146	100.0%	9,974,203	100.0%	38,066,920	100.0%

*ACS 2014 five-year estimates

The American Community Survey data presents language spoken at home for persons five years of age and older. ACS 2014 estimates revealed approximately 71.6 percent of Calabasas Transit System service area residents spoke only English at home, while approximately 2.4 percent spoke Persian, making it the most commonly spoken language other than English found within the service area. In comparison, less than one percent of both Los Angeles County and the State of California spoke Persian (0.3 percent and 0.2 percent, respectively). The next most cited language spoken at home was Spanish with 1.0 percent and Chinese with 0.7 percent.

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	23,118	--	9,329,565	--	35,545,621	--
Total Speak Only English	16,545	71.6%	4,032,116	43.2%	19,992,432	56.2%
Total Speak Language Other than English	6,573	28.4%	5,297,449	56.8%	15,553,189	43.8%
Total Speak English "very well"	21,569	93.30%	6,922,537	74.20%	28,756,407	80.90%
Total Speak English less than "very well"	1,549	6.70%	2,407,028	25.80%	6,789,214	19.10%
Speak English Less Than "Very Well" - Breakdown						
Speak Persian	553	2.4%	30,391	0.3%	74,437	0.2%
Speak Spanish	227	1.0%	1,656,302	17.8%	4,490,408	12.6%
Speak Chinese	157	0.7%	212,843	2.3%	610,934	1.7%
Speak Russian	148	0.6%	26,589	0.3%	73,133	0.2%

*ACS 2014 five-year estimates

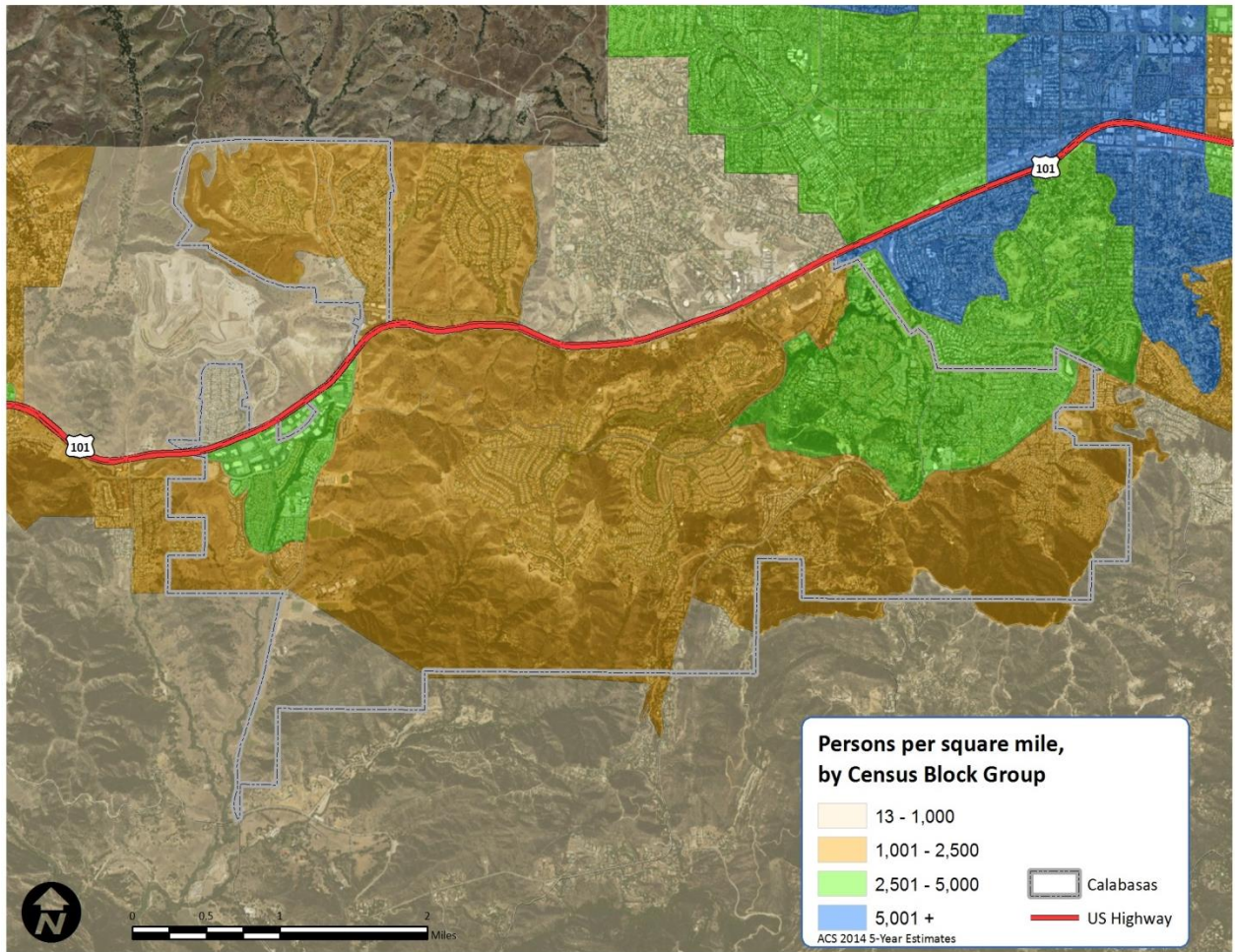
Demographics by Census Block Group

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 24,000 people in the Calabasas Transit System service area lives in the western communities of Deer Springs, Malibu Creek, Stone Creek, Lone Oak, and the Colony, as well as in the eastern communities of Calabasas Village, Calabasas Ridge, Calabasas Park, Bellagio, Clairidge, Las Villas Calabasas, and Greater Mulwood.

Exhibit 6.4 Total Population by Census Block Group



Race/Ethnicity

The 2014 American Community Survey reveals the White population makes up the largest group at 76 percent, followed by Asian at 8.8 percent. Persons of Hispanic or Latino heritage comprise approximately 6.6 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 group within Calabasas. Both racial/ethnic groups are concentrated on the western portion of the City in the communities of Deer Springs, Malibu Creek, Stone Creek, Lone Oak, and the Colony.

Exhibit 6.5 Asian Population by Census Block Group

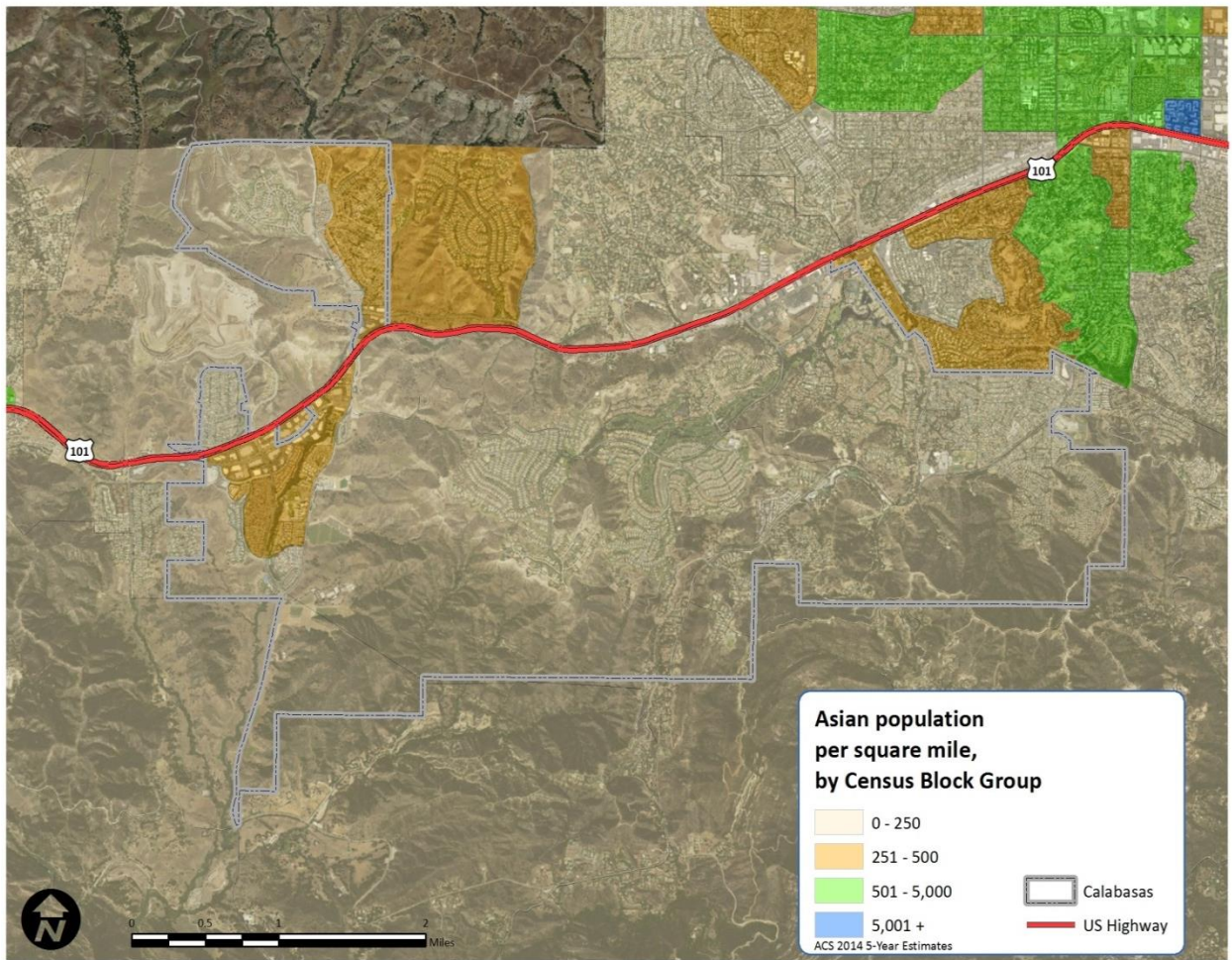
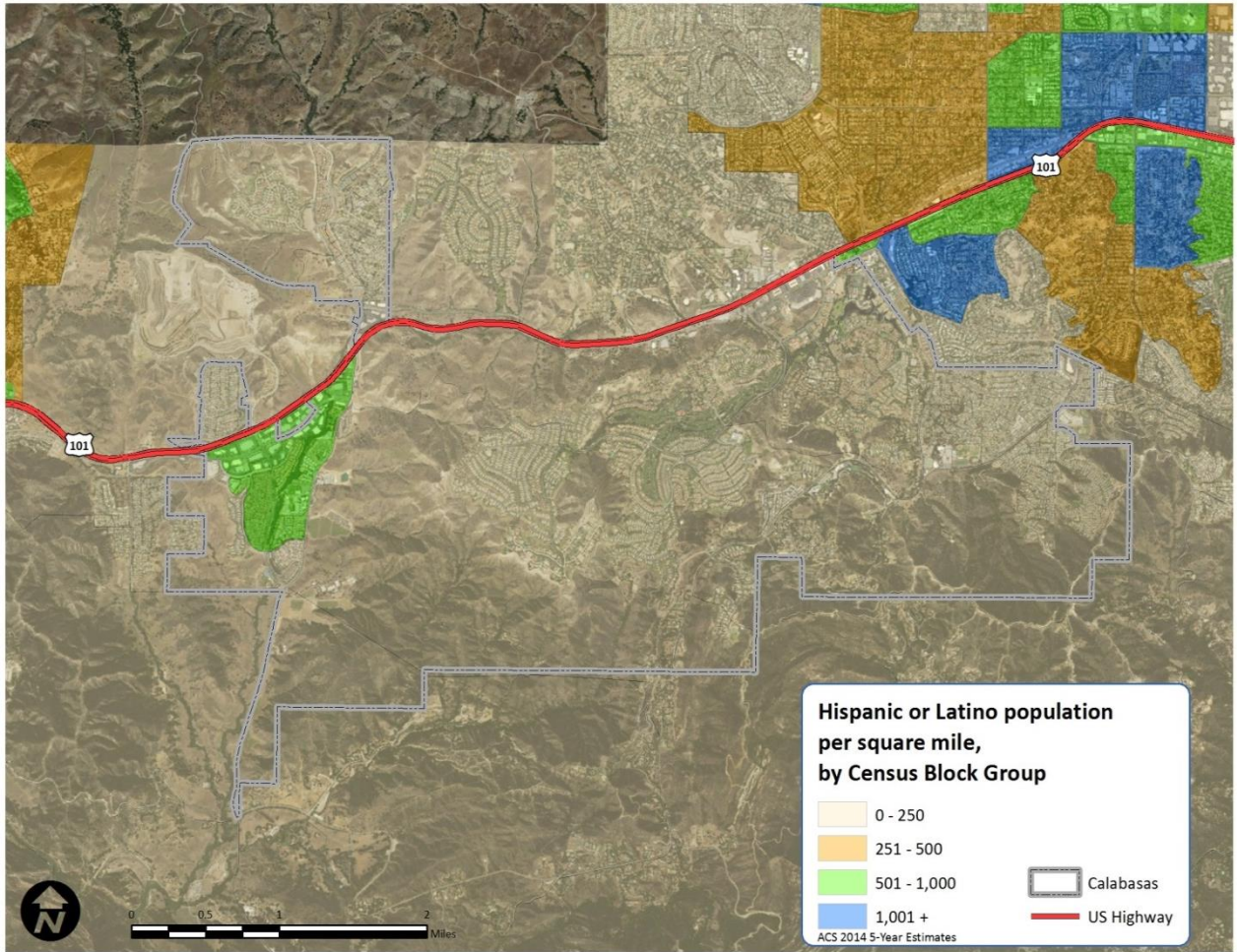


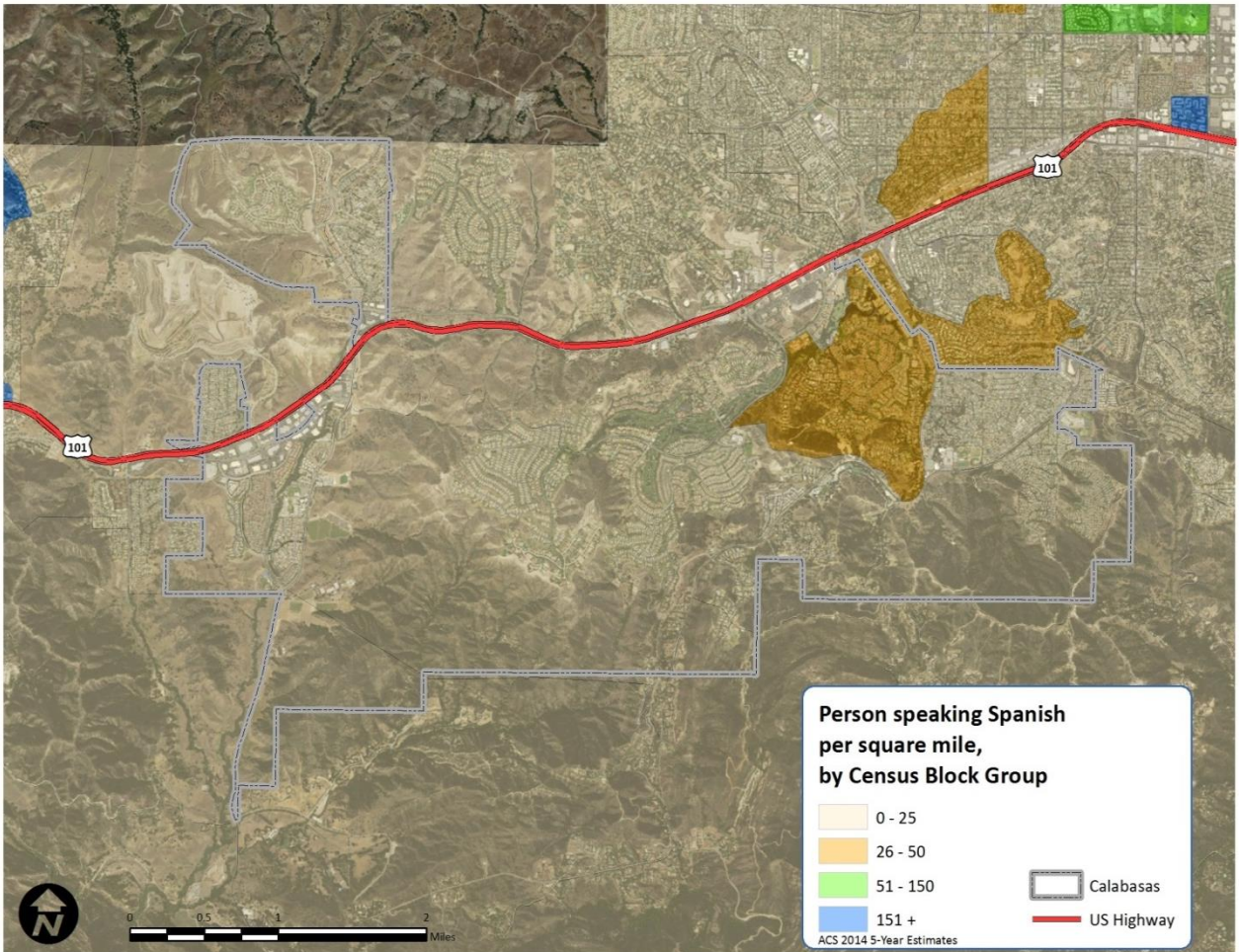
Exhibit 6.6 Hispanic or Latino Population by Census Block Group



LEP Populations
Spanish-Speaking

Exhibit 5.7 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 1,220 Spanish speakers in the service area, of which 227 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 6.7 Spanish-Speaking Population by Census Block Group

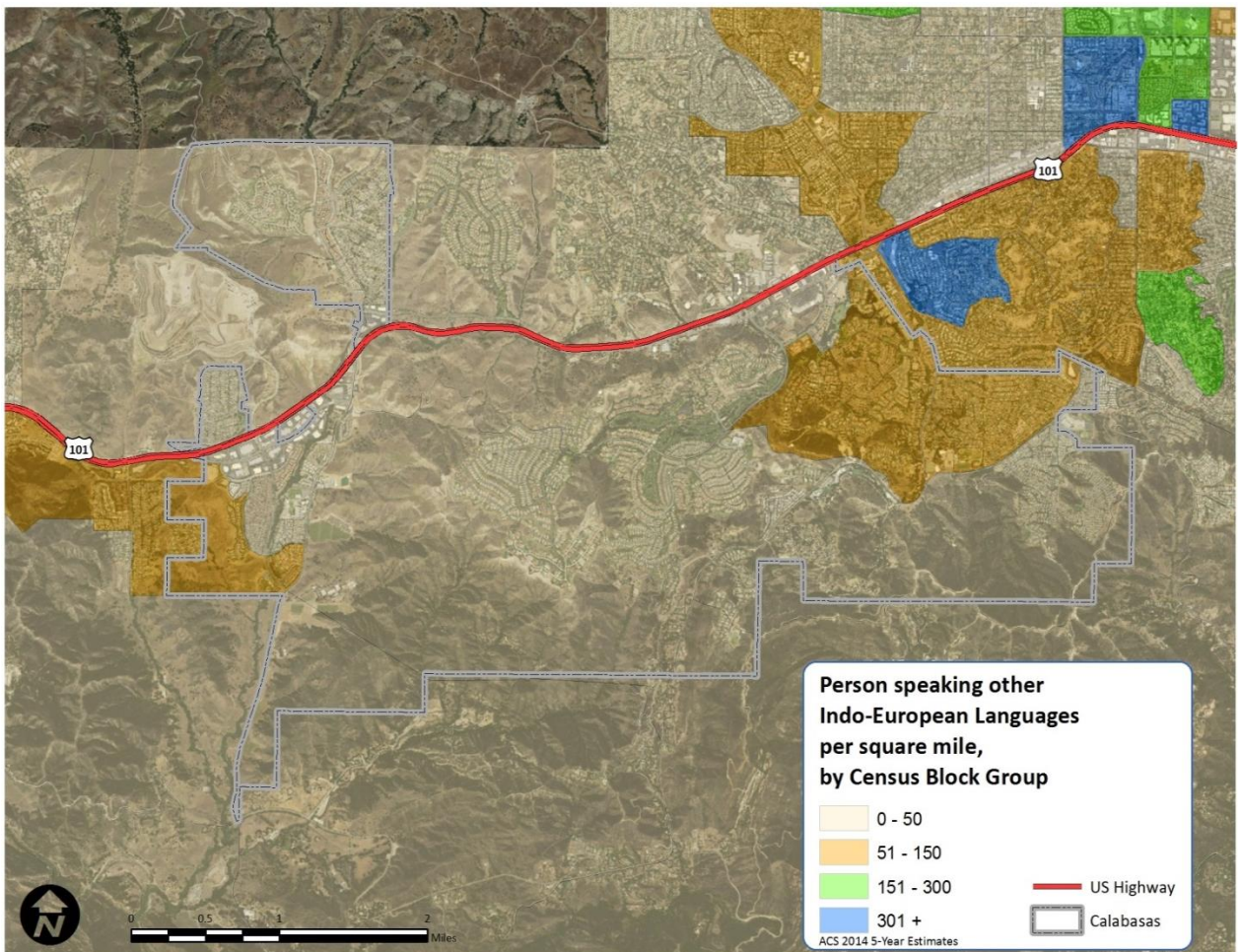


Other Indo-European Language-Speaking

Exhibit 5.8 presents the distribution of people who do not speak English “very well” but speak other Indo-European languages at home in the Calabasas Transit service area. Some of the other languages that make up Other Indo-European Languages are French, Italian, Greek, Russian, and Persian.

Given there are 1,926 Persian speakers in the service area, of which 553 speak English less than “very well,” Title VI does not require the City to provide vital documents in Persian under the Safe Harbor provision.

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

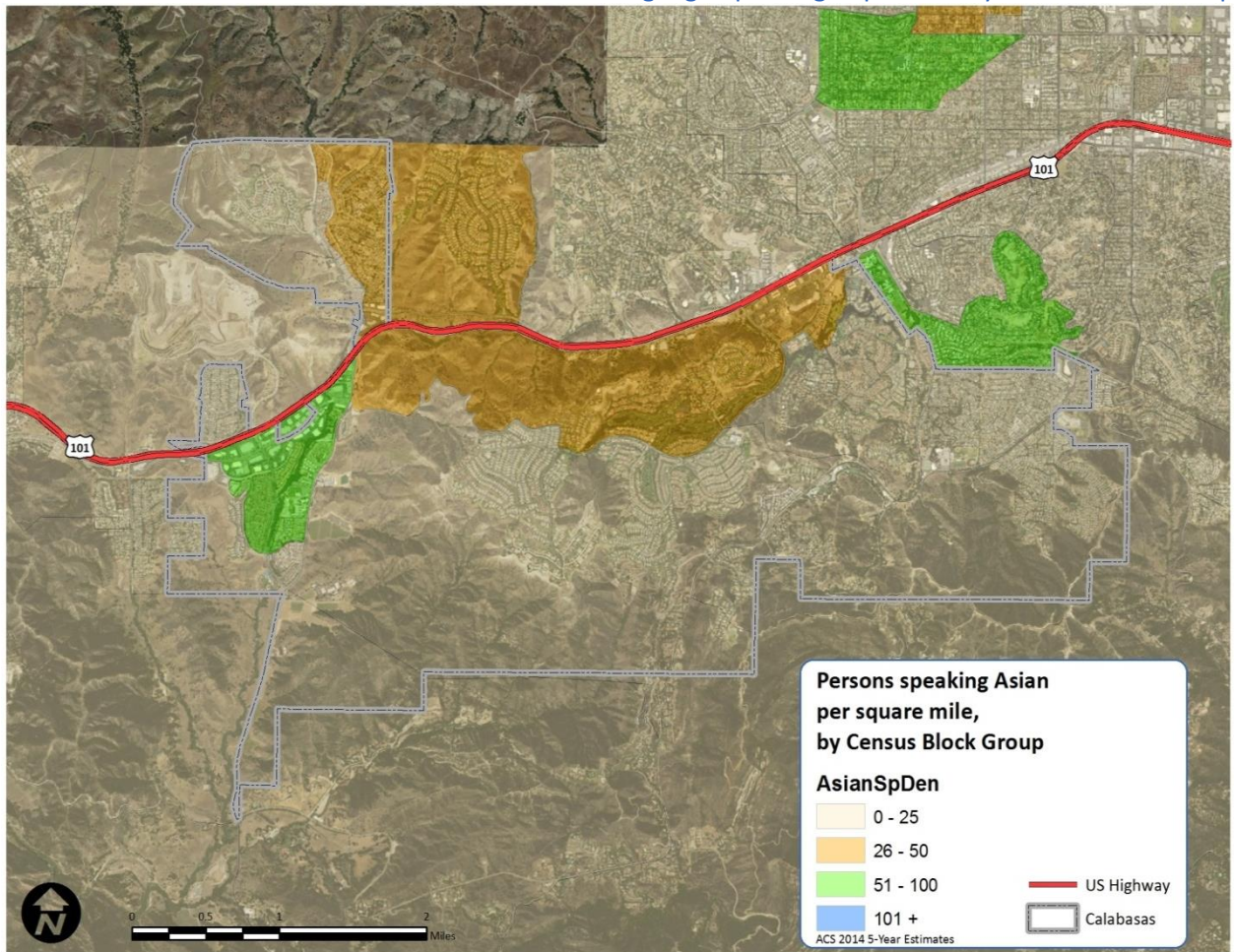


Asian Language-Speaking

Exhibit 5.9 presents the distribution of people who do not speak English “very well” but speak Asian languages at home in the Calabasas Transit service area.

There are 397 Chinese speakers in the service area, of which 157 speak English less than “very well.” There are also 290 Korean speakers in the service area, of which 138 speak English less than “very well.” Title VI does not require the City to provide vital documents in either of these languages under the Safe Harbor provision.

Exhibit 6.9 Asian Language-Speaking Population by Census Block Group



As discussed in the Service Area Demographics section, the two largest LEP populations in the Calabasas Transit System service area are identified as speaking Persian or Spanish. As of the 2014 ACS, there were 553 Persian speakers, comprising 2.4 percent of the service area population, who reported speaking English less than “very well.” There were also 227 Spanish speakers, comprising 1.0 percent of the service area population, who reported speaking English less than “very well.”

Given the size of these populations, the Safe Harbor Provision does not apply to the Persian-speaking or Spanish-speaking populations of 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 the populations of Persian- or Spanish-speaking LEP persons rise above 1,000, the City will need to provide the translation services and written documents translated into Persian as listed above.

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/.

The City accessed the available EL data for the 2015/2016 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 2014 American Community Survey, the highest concentrations of EL students within Calabasas speak Farsi (Persian), Spanish, Hebrew, or Russian. 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 School English Learner (EL) Population

	Farsi (Persian)	Spanish	Hebrew	Russian	Armenian	Mandarin	French	Other non-English languages	Total English Learners	Total School Population
Bay Laurel Elementary School	25	12	18	17	2	4	1	15	94	600
Chaparral Elementary School	26	17	20	9	8	2	2	14	98	640
Lupin Hill Elementary School	11	23	11	17	3	3	4	40	112	603
Alice C. Stelle Middle School	12	7	13	2	0	0	1	7	42	790
Arthur E. Wright Middle School	6	13	2	2	1	1	2	5	32	875
Calabasas High School	14	6	6	4	0	3	3	11	47	1903
Total all Calabasas Schools	94	78	70	51	14	13	13	92	425	5,411
Percentage of Calabasas Student Population	1.74%	1.44%	1.29%	0.94%	0.26%	0.24%	0.24%	1.70%	7.85%	100.00%
All Las Virgenes USD	134	257	116	73	19	24	21	158	802	11,374
Percentage of LVUSD Student Population	1.18%	2.26%	1.02%	0.64%	0.17%	0.21%	0.18%	1.39%	7.05%	100.00%

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, City staff and drivers were surveyed regarding their customer interactions. As drivers and customer service staff are typically on the "front lines" and most frequently come into contact with transit patrons, their observations and insights provide an informative picture of how many LEP persons use the Calabasas Transit System.

Data from the 13 completed City staff/driver surveys generally corroborate the findings described in the Service Area Demographics section, though observations indicated Spanish speakers to be the largest LEP population among Calabasas Transit System customers, followed by those speaking Farsi/Persian. Specific highlights from the driver survey are detailed below.

- More than half (66.7 percent) of drivers indicated transporting at least five unique passengers per week that either do not speak English or do not speak English very well.
- More than half (53.8 percent) of City staff surveyed indicated having occasional problems when communicating with individuals who do not speak English or do not speak English very well.
- All but two City staff indicated that their personal language capabilities either improve or have no impact on their ability to communicate with Calabasas transit riders.
- When asked what materials/services would be of most benefit to riders who do not speak English or do not speak English well, 62 percent of all City staff indicated translated service brochures would be most beneficial, followed by translated online materials (22.2 percent).
- The two most common areas/topics indicated by all City staff to have language/communication barriers were how to use the Calabasas Transit System, and basic directions/instructions.

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

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

To better understand the Calabasas Transit System's role among LEP populations, 17 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. Of the groups contacted, 11 completed our stakeholder survey (survey instrument is provided in the Appendix). 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 of these communities may face when using the Calabasas Transit System.

- Nearly three-quarters of all stakeholders (72.7 percent) reported having clients or members who were Spanish speakers. Other languages spoken by clients or members include Persian/Farsi (54.5 percent), Russian (36.4 percent), and Hebrew (36.4 percent).
- When stakeholders come into contact with non-native English-speakers, in all instances, the non-native English-speakers spoke English either somewhat well or very well. When asked how well non-native English-speakers read English, over 80 percent of

- stakeholders indicated non-native English-speakers were able to read English either somewhat well or very well.
- Stakeholders were also asked about the City of Calabasas transit usage of their members or clients. More than half (55 percent) indicated their clients or members do not use City transit services. Of those clients or members who do use transit, less than 25 percent are non-native English speakers.
 - Overall, stakeholders indicated language as not being a barrier to using City of Calabasas' transit services for non-native English-speakers. However, some stakeholders believe lack of knowledge or access to schedules and information regarding the City's transit service to be the major 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 Persian-Speaking Staff

According to the staff survey, there is one City employee that speaks Spanish and one that speaks Persian. Each of these employees notes these language skills are helpful in assisting non-English-speaking customers.

Cost: No additional cost anticipated.

Written Materials Translated into Other Languages

Currently, no written materials have been translated into other languages. Given the concentration of Spanish- and Persian-speaking residents, a sentence should be included on all Title VI documents stating, "If information is needed in another language, please call..." with the City's customer service phone number cited. Should the City determine it wishes to offer informational materials and the Title VI notice in Spanish or Persian 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 five languages other than English (Spanish, Persian, Assyrian, Armenian, and Turkish). While provision of interpretation services is not necessary 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 services, the City would only pay for the minutes it actually uses.

Cost: Estimated annual cost of \$1,422 or less. Assumes \$3.95 per minute for live translation and an average of 30 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 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 2014 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 driver and staff survey, various staff indicated speaking Spanish, Armenian, Assyrian, Farsi (Persian), and Turkish. Given both most common non-English languages in the service area are spoken by staff members, this may be sufficient for 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 Persian or Spanish. However, per the results of the driver and staff survey in Section 6A, the City may consider

providing Spanish and Persian translations of its service brochure at City Hall and on its website. If service information is provided in Spanish and Persian, Title VI notices will also be provided in Spanish and Persian.

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 should prominently feature the statement, "If information is needed in another language, please call..." (with the City's customer service phone number cited) on 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.

Exhibit 6.11 Implementation Plan

Goal	Task	Anticipated Completion
Assess LEP population in the Calabasas Transit System service area	Four Factor Analysis	September 2016
	Stakeholder Survey	September 2016
	Driver/Staff Survey	September 2016
	Demographics Analysis	September 2016
Develop Language Assistance Procedures	Develop Title VI Customer Service Procedures for Title VI complaints and concerns	FY 2017
	If desired, translate service brochure and Title VI notice into Spanish and Persian and post to the City's transit website	FY 2017
Staff Training	Train City transit staff regarding in-house language resources	FY 2017
	Train City staff regarding use of on-demand telephone interpretation service (if applicable)	FY 2017
	Train City staff regarding how and when to document interactions with LEP customers	FY 2017
	Train City Staff how to respond to civil rights complaints	FY 2017
Notification of Title VI Rights and Materials	Post Title VI notices in specified public locations	October 2016
Monitor and Update Language Assistance Plan	Assign administration of Title VI Program	September 2016
	Regularly review ACS and census demographic data	FY 2017; ongoing
	Incorporate discussion of Title VI into regular staff meetings and trainings	FY 2017; ongoing

7. Summary of Non-Elected Committee Membership

The Calabasas Transit System does not include a non-elected committee or advisory body to assist with the transit program.

If in the future a non-elected committee or advisory body is established, a summary of the committee members reflective of ethnicity/race, and a description of efforts made to encourage the participation of minorities on the said committee will be provided in this section utilizing the table below.

Exhibit 6.1 Sample Non-Elected Committee Membership Table

Race/Ethnicity	Service Area Population (Percentage)	Committee/Council (Percentage)
Caucasian	XX.X%	XX.X%
Hispanic/Latino	XX.X%	XX.X%
African American	XX.X%	XX.X%
Asian	XX.X%	XX.X%
Native American	XX.X%	XX.X%

Member participation and selection will be monitored by the City's Title VI Program Administrator.

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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 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 2-6) 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. Line 2 serves some stops with two trips per morning and evening peak period. Headways for peak-hour routes are described below.

- Line 2 – in the morning, headways range from 20 minutes (partial trip) to 40 minutes; in the afternoon, the full trip takes just over one hour.
- Line 3A – each trip takes approximately 35 minutes.
- Line 3B – each trip takes approximately 30 minutes.
- Line 4A – the morning trip takes approximately 25 minutes, while the afternoon trip takes approximately 30 minutes.
- Line 4B – each trip takes approximately 25-30 minutes.
- Line 5 – the morning trips take approximately 30 minutes, while the afternoon trips take approximately 45 minutes.
- Line 6 – the morning trip takes 20 minutes, while the afternoon trips take approximately 25 minutes.

Summer schedules offer similar geographic coverage as the regular peak hour lines but still offer one trip in the morning and one in the afternoon.

The Calabasas Trolley offers service on Saturday and Sunday. Saturday service operates from 10 am to 3 pm and from 4 pm to 10 pm with one hour headways, and Sunday service operates from 12 pm to 4 pm with 15-minute headways.

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 am – 6:00 pm.
- Line 2 – Monday through Friday, 7:07 am – 8:40 am and 2:15 pm – 3:48 pm (a 12:30 pm trip is offered on Wednesdays only).
- Line 3A – Monday through Friday, 7:10 am – 7:45 am and 2:40 pm – 3:17 pm (except Wednesday, which operates 12:35 pm – 12:58 pm).
- Line 3B – Monday through Friday, 7:30 am – 8:00 am (Thursday also runs from 7:50 am – 8:20 am) and Monday through Thursday, 3:20 pm – 3:47 pm; Friday runs from 2:45 pm – 3:12 pm.
- Line 4A – Monday through Friday, 7:25 am – 7:50 am.
- Line 4B – Monday through Friday, 7:30 am – 7:53 am (Thursday also runs from 7:50 am – 8:13 am) and Monday through Thursday, 3:15 pm – 3:42 pm; Friday runs from 2:45 pm – 3:12 pm.
- Line 5 – Monday through Friday, 7:10 am – 7:55 am (except Thursday, which runs from 7:50 am – 8:30 am) and Monday through Thursday, 3:15 pm – 3:57 pm; Friday runs from 2:45 pm – 3:27 pm.
- Line 6 – Monday through Friday, 7:30 am – 7:50 am and Monday through Thursday, 2:55 pm – 3:19 pm (except Wednesday, which runs from 12:40 pm – 1:04 pm).
- Calabasas Trolley – Saturday from 10 am to 10 pm, with no service between 3 pm and 4 pm; Sunday from 12 pm to 4 pm.

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 10 and 13 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.

Fare change policy

The City currently offers fare-free service on its Line 1 Shuttle and Trolley service. Riders on peak hour routes (Lines 2-6) may purchase an annual pass for \$80 or purchase \$1.00 tickets at city hall and the Calabasas and Agoura Hills Community Center. A summer transit pass is also available for \$50; it is valid for Summer Lines 2-5 and the Calabasas Beach Bus. Cash is not accepted onboard the 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.

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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.

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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, and 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, and 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, and 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, and 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.

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11. City Council Adoption of Title VI Program

Exhibit 11.1 City of Calabasas Adopting Resolution

RESOLUTION NO. 2017-1545

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CALABASAS, CALIFORNIA, ADOPTING THE 2016 CITY OF CALABASAS TITLE VI PROGRAM IN COMPLIANCE WITH FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS.

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d *et seq* and 49 CFR Part 21, the U.S. Department of Transportation and the Federal Transit Administration prohibit discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance; and

WHEREAS, as a recipient of FTA funding, the City of Calabasas is required to implement a Title VI Program that demonstrates the City's commitment to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color, or national origin.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF CALABASAS AS FOLLOWS:

SECTION 1. The City Council of the City of Calabasas hereby adopts the proposed Title VI program, titled City of Calabasas Transit System Title VI Program. The Title VI Program will be conducted in compliance with all requirements imposed by or pursuant to the FTA regulations, including but not limited to 49 CFR Part 21.

SECTION 2. The Title VI Program includes, but is not limited to, the following contents:

- Title VI complaint filing procedures, forms, and records of any Title VI-related investigations, complaints, or inquiries;
- A Public Participation Plan identifying policies for public hearings, workshops and comment periods that encourage public input regarding fare increases or major service changes, and engage minority and limited English proficient populations in the public planning process;
- Environmental justice and service equity policies;
- Efforts to ensure sub-recipient compliance with Title VI requirements; and
- Transit service standards and policies related to vehicle load, headway, on-time performance, service availability, distribution of transit amenities, and vehicle assignment.

SECTION 3. The City Clerk shall certify to the adoption of this resolution and shall cause the same to be processed in the manner required by law.

PASSED, APPROVED AND ADOPTED this 26th day of April, 2017.



Mary Sue Maurer, Mayor

ATTEST:



Maricela Hernandez, MMC
City Clerk

APPROVED AS TO FORM:


Dave Fleishman, Assistant City Attorney
Colantuono, Highsmith & Whatley

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) §
CITY OF CALABASAS)

I, **MARICELA HERNANDEZ, MMC**, City Clerk of the City of Calabasas, California, **DO HEREBY CERTIFY** that the foregoing resolution, being **Resolution No. 2017-1545** was duly adopted by the City Council of the City of Calabasas, at their regular meeting held April 26, 2017, and that it was adopted by the following vote, to wit:

AYES: Mayor Maurer, Mayor pro Tem Gaines, Councilmembers Bozajian, Shapiro and Weintraub.

NOES: None.

ABSTAIN: None.

ABSENT: None.



Maricela Hernandez, MMC
City Clerk
City of Calabasas, California

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Appendix: Survey Instruments

Exhibit A.1 2016 Stakeholder Survey

**City of Calabasas / Calabasas Transit System
FTA Title VI Compliance
Stakeholder Survey**

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 in/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: _____
7	With respect to non-native English-speakers you come into contact with, how would you characterize their ability to... <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 transit services? <input type="checkbox"/> Yes (<i>please answer Question 9</i>) <input type="checkbox"/> No (<i>skip to Question 10</i>) <input type="checkbox"/> I don't know (<i>skip to Question 10</i>)
9	Approximately what percent of current transit riders are non-native English-speakers? <input type="checkbox"/> Less than 25 percent <input type="checkbox"/> 25 to 50 percent <input type="checkbox"/> 51 to 75 percent <input type="checkbox"/> More than 75 percent
10	With respect to non-native English-speakers, does language present a barrier to their use of the City of Calabasas' transit program? <input type="checkbox"/> Yes (<i>please answer Question 11</i>) <input type="checkbox"/> No <input type="checkbox"/> I don't know
11	Which language(s) other than English do these members/clients speak?

Thank you for your participation. Please return your completed survey by faxing it to 661.253.1208 or email your scanned survey to Kathy@moore-associates.net. Please return your survey no later than September 9, 2016.

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

1. For all staff: Please indicate all languages you speak.

2. 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? *Please count unique riders only. If you encounter the same rider multiple times during the week, only count them once.*
 None Less than 5 5 to 10 More than 10

3. For drivers: Are the riders observed in Question 2 typically boarding and/or getting off in specific areas of the city? If so, please indicate where below.
 Origin locations/areas: _____
 Destination locations/areas: _____

4. For all staff: With respect to transit customers, please indicate the most common languages you encounter other than English. (check all that apply)
 Spanish French Yiddish Chinese Vietnamese
 Farsi/Persian Italian Russian Japanese Tagalog/Filipino
 Hebrew German Armenian Korean Other: _____
 Gujarati Thai Hungarian Arabic No languages other than English

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?
 No issues or problems Occasional problems Frequent problems

6. For all staff: How do your personal language capabilities impact your ability to interact with Calabasas transit riders?
 They improve my ability to communicate. They hinder my ability to communicate.
 Not applicable/no impact.

7. For all staff: In your opinion, what type of materials/services would be of most benefit to riders who do not speak English or do not speak English very well?
 Translated service brochure Onboard notices in other languages
 Translation services through call center/dispatch Translated online materials
 Common phrases cards (translated into various languages)
 Other: _____

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...?
 How to use the Calabasas Transit System How to pay for the Calabasas Transit System
 Basic directions/instructions Other: _____

9. For all staff: For data collection purposes only, please include your name, position, and department below.
 Name/Position: _____
 Department: _____

Please return the completed to survey to Hali Aziz-Goktapeh, Assistant Transportation Planner, 818-224-1673, no later than Monday, September 12, 2016. Thank you for your input.