

RESOLUTION NO. 2024-4273

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MOORPARK, CALIFORNIA, ADOPTING AN UPDATED TITLE VI PLAN FOR MOORPARK CITY TRANSIT AND RESCINDING RESOLUTION NO. 2021-4021

WHEREAS, the City of Moorpark/Moorpark City Transit (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 or national origin as protected by Title VI of the Civil Rights Act of 1964 as amended; and

WHEREAS, the City is a subrecipient of Federal revenues and is required to meet Federal Regulatory requirements for Title VI of the Civil Rights Act of 1964, established by the Code of Federal Regulations part 21.7; and

WHEREAS, the City assures that all residents and visitors are afforded meaningful access to the City's programs, activities and services; and

WHEREAS, on July 7, 2021, the City Council adopted Resolution No. 2021-4021, adopting certain elements of the VCTC 2021 Title VI Program and rescinding Resolution No. 2019-3840; and

WHEREAS, an update Title VI Program Plan, attached hereto as Exhibit A, has been prepared and presented to City Council on September 18, 2024.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF MOORPARK DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The update to the Title VI Program covering Fiscal Years 2024/25 to 2026/27 is hereby adopted.

SECTION 2. Resolution No. 2021-4021 is hereby rescinded upon the effective date of this resolution adopting an updated Title VI Program Plan.

SECTION 3. The City Clerk shall certify to the adoption of this resolution and shall cause a certified resolution to be filed in the book of original resolutions.

PASSED AND ADOPTED this 18th day of September, 2024.

ATTEST:


Ky Spangler, City Clerk

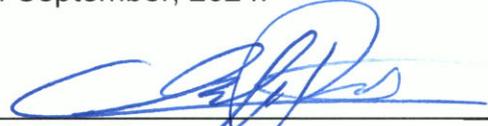

Chris R. Enegren, Mayor



Exhibit A: City of Moorpark/Moorpark City Transit Title VI Program Plan

**CITY OF MOORARK
MOORPARK CITY TRANSIT
2024 Title VI Program**

(Fiscal Years 2024/25 to 2026/27)

Final Report

August 2024

Adopted by the Moorpark City Council
September 18, 2024

Prepared by
Moore & Associates, Inc.
25852 McBean Pkwy #187
Valencia, CA 91355
888.743.5977



The City of Moorpark operates fixed-route, Dial-a-Ride, and on-demand bus service throughout Moorpark with stops at key locations throughout the city.

This document was prepared by Moore & Associates, Inc., on behalf of the City of Moorpark. It has been adopted by the City of Moorpark 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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Section 1 | Introduction

The City of Moorpark/Moorpark City Transit Policy Statement

The City's transit services, commonly known to the public as Moorpark City Transit, are in compliance with FTA Title VI requirements.

Title VI states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The FTA is required to ensure federally supported transit services and related benefits are provided consistent with Title VI.

For the City of Moorpark, this means no person or group of persons will be discriminated against with regard to fares, 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 the City's vehicles assigned to routes, quality of the transit facilities serving the City, and location of routes will not be determined on the basis of race, color, or national origin.

The City of Moorpark (inclusive of Moorpark City Transit and MCT On Demand) ensures that its programs, policies, and activities comply with Department of Transportation's (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 FR 74087, December 14, 2005). The City is committed to creating and maintaining a public transportation system that is free of all forms of discrimination. The City will take necessary preventive corrective and disciplinary actions to stem behavior that violates this policy or the rights and privileges it is designed to protect. FTA requires recipients to documents compliance with DOT Title VI regulations by submitting a Title VI Program once every three years.

Environmental Justice Requirements

The City of Moorpark shall integrate an environmental justice analysis into its National Environmental Protection Act (NEPA) documentation of construction projects. For projects where NEPA documentation is not required, the City of Moorpark will prepare an environmental assessment (EA) or environmental impact statement (EIS) assessing potential disparate impact and disproportionate burden when performing construction projects. The EA or EIS will integrate into its documents the following components:

- A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, direct observation, or a public involvement process);
- A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations;
- A discussion of all positive effects of the project that would affect the identified minority and low-income populations, such as improvements in transit service, mobility, or accessibility;



- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project;
- A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

In addition, the State of California, through the California Environmental Quality Act (CEQA), requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. When NEPA documents are prepared, the City will also comply with CEQA regulations.

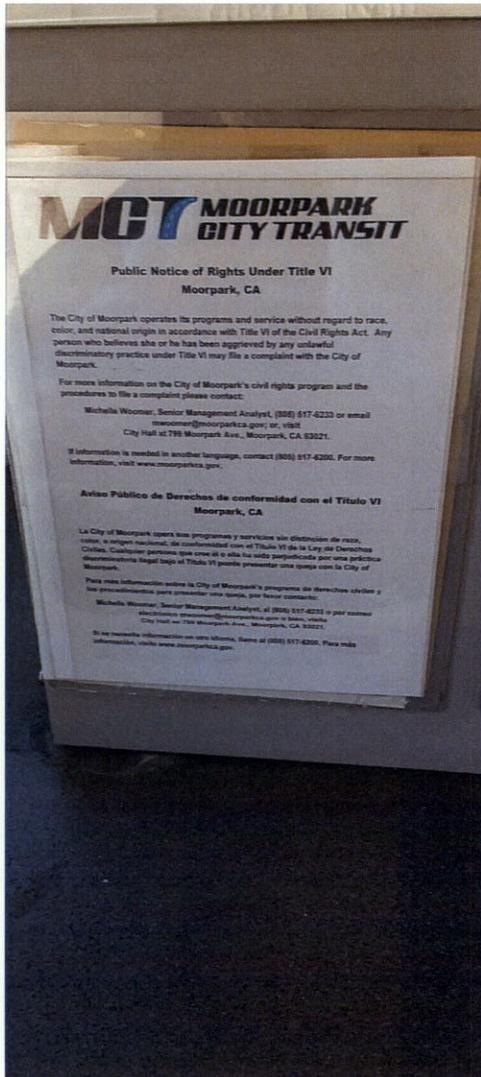


Section 2 | Title VI Notice to the Public and Locations Where Displayed

The City of Moorpark’s Title VI Notice to the Public is currently posted at the locations listed in Exhibit 2.1.

Exhibit 2.1 List of Locations Where Title VI Notice Is Posted

Location	Address
Moorpark City Transit buses and vans	----
City of Moorpark display case located next to entrance to Development Services Building	799 Moorpark Avenue, Moorpark, CA 93021
City of Moorpark website	www.moorparkca.gov/transit





Title VI Notice to the Public

Exhibit 2.2 Title VI Notice to the Public



**Public Notice of Rights Under Title VI
Moorpark, CA**

The City of Moorpark operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Moorpark.

For more information on the City of Moorpark's civil rights program and the procedures to file a complaint, please contact:

Michelle Woomer, Senior Management Analyst, (805) 517-6233 or email
mwoomer@moorparkca.gov; or visit
City Hall at 799 Moorpark Ave., Moorpark, CA 93021.

If information is needed in another language, contact (805) 517-6200. For more information, visit www.moorparkca.gov.

**Aviso Público de Derechos de conformidad con el Título VI
Moorpark, CA**

La Ciudad de Moorpark opera sus programas y servicios sin distinción de raza, color, o origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que creee que él o ella ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con la Ciudad de Moorpark.

Para más informacion sobre la programa de derechos civiles de Ciudad de Moorpark y los procedimientos para presentar una queja, por favor contacto:

Michelle Woomer, Senior Management Analyst, (805) 517-6233 or email
mwoomer@moorparkca.gov; or visit
City Hall at 799 Moorpark Ave., Moorpark, CA 93021.

Si su necesita información en otro idioma, llame al (805) 517-6200. Para más informacion, visite www.moorparkca.gov.



Exhibit 2.3 Title VI Notice to the Public (Online)

The screenshot shows the Moorpark California website with a navigation menu and a sidebar. The main content area is titled "Title VI Civil Rights Public Information" and includes the following text:

Title VI

Civil Rights Public Information

City of Moorpark Title VI Notice to the Public

The City of Moorpark (City) operates its Moorpark City Transit programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, as amended. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City.

For additional information on the City's civil rights program and procedures to file a complaint, call 805-517-6233, visit www.moorparkca.gov/transit, or write to City of Moorpark, Michelle Woomer, Senior Management Analyst, 799 Moorpark Avenue, Moorpark, CA 93021.

In addition to the Title VI complaint process at the City, a complainant may file a Title VI complaint with the Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20560.

For information pertaining to Title VI Civil Rights Public Information, view the [Title VI Civil Rights Public Information Form](#). To report a complaint, view the [Title VI Civil Rights Complaint Form](#) (English and Spanish). The City's Title VI Program is available [here](#).

Ciudad de Moorpark Título VI Aviso al Público

La Ciudad de Moorpark (Ciudad) opera sus programas y servicios sin consideración de raza, color, u origen nacional, de conformidad con Título VI de la Ley de Derechos Civiles de 1964, en su forma enmendada. Cualquier persona que cree que el o ella haya sido agraviado por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con la Ciudad.

Para obtener información adicional sobre el programa de derechos civiles de Ciudad y los procedimientos para presentar una queja, llame al 805-517-6233, visite www.moorparkca.gov/transit o escriba a Ciudad, Michelle Woomer, Senior Management Analyst, 799 Moorpark Avenue, Moorpark, CA 93021.

Además del Título VI proceso de Ciudad, un reclamante puede presentar una queja del Título VI con la Administración Federal de Tránsito, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20560.

Para obtener información relacionada con la Información Pública de Derechos Civiles del Título VI, consulte el [Formulario de Información Pública de Derechos Civiles del Título VI](#). Para presentar una queja, consulte el [Formulario de Queja de Derechos Civiles del Título VI](#) (inglés y español). El Programa de Título VI de la Ciudad está disponible [aquí](#).



Exhibit 2.4 Title VI Complaint Forms (Online)

MCT On Demand

- [Public Meetings](#)
- [Parks & Recreation](#)
- [Moorpark City Library](#)
- [Notify Me](#)
- [Report a Concern](#)

Avenue, Moorpark, CA 93021.

In addition to the Title VI complaint process at the City, a complainant may file a Title VI complaint with the Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

For information pertaining to Title VI Civil Rights Public Information, view the [Title VI Civil Rights Public Information Form](#). To report a complaint, view the [Title VI Civil Rights Complaint Form](#) (English and Spanish). The City's Title VI Program is available [here](#).

Ciudad de Moorpark Titulo VI Aviso al Público

La Ciudad de Moorpark (Ciudad) opera sus programas y servicios sin consideración de raza, color, u origen nacional, de conformidad con Título VI de la Ley de Derechos Civiles de 1964, en su forma enmendada. Cualquier persona que cree que el o ella haya sido agraviado por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con la Ciudad.

Para obtener información adicional sobre el programa de derechos civiles de Ciudad y los procedimientos para presentar una queja, llame al 805-517-6233, visite www.moorparkca.gov/transit o escriba al Ciudad, Michelle Woomer, Senior Management Analyst, 799 Moorpark Avenue, Moorpark, CA 93021.

Además del Título VI proceso de Ciudad, un reclamante puede presentar una queja del Título VI con la Administración Federal de Tránsito, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Para obtener información relacionada con la Información Pública de Derechos Civiles del Título VI, consulte el [Formulario de Información Pública de Derechos Civiles del Título VI](#). Para presentar una queja, consulte el [Formulario de Queja de Derechos Civiles del Título VI](#) (inglés y español). El Programa de Título VI de la Ciudad está disponible [aquí](#).

Moorpark City Hall
799 Moorpark Avenue
Moorpark, CA 93021
Ph: 805-517-6200

City Hall Hours

Monday - Thursday
7:30 AM - 1:00 PM Walk-in Service
1:00 PM - 4:30 PM Appointments Only
4:30 PM - 5:30 PM Phone/Online Only

Friday (Closed Alternating Fridays)
8:00 a.m. - 1:00 p.m. Walk-in Service
1:00 p.m. - 4:00 p.m. Appointments Only
4:00 p.m. - 5:00 p.m. Phone/Online Only

[Check Fridays at www.moorparkca.gov/hours]

Helpful Links

- Virtual Counter
- Staff Directory
- Municipal Code
- Library Catalog
- Job Opportunities
- Accessibility/ADA Info
- Content/Link Policy
- Copyright Notices

Select Language ▼



Section 3 | Title VI Complaint Procedures and Forms

Title VI Complaint Procedure and Form

As part of the City of Moorpark's commitment to ensuring that no person is discriminated against based on race, color, or national origin. To ensure compliance with 49 CFR Section 21.9 (b), the City has developed its Civil Rights Policy which includes procedures for investigation and tracking Title VI complaints. City policy is to investigate complaints that are filed in writing within 180 days from the date of the alleged discrimination in which the complainant alleges discrimination on the basis of race, color, or national origin. Each complaint alleging discrimination based on race, color, or national origin is categorized as a Title VI complaint and investigated according to the City's Title VI Complaint Procedure. Translated versions of the procedure and complaint form can be accessed by clicking the links located on the Title VI Program webpage (<https://www.moorparkca.gov/233/Title-VI>).

How to File a Complaint

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination based on their race, color, or national origin may file a Title VI complaint with VCTC. The complaint must be filed within 180 days of the date of the alleged discrimination. Written complaints may be sent to:

City of Moorpark
Attn: Michelle Woomer, Senior Management Analyst
799 Moorpark Ave.
Moorpark, CA 93021

Or by email to mwoomer@moorparkca.gov.

The Title VI Complaint Form is available online at <https://www.moorparkca.gov/233/Title-VI> in English and Spanish and should be used to detail the complaint, but is not mandatory. Complaint forms may also be obtained by calling (805) 517-6200.

In addition to the City's Title VI complaint process, a complainant may file a Title VI complaint with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

If a complaint is made in a language other than English, City staff will translate the complaint and if staff is unable to perform the translation, City staff have the ability to receive translations through a contracted service, and any response, including requests for additional information and any disposition will be made in both English and the language in which the complaint was made.

Complaint Procedures

All complaints alleging discrimination based on race, color or national origin in a transit service or benefit provided by the City of Moorpark will be recorded by the City's Senior Management Analyst by updating the "List of Active Investigations, Lawsuits, or Complaints." This list shall include the date of the



investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or subrecipient in response to the investigation, lawsuit, or complaint. The list shall be made available to FTA upon request and with every City of Moorpark Title VI Program update.

If additional information is needed for assessment or investigation of the complaint, City staff will contact the complainant in writing within fifteen (15) working days of receiving the complaint. Failure of the complainant to provide the requested information by the requested date may result in the administrative closure of the complaint.

City staff will investigate a formal Title VI complaint within thirty (30) working days of receiving the complaint. Based upon all the information received, City staff will prepare a draft written response.

The City will determine if the complaint may be administratively closed after the draft is written, or if a final written response is needed. If a final written response is needed, the City will send the response to the complainant and advise the complainant of his/her right to file a complaint externally. The complainant also will be notified of the action in writing and advised of their right to appeal the response to federal and state authorities as appropriate.

The City of Moorpark will use its best efforts to respond to a Title VI complaint within sixty (60) working days of its receipt. Draft letters to complainants are provided in Attachment A.



Exhibit 3.1 Title VI Complaint Procedures (English)



Title VI Civil Rights

Moorpark City Transit (MCT) 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, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

- No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that MCT furnishes, on the basis of race, color, or national origin.
- Frequency of service, age and quality of vehicles assigned to routes, quality of bus stops and location of routes will not be determined on the basis of race, color or national origin.

In addition, MCT recognizes both California and federal laws which protect your civil rights. The California Legislature has adopted statutes to address discrimination in the private as well as the public sector. California and federal law should be examined together. People who believe that they have experienced discrimination or have been denied other rights may file a complaint with California's Department of Fair Employment and Housing (DFEH). (www.dfeh.ca.gov).

For a detailed analysis of the legal rights of disabled individuals, please refer to California's Office of the Attorney General. (<http://oag.ca.gov>).

Para la información en español llama por favor 805-517-6245.

TITLE VI INFORMATION

For additional information on MCT's obligation regarding non-discrimination, please write to:

City of Moorpark
Moorpark City Transit
799 Moorpark Avenue
Moorpark, CA 93021

HOW TO FILE A COMPLAINT

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a Title VI complaint with MCT. The complaint should be submitted by the complainant or his/her designee as soon as possible but must be filed within 180 days of the date of the alleged discrimination. For information on how to file a complaint, contact MCT by any of the methods provided below.



Mail:

City of Moorpark
Moorpark City Transit
799 Moorpark Avenue
Moorpark, CA 93021

Phone:

805-517-6233

Fax:

805-532-2555

Email:

mwoomer@moorparkca.gov

In addition to the Title VI complaint process at MCT, a complainant may file a Title VI complaint with the Federal Transit Administration (FTA), Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839 (http://www.fta.dot.gov/civil_rights.html). The FTA's complaint procedure is contained in the FTA Circular C4702.1A.

HOW FEDERAL TITLE VI COMPLAINTS ARE PROCESSED BY MCT

All complaints alleging discrimination based on race, color or national origin in a transit service or benefit provided by MCT will be investigated promptly. MCT will acknowledge in writing the receipt of the complaint within ten (10) working days. Based upon the receipt of all information required, the investigation will normally be completed with ninety (90) days of receipt. In some cases MCT may submit a written request to the complainant to provide additional information. Receipt of additional relevant information may expand the timing of the complaint resolution.

The Moorpark City Manager will determine if the complaint may be administratively closed or if a final written response is needed. If a final written response is needed, MCT will send the response to the complainant. The written response will notify the complainant that there were violations and that efforts are underway to correct them or that the file will be closed because the investigation did not uncover any violations.

The complainant also will be advised of his/her right to appeal the response to federal and state authorities as appropriate. The individual's right to a prompt and equitable resolution of a complaint will not be impaired by his/her pursuit of other remedies. The use of this grievance process is not a prerequisite to the pursuit of other remedies.



Exhibit 3.2 Title VI Complaint Form (English)



Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The requested information will assist us in processing your complaint. Please let us know if you require any assistance in completing this form.

Complete and return this form to: Moorpark City Transit, 799 Moorpark Avenue, Moorpark, CA 93021.

1. Complainant's Name _____
2. Address _____
3. City _____ State _____ Zip Code: _____
4. Telephone Number (home) _____ (business) _____
5. Person discriminated against (if someone other than the complainant)
 - Name _____
 - Address _____
 - City _____ State _____ Zip Code: _____
6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:
 - a. Race/Color: Yes No
 - b. National Origin: Yes No
7. What date did the alleged discrimination take place?



8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes No

If yes, check each box that applies:

Federal agency Federal court State agency

State court Local agency

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

Name _____

Address _____

City _____ State _____ Zip Code: _____

Telephone Number _____

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

Complainant's Signature _____ Date _____



Exhibit 3.3 Title VI Complaint Form (Spanish)



Título VI Forma de Quija

El Título VI de los derechos civiles de 1964 exige que "Ninguna persona en los Estados Unidos, por motivos de raza, color o origen nacional, ser excluido de la participación en, ser negado los beneficios de, o ser objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financier federal."

La información solicitada es necesaria para asistimos en el procesamiento de su queja. Por favor avisenos si usted requiere ayuda en completar esta forma.

Complete y devuelva esta forma a: Moorpark City Transit, 799 Moorpark Avenue, Moorpark, CA 93021.

1. Nombre del reclamante: _____

2. Dirección _____

3. Ciudad _____ Estado _____ Código Postal _____

4. Número de teléfono (casa) _____ (negocio) _____

5. Persona de discriminación (si alguien que no sea el reclamante):

Nombre _____

Dirección _____

Ciudad _____ Estado _____ Negocio: _____

6. ¿Cuál de las siguientes opciones describe mejor la razón usted que la discriminación ocurrió? ¿Fue debido a su?:

a. Raza/Color: Sí No

b. Origen Nacional: Sí No

7. ¿Qué fecha ocurrió la supuesta discriminación?



8. En sus propias palabras, describa la supuesta discriminación. Explique lo que ocurrió y a quien usted cree que fue responsable. Por favor use otra página (o atrás de la forma) si se necesita espacio.

9. ¿Ha presentado esta queja con cualquier otra agencia gubernamental, o con algún tribunal federal o estatal? Sí No

Si la respuesta es sí, marque cada caja que se aplica:

agencia federal tribunal federal organismo estatal

tribunal estatal agencia local

10. Por favor proporcione la información sobre una persona de contacto en la agencia o tribunal donde la queja fue presentada.

Nombre _____

Dirección _____

Ciudad _____ Estado ____ Código Postal: _____

Número de teléfono _____

11. Por favor firme abajo. Usted puede incluir cualquier material escrito o otra información que usted cree es pertinente a su queja.

Firma del Reclamante

Fecha



Section 4 | List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

As a recipient of Federal funds, the City of Moorpark is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part. In accordance with FTA Title VI Regulations, this list must include details regarding:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the City of Moorpark.

The City of Moorpark has not been involved in any transit-related Title VI investigations, complaints or lawsuits during the period covered by the prior Title VI Program (FY 2022 – FY 2024). The City’s Senior Management Analyst will continue to maintain a list of any Title VI investigations, complaints, and lawsuits and include a summary and description of actions taken by the City, as required by the Title VI regulations. The list will include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken in response, or final findings related to the investigation, lawsuit, or complaint. The list (shown in Exhibit 4.1) will be included in the City’s Title VI submittal every three years.

Exhibit 4.1 Title VI Investigations, Lawsuits, and Complaints Summary Table

Record of Title VI Complaints, Investigations and Lawsuits				
	Date	Summary	Status	Actions Taken
Investigations				
1.		None		
2.				
3.				
Lawsuits				
1.		None		
2.				
3.				
Complaints				
1.		None		
2.				
3.				



Section 5 | Public Participation Plan

Introduction

Moorpark is an attractive city of 36,073 residents (American Community Survey 2022 Five-Year Estimates) in a productive area of Ventura County. The City, which comprises 12.44 square miles, is surrounded on all sides by flatlands and mesas. It is divided by State Route 118 and is located 15 minutes from Thousand Oaks and 30 minutes from Ventura.

Moorpark boasts a low crime rate, an award-winning school district, quality residential homes, and a historic downtown; and continues to foster its goal of maintaining a vibrant and diversified community.

Moorpark City Transit is operated under contract with the City of Thousand Oaks, which contracts with MV Transportation for its fixed route and dial-a-ride services. Additionally, MCT On Demand is operated under contract with First Transit. The present services include a local dial-a-ride service within the City limits, intercity dial-a-ride services for travel outside City limits, an on-demand micro-transit, and two fixed routes that operate within city limits. All City transit services operate Monday through Friday.

The City recognizes the importance and necessity of the public participation process. The Moorpark city council sets the overall policy for the transit system. There are five city council members. The council meets on the first and third Wednesday of each month at 6:30 p.m. at the Community Center Apricot Room (799 Moorpark Avenue, Moorpark).

All meetings of the Moorpark city council are open to the public. Members of the public may request time on the agenda of the Moorpark city council to comment on specific subjects of interest to the councilmembers. A minimum of three weeks advance notice should be given for requested agenda time. Additional subcommittees and working groups may be appointed at any time by the Mayor to address specific transportation-related topics or areas of interest to the City.

Purpose of the Plan

This Public Participation Plan was adapted from the Plan created by the Ventura County Transportation Commission (VCTC) in support of its Title VI Program. In prior years, as a subrecipient to VCTC, the City of Moorpark incorporated VCTC's Public Participation Plan as part of its own Title VI Program. In 2024, the City adapted VCTC's Public Participation Plan to better reflect the needs of the City of Moorpark. This plan includes strategies for engaging minority and Limited English Proficient (LEP) individuals in the City's transit-related planning efforts to ensure all groups are represented and their needs considered.

Public Participation Process

Approach to Public Participation

The public participation process should be considered at the earliest stages of any transit project that may impact the community, transit riders, and potential transit riders. The public participation process and extent of public participation varies for each project. The following sections outline tools and strategies to ensure that public input is invited and all foreseeable impacts to the community are considered.



At the beginning of a project, City staff will identify appropriate and effective strategies and develop an approach. For contracted projects, the Request for Proposal (RFP) requirements and criteria for scoring proposals will include the development of that project's public participation process.

Outreach Requirements and Activities

The following activities are intended to serve as guidelines for minimum levels of outreach to ensure that all residents, transit riders, and potential transit riders have equal access and opportunity to participation in transit planning and decision-making. These also provide strategies for soliciting input and engaging various communities, including racial minorities and LEP individuals.

Minimum Outreach Requirements

1. Notices for public events may include posters, email blasts to community stakeholders, notifications through the City's Notify Me program, media releases to local newspapers, social media content, and radio announcements (if funding allows).
2. Notices will be posted one week prior to the event.
3. Notices will be posted at City Hall, on buses, and at major transfer locations.
4. Notices will be posted on the City's website at www.moorparkca.gov.
5. Comments will be accepted at public events, by mail, by email, and by phone.

Outreach Methods to Engage Minority and Limited English Proficient Populations

1. The City will produce transit informational materials in English and Spanish.
2. The City will develop and post notices in English and Spanish.
3. The City will cultivate relationships with community groups and agencies that serve LEP populations.
4. The City will distribute event information to community groups and agencies that work with LEP populations.
5. The City will employ bilingual staff who can translate for LEP individuals that speak Spanish.
6. The City will ensure that non-English interpretation is available at public transit meetings or workshops.
7. The City will attend existing community meetings and activities to invite participation from LEP populations who may not attend City-hosted public meetings.

As discussed in the Language Assistance Plan, 28.6 percent of individuals five years of age or older in the City of Moorpark speak a language other than English at home. Spanish is the most common language other than English, spoken by 20.8 percent of the population, and 8.3 percent of the population speaks Spanish at home and speaks English less than "very well" (and is thereby considered to be limited English proficient).

The Safe Harbor Provision of Title VI covers languages spoken by more than five percent of the population (in Moorpark, this translates to about 1,700 people) or 1,000 individuals, whichever is less. A "safe harbor" means that if an FTA recipient provides written translations for these emerging languages, it will be considered strong evidence of compliance with the recipient's written-translation obligations. There is only one language group in Moorpark that potentially falls under the Safe Harbor Provision. Spanish, with 2,826 LEP individuals, represents both more than five percent of the population and more than 1,000 individuals.



Action Items for Use of Public Participation Plan

The City will use its public participation plan when considering fare changes, modifications to routes and schedules, and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any route on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10 percent of current total service hours;
- Recommending changes to routing on any given route that affects more than 25 percent of the riders using the affected route;
- Schedules are changed on any given route that reduce the total number of one-way bus trips by more than 25 percent of the current number of bus trips; and
- Developing the FTA Program of Projects in conjunction with VCTC for projects that benefit the Moorpark area, including City projects.

For minor schedule and service changes, the City will post service change notices 30 days in advance on the City's website, on buses, and at bus stops. When the City of Moorpark considers fare or significant service changes, it will take several actions including:

- Issuing media releases to all local media outlets in English and Spanish.
- Advertising in English and Spanish publications.
- Surveying riders in English and Spanish.
- Making staff available to community groups and schools.

Input Mechanisms

The City accepts input and comments from the public through a variety of channels:

- a. By mail to 799 Moorpark Avenue, Moorpark, CA 93021;
- b. By emailing mwoomer@moorparkca.gov; and
- c. By phone at 805.517.6240.

The public may also submit comments to individual Moorpark city council members or directly to the city council itself. In addition, comments on the City's transit services, plans, reports, and programs may be made at public input meetings. The City ensures all public input meeting locations are accessible in accordance with the Americans with Disabilities Act (ADA).

Members of the public, or a representative of a group, with expressed comments on a particular topic may make a request to the Mayor for an appointment to serve as a citizen representative on an appropriate subcommittee, if one is activated. Interested members of the public are able to offer input to the committees during a public forum element of each agenda.



The City does consider and respond to all public input received during planning and program development processes. If significant written or oral comments are received on transit services, FTA civil rights programs, or plans, a summary, analysis, and report on the disposition of the comments is made a part of the conclusion of the public participation process.

Evaluation

The City will review this Public Participation Plan periodically in order to monitor the effectiveness of the procedures outlined in this document. Following evaluation of the outputs and outcomes of the Public Participation Plan, the City may revise these methods to incorporate new and innovative ways to involve the public in the transportation decision-making process.



Section 6 | Summary of Outreach Efforts

A summary of outreach activities taking place during FY 2022 – FY 2024 is provided in Exhibit 6.1. It should be noted that this time period was in the wake of the COVID-19 pandemic, which impacted many in-person outreach activities.

Exhibit 6.1 Outreach Activities, FY 2022 – FY 2024

Event Name	Information
3 rd of July Fireworks Extravaganza	Community event held on July 3 rd
Moorpark Country Days	Community event held in October



Section 7 | Language Assistance Plan and Four-Factor Analysis

Purpose of the Language Assistance Plan

This Language Assistance Plan has been prepared to address the City's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1A dated May 13, 2007, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

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

The City's Language Assistance Plan was adapted from the Plan created by the Ventura County Transportation Commission (VCTC) in support of its Title VI Program. In prior years, as a subrecipient to VCTC, the City of Moorpark incorporated VCTC's Language Assistance Plan as part of its own Title VI Program. In 2024, the City developed its own Language Assistance Plan to better reflect the needs of the City of Moorpark. This Plan includes a four-factor analysis and language assistance measures specific to the City of Moorpark.

Service Overview

The City administers Moorpark City Transit services under a contract with the City of Thousand Oaks for fixed-route and demand-response services. The City of Thousand Oaks then contracts operation of the service to MV Transportation. The City administers MCT On Demand under contract with First Transit for its on-demand micro-transit program.

Moorpark City Transit services consist of two fixed routes, senior dial-a-ride, paratransit, and the MCT On Demand service. Moorpark City Transit operates generally Monday through Friday from 6:00 a.m. to 7:00 p.m..

The City has developed this Language Assistance Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Moorpark City Transit. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

Language Assistance Plan Goals

One of the overarching goals of the City of Moorpark's 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.



This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available. The first step toward this is the development of a Four-Factor Analysis as outlined by the U.S. Department of Transportation (USDOT). The Four-Factor Analysis includes:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Moorpark City Transit activities or services.
2. The frequency with which LEP persons come in contact with Moorpark City Transit activities or services.
3. The nature and importance of programs, activities, or services provided by the Moorpark City Transit to the LEP population.
4. The resources available to Moorpark City Transit customers and overall cost to provide LEP assistance.

Following the Four-Factor Analysis, the Language Assistance Plan (LAP) includes methodologies for identifying LEP individuals, providing services, establishing policies, and monitoring the LAP, as well as an implementation plan.

Four-Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Estimating the number or proportion of LEP individuals that may be encountered by Moorpark City Transit 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 a response from customers,
- Materials 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 Moorpark City Transit'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

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 located within the City of Moorpark's geographic boundaries.



An analysis of the racial composition of Moorpark reveals more than half of residents self-identify as White (65.8 percent), while 33.2 percent identify as Hispanic or Latino. Persons identifying as two or more races comprise 16.6 percent of residents, while 6.9 percent identify as Asian. This is a slightly higher White population than Ventura County and the state as a whole. The percentage of Hispanic/Latino residents of Moorpark is lower than that of Ventura County and that of California.

Exhibit 7.1 Racial Breakdown of Total Population of Service Area

Race	Moorpark City		Ventura County		California	
	Estimate	Percent of Total	Estimate	Percent of Total	Estimate	Percent of Total
Total	36,073	100.0%	842,009	100.0%	39,356,104	100.0%
White alone	23,733	65.8%	544,398	64.7%	18,943,660	48.1%
Black or African American alone	942	2.6%	15,042	1.8%	2,202,587	5.6%
American Indian or Alaska Native alone	291	0.8%	10,595	1.3%	394,188	1.0%
Asian alone	2,505	6.9%	60,951	7.2%	5,949,136	15.1%
Native Hawaiian or Pacific Islander alone	14	0.0%	1,760	0.2%	150,531	0.4%
Some other race alone	2,583	7.2%	70,380	8.4%	6,388,999	16.2%
Two or more races	6,005	16.6%	138,883	16.5%	5,327,003	13.5%
Ethnicity						
Hispanic or Latino (of any race)	11,989	33.2%	370,200	44.0%	15,617,930	39.7%

Source: American Community Survey 2022 5-Year Estimates.

The American Community Survey (ACS) data details the language spoken at home for persons five years of age and older. ACS 2022 five-year estimates (the most recent data available at this level of detail) revealed 71.4 percent of Moorpark residents spoke only English at home, while 20.8 percent spoke Spanish, making it the most commonly spoken language other than English found within the service area. The next most cited language spoken at home was “Other Indo-European languages”¹ with 2.2 percent, followed by Tagalog with 1.4 percent.

While nearly one-third of Moorpark residents speak another language at home, many of them speak English “very well.” In fact, 63.8 percent of those who speak a language other than English at home speak English “very well.” This segment of the population comprises 18.2 percent of the total population of Moorpark age five and older.

Given the large population of Spanish speakers, it is not surprising to find Spanish speakers who speak English less than “very well” comprise 8.3 percent of the total population age five and older. By contrast, “Other Indo-European language” speakers who speak English less than “very well” comprise just 0.4 percent of the total, while LEP Tagalog speakers comprise 0.2 percent.

Based on data provided for English Learners in Moorpark (discussed below), the most likely “Other Indo-European languages” spoken in Moorpark include Gujarati, Armenian, Urdu, and Portuguese.

¹ Per the U.S. Census Bureau, the “Other Indo-European languages” category in the American Community Survey includes languages such as Italian, Portuguese, Greek, Serbo-Croatian, Armenian, Persian (including Farsi, Dari), Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, Konkani, other Indic languages, Albanian, Lithuanian, Pashto, Romanian, Swedish, Telugu, Tamil, Malayalam, Kannada, and other Dravidian languages. The distribution of individual languages within the language group is not provided.



When compared to both Ventura County and the state of California, Moorpark features a larger percentage of residents who speak only English and a lower incidence of LEP individuals (10.3 percent of Moorpark residents compared to 14.5 percent of Ventura County and 17.1 percent of California residents). The population of LEP Spanish-speakers in Moorpark (8.3 percent) is significantly lower than that of Ventura County (11.8 percent) and California (10.8 percent).

Exhibit 7.2 Languages Spoken at Home By Community

	Moorpark City		Ventura County		California	
	Estimate	Percent of Total	Estimate	Percent of Total	Estimate	Percent of Total
Total Population (age 5 and up)	33,985	100.0%	796,345	100.0%	37,097,796	100.0%
Total Speak only English	24,275	71.4%	493,871	62.0%	20,809,671	56.1%
Total Speak language other than English	9,710	28.6%	302,474	38.0%	16,288,125	43.9%
Total Speak English "very well"	6,196	18.2%	186,719	23.4%	9,929,983	26.8%
Total Speak English less than "very well"	3,514	10.3%	115,755	14.5%	6,358,142	17.1%
Speak English less than "very well" - breakdown						
Spanish	2,826	8.3%	94,090	11.8%	4,017,360	10.8%
French, Haitian, or Cajun	15	0.0%	244	0.0%	17,303	0.0%
German or other West Germanic languages	27	0.1%	448	0.1%	12,528	0.0%
Russian, Polish, or other Slavic languages	79	0.2%	756	0.1%	99,385	0.3%
Other Indo-European languages	153	0.5%	3,405	0.4%	377,204	1.0%
Korean	40	0.1%	1,434	0.2%	195,175	0.5%
Chinese (incl. Mandarin, Cantonese)	57	0.2%	3,708	0.5%	669,536	1.8%
Vietnamese	78	0.2%	1,940	0.2%	330,882	0.9%
Tagalog (incl. Filipino)	69	0.2%	3,476	0.4%	248,922	0.7%
Other Asian and Pacific Island languages	5	0.0%	2,527	0.3%	257,526	0.7%
Arabic	0	0.0%	721	0.1%	71,666	0.2%
Other and unspecified languages	165	0.5%	3,006	0.4%	60,655	0.2%

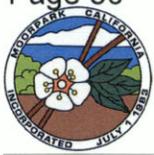
Source: American Community Survey 2022 5-Year Estimates.

Based on the Safe Harbor provision cited above, only Spanish falls into the category of “1,000 individuals or five percent of the population, whichever is less.” While the City is not required to provide materials in other languages based on the Safe Harbor provision, it may elect to do so depending on how frequently LEP speakers of other languages come into contact with the transit program. This is assessed under Factor 2.

City of Moorpark English Learner Data

In addition to census data collected via the American Community Survey (ACS), the City also reviewed English Learner (EL) statistics for students within the Moorpark Unified School District. 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 each year, which provides more current data than the ACS. This data is available online via CDE’s DataQuest website, dq.cde.ca.gov/dataquest/.

The City accessed the available EL data for the 2023/24 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.



The highest concentration of EL students within Moorpark speak Spanish, followed distantly by Mandarin. Detailed counts and relative percentages are presented in Exhibit 7.3.

Exhibit 7.3 School English Learner (EL) Population

Language Name	TK	K	1	2	3	4	5	6	7	8	9	10	11	12	Total	Percent of Total
Spanish; Castilian	22	54	62	65	49	62	66	36	36	33	25	18	19	16	563	91.8%
Mandarin (Putonghua, Guoyu)	2	3	1	1	0	0	1	0	0	1	0	0	0	0	9	1.5%
Arabic	0	0	2	0	1	1	2	0	0	0	0	0	0	0	6	1.0%
Uncoded languages (Other non-English languages)	1	1	2	1	0	0	0	0	0	1	0	0	0	0	6	1.0%
Vietnamese	0	1	0	0	1	0	1	1	1	0	0	0	1	0	6	1.0%
Russian	1	0	1	0	2	1	0	0	0	0	0	0	0	0	5	0.8%
French	0	0	0	1	0	0	0	1	0	0	1	0	0	1	4	0.7%
Gujarati	1	1	0	0	0	0	0	1	0	0	0	0	0	0	3	0.5%
Armenian	0	0	0	0	0	0	1	0	0	0	1	0	0	0	2	0.3%
Korean	0	0	0	0	0	0	2	0	0	0	0	0	0	0	2	0.3%
Urdu	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0.3%
Thai	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0.2%
Ukrainian	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0.2%
Philippine languages	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0.2%
Portuguese	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0.2%
Indonesian	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0.2%
Total	29	60	68	68	53	64	73	40	37	38	27	18	21	17	613	100.0%



Factor 2: The frequency with which LEP persons come into contact with the program.

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

Staff Survey

City and contractor 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 Moorpark Transit.

Data from the 10 completed City staff/driver surveys generally corroborate the findings described in the Service Area Demographics section. Specific highlights from the driver survey are detailed below.

- Approximately 20 percent of the surveyed transit staff speak Spanish. Of the 10 individuals surveyed, two cited speaking Spanish.
- All 10 respondents reported encountering Spanish-speaking customers. Encounters with Chinese-speaking customers was cited once.
- Nearly 67 percent of drivers (four responses) said they encounter five to ten unique individuals each week who do not speak English or who do not speak English very well. Another 33.3 percent said they encounter fewer than five.
- Half of customer service representatives/dispatchers said they encounter fewer than five unique individuals each week who do not speak English or who do not speak English very well. One cited encountering between five and ten such customers each week.
- Due to regular frequency of contact with LEP individuals, 66.7 percent of staff reported occasional issues. Two individuals cited no issues or problems. One individual did not answer the question.
- When asked what materials/services would be of most benefit to riders who do not speak English or do not speak English well, 70 percent said translated route brochures, while 30 percent cited common phrases cards (translated into various languages) and onboard notices in other languages.
- The most common topics impacted by a language barrier were basic directions/instructions (cited by 60 percent) and how to use Moorpark City Transit (cited by 40 percent).

A copy of the staff survey instrument is provided in Attachment B.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Transit services operated by the City of Moorpark play a vital role in the lives of many residents of the service area. To better understand Moorpark City Transit's role among LEP populations, 22 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 Moorpark. Of the stakeholders contacted, four individuals representing four organizations completed a 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 Moorpark City Transit.

Four stakeholder surveys were received: Moorpark Unified School District, Moorpark City Library, Moorpark Active Adult Center, and Holy Cross Church.

- All four stakeholders indicated Spanish as one of the languages they encounter. Other languages cited were Vietnamese (3); Chinese (2); and Farsi, Hindi, Japanese, Korean, Russian, and Tagalog (one each).
- Most of the non-native English speakers all of the stakeholders encounter speak English somewhat well, though only two indicated they read English somewhat well. Two stakeholders indicated they did not read English well.
- Three of the stakeholders indicated the populations they served use Moorpark City Transit, though only one indicated language as a barrier to using transit. The languages for which there was a perceived barrier were Spanish, Hindi, and Chinese.
- Only one stakeholder identified additional challenges for those for whom language is a barrier for using transit. They included:
 - Limited access to information: lack of multilingual resources online or printed; transit schedules, routes, and service updates are often only available in English.
 - Communication barrier: difficulty communicating with transit staff who may not speak the passenger's native language; inability to understand important signs or announcements provided only in English.
 - Safety concerns: challenges in understanding safety instructions; difficulty navigating the transit system or finding the correct stops.
 - Even if information is available in another language online, the website's primary language being English can make it difficult for non-English speakers to navigate to the multilingual resources.

A copy of the stakeholder survey instrument is provided in Attachment B.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The City of Moorpark currently provides resources to each LEP group while maintaining cost efficiency for taxpayers. Resources may include, but are not limited to:

1. Bilingual staff (both the City and the operations contractor have employees who are fluent in Spanish).
2. On-call translation services (the operations contractor can provide telephone interpretation through its Language Line account).
3. Spanish-language service information and notices.



Conclusions

The Four-Factor Analysis showed a significant portion of the population within the Moorpark City Transit service area (10.3 percent) speaks English less than very well. Spanish is the most commonly spoken language other than English, reflecting 20.8 percent of the population age five and older. Spanish was determined to be the only language that fell within the Safe Harbor guidance based on demographic analysis, with 8.3 percent of the population, or 2,826 individuals, speaking English less than “very well.”

The employee survey found Spanish to be the most frequently encountered language by the transit program and several employees said they encountered five or more unique LEP individuals each week. Employees indicated occasional issues with communication.

The stakeholder surveys also reinforced Spanish as the most frequently encountered language. While there are numerous other languages present in the service area, they are encountered infrequently and populations are relatively small.

While the City is not required under Title VI to provide documents and information in any language other than Spanish, there may still be some residents who do not use Moorpark City Transit’s services due to a language barrier. Strategies to address this, as well as other recommendations, are identified within the Language Assistance Implementation Plan.

Language Assistance Implementation Plan

Language measures currently used or planned to be used by the City of Moorpark to address the needs of LEP persons include the following:

- Translating vital documents including the Civil Rights Public Information Form, Title VI Civil Rights Complaint Form, and Senior Dial-A-Ride Application into Spanish;
- Ensuring the Title VI Notice to the Public is posted in Spanish;
- Ensuring service information (such as the Bus Ride Guide) includes Spanish-language information;
- Incorporating the Title VI Notice to the Public in English and Spanish in future versions of the Bus Ride Guide;
- Translating marketing materials into Spanish;
- Promoting awareness of the transit contractor’s Language Line in target languages (Spanish as well as other languages such as Chinese and Hindi);
- Incorporating an effective translation tool into the City’s website, which can provide translation into, at a minimum, Spanish.
- If needed, arranging for availability of oral translators depending on availability;
- Providing interactive meeting materials to engage LEP individuals in the planning process; and
- Posting notices in appropriate languages informing LEP persons of available transit services, routes, and amenities; as well as opportunities for LEP persons to provide input on transit-related projects.



The City will continue to seek ways to add notices to the City website to inform LEP populations of opportunities for input.

Online Resources

While the Title VI Notice to the Public, Public Information Form, and Complaint Form are posted on the City's website, the transit website is not translated in Spanish. There is a Google Translate tool at the bottom of the site which can provide translation into many different languages. However, the list of languages is extensive and there is no scrollbar, so it is impossible to select Spanish even using a large computer monitor. The main Transportation page does include a .pdf of the Rider's Guide which includes service information in Spanish, though there is no indication from that page that the document includes Spanish content.

The City's separate webpage for the MCT On Demand (<https://www.mctondemand.com/>) has a Google Translate tool that effectively provides Spanish translation for the entire page.

Bilingual Staff

Some transit customers have limited English literacy skills and are unable to read or write in English. The City, through its transit operations contractor, has bilingual customer service representatives, dispatchers, and drivers that can assist its native Spanish-speaking population with minor translation services.

Staff Training

MV Transportation includes Title VI as a component of its staff training. To ensure effective implementation of this plan, all City transit services will schedule training at orientations for new staff and relevant employees on an annual basis to review:

- City of Moorpark's Language Assistance Plan,
- Demographic data about the local LEP populations,
- Printed materials available to LEP individuals,
- Other resources available to assist LEP individuals,
- How to provide assistance to customers with Limited English Proficiency,
- Which staff members are key resources for various languages,
- How to use Language Line on-demand telephone interpretation,
- How and when to document interactions with LEP customers, and
- How to identify and respond to civil rights complaints.

Notice to LEP Persons about Available Language Assistance

The City is working toward being able to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- Notices on the City's Transportation webpage,
- Providing information at local events, and
- Including this information on service collateral (e.g., brochures).



The Title VI Notice to the Public is provided in Spanish onboard transit vehicles and at the City of Moorpark City Hall front desk, as well as on the City's Title VI webpage. The Title VI Notice to the Public includes statements in English and Spanish regarding how to obtain information in another language.

Monitoring, Evaluating, and Updating Plan

The Language Assistance Plan has been updated as part of this Title VI Program Update. On an ongoing basis, monitoring activities may identify changes that should be made to the Language Assistance Plan. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan.

The City of Moorpark will regularly assess the effectiveness of how it communicates with LEP individuals through:

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

The City will monitor its language assistance efforts, including:

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



Implementation Plan

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

Exhibit 7.4 LAP Implementation Plan

Goal	Task	Anticipated Completion
Assess LEP population in the Moorpark City Transit service area	Four Factor Analysis	August 2024
	Stakeholder Survey	August 2024
	Driver/Staff Survey	August 2024
	Customer Survey (through VCTC)	Summer 2024
	Demographics Analysis	August 2024
Develop Language Assistance Procedures	Update City website to include effective translation tool	FY 2025
Staff Training	Train transit staff regarding language resources and materials available to LEP individuals	FY 2025
	Train contractor staff regarding use of Language Line telephone interpretation service	FY 2025
	Train staff regarding how and when to document interactions with LEP customers	FY 2025
	Train City Staff how to respond to civil rights complaints	FY 2025
Notification of Title VI Rights and Materials	Ensure notices continue to be posted in English and Spanish as cited herein	Ongoing
	Include Title VI Notice to the Public in future versions of the Bus Ride Guide	When updated
Monitor and Update Language Assistance Plan	Regularly review ACS and census demographic data	FY 2027
	Incorporate discussion of Title VI into regular staff meetings and trainings	Ongoing



Section 8 | Minority Representation on Planning and Advisory Bodies

The FTA requires the City to document efforts to encourage participation of minorities on non-elected committees, board, councils, or other bodies. The City must provide in its Title VI Program a table of transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the City of Moorpark city council, and must indicate the racial breakdown of the membership of such committees or councils.

The City of Moorpark has not established any non-elected transit-related committees or councils.

Should a non-elected committee or council specific to transit be established in the future, a summary of the committee members identified by race and a description of efforts made to encourage the participation of minorities on said committee will be provided in this section utilizing the table below.

Exhibit 8.1 Non-Elected Committee Membership Table

Race/Ethnicity	Service Area Population (Percentage)	Commission (Percentage)
Caucasian	65.8%	XXX%
Hispanic/Latino	33.2%	XXX%
Black/African American	2.6%	XXX%
Asian	6.9%	XXX%
American Indian/Alaska Native	0.8%	XXX%
Native Hawaiian/Pacific Islander	0.0%	XXX%

Member participation and selection will be monitored by the City Clerk.

The City does conduct outreach when there is a need to fill vacancies on the VCTC's Citizens Transportation Advisory Committee/Social Services Transportation Advisory Committee (CTAC/SSTAC). Those who apply to for a seat on the committee contact the City Clerk's office. The City Clerk then writes a staff report for City council approval on the nominees. The City will ensure that postings about vacancies on these committees are provided in Spanish as well as English. The minority representation of this committee is reported by VCTC within its Title VI Program.



Section 9 | Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions

The City currently contracts its federally funded transit operations to the City of Thousand Oaks, which in turn contracts with MV Transportation. While third-party contractors are not required to develop their own Title VI Programs, the City of Thousand Oaks, as a transit operator, is required to maintain its own Title VI Program. Therefore, the City of Moorpark should confirm that the City of Thousand Oaks prepares, updates, and enforces its Title VI Program to ensure it remains in compliance. The City of Moorpark should also ensure that First Transit, which operates the MCT On-Demand service, remains in compliance with the City's Title VI Program.



Section 10 | Title VI Equity Analysis

Title VI regulations require the completion of an Equity Analysis whenever a recipient or subrecipient begins planning the location 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 Moorpark has not undertaken any construction projects for facilities at a new location within the past several years. Therefore, no Equity Analysis is required at this time.

If in the future the City of Moorpark 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 Moorpark 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 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 where 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 must 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 shall be completed and submitted as part of the City of Moorpark's next Title VI Program update.



Section 11 | System-wide Standards and Policies

The FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment. Since the City operates fixed-route bus service, system-wide standards and policies are discussed below.

Vehicle Load

Vehicle Load or load factor is a ratio of the number of seats on a vehicle to the number of passengers. Load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles. It is also a means to determine whether the level of service on a particular route at a particular time is adequate to assure a level of service deemed appropriate for the transit system. As a service standard, load factor is typically expressed as a ratio (E.g. 1:1.25 or one seat for every 1.25 passengers). The load factor is determined by taking the number of seats on a specific route which pass the peak point during the peak hour and dividing that into the number of passengers that are actually carried past that point during that hour. Vehicle loads are monitored for all routes to determine if additional vehicles are needed to avoid overcrowding.

Moorpark City Transit fixed-route vehicle load shall not exceed 1:1.4, or one seat for every 1.4 passengers, to account for the ability of passengers to stand while in a City fixed-route vehicle.

Moorpark City Transit dial-a-ride and on-demand vehicle load shall not exceed 1:1, or one seat for every one passenger.

Vehicle Headway

Vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction on the same route. The frequency of service is a general indication of the level of service provided along a route and a factor in the calculation of the amount of travel time expended by a passenger to reach his/her destination. It is generally expressed for peak and off-peak service as an increment of time (e.g. peak: every 15 minutes; and off-peak: every 30 minutes).

Local bus service is usually more frequent than intercity bus service because the travel distance is generally longer on intercity buses. The City does not currently operate any intercity bus routes, with service limited to travel within the City.

While the goal of Moorpark City Transit's fixed-route vehicle headways is to be 60 minutes or less, Monday through Friday, many trips require 65 minutes to 75 minutes due to the necessity of driver breaks, peak traffic in certain areas of the City, and the necessity of delaying bus departures to ensure proper connections to locations of peak passenger sources.



On-time Performance

Moorpark City Transit strives to ensure a minimum of 95 percent of all fixed-route runs operate on time. "On time" is defined as departing no more than five (5) minutes late and not ahead of schedule.

Service Availability

Moorpark City Transit operates a fixed-route service that travels throughout much of the City. Routes 1 and 2 provide service to a majority of the same areas in a clock-wise and counter-clockwise fashion in order to generally provide equal travel times for passengers traveling to and from the same location. Some differences do occur, such as Route 2 solely providing service to Villa Del Arroyo Mobile Home Park. In addition, the City provides complementary ADA paratransit service within the City as well as a senior dial-a-ride service. The City participates in the East County Transit Alliance InterCity ADA and senior dial-a-ride service. The City also operates a general public on-demand micro-transit program.

Service Policies

Distribution of Transit Amenities

The City provides various amenities at its bus stops. Nearly all bus stops have bus stop signs with route maps and schedules posted. Some bus stops have benches and shelters that are provided as conditions of approval for development. Other bus stops include shelters, benches and trash receptacles. The determination of where shelters should be located is determined by general bus stop use as well as overall accessibility, such as sufficient right-of-way and ADA clearance.

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the transit provider's system. At present the City owns five 32-foot compressed natural gas (CNG) El Dorado National EZ Rider II buses. Three buses are 2010 model years and two buses are 2015 model years. At present two buses are used on a daily basis for Route 1 and Route 2. All buses are interchangeable; vehicle assignments are done in a manner that ensures rotation of fleet vehicles throughout all the routes in the City system.

The City has added two Braun minivans and one Ford Starcraft cutaway for use in its on-demand micro-transit service. All vehicles are wheelchair accessible. The vans fit up to four passengers and one wheelchair, while the cutaway fits seven passengers and two wheelchairs.



Section 12 | City Council Approval of Title VI Program Update

[Pending]



Attachment A | Draft Title VI Letters

Exhibit A.1 Sample letter acknowledging receipt of complaint

[Date]

Jo Doe
1234 Main Street
Moorpark, CA 93021

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the City of Moorpark alleging _____

An investigation will begin shortly. If you have any additional information you wish to convey or questions concerning this matter, please feel free to contact this office using the information below.

Sincerely,

Michelle Woomer
Senior Management Analyst
City of Moorpark
799 Moorpark Ave.
Moorpark, CA 93021
(805) 517-6233
mwoomer@moorparkca.gov



Exhibit A.2 Sample letter notifying complainant that the complaint is substantiated

[Date]

Jo Doe
1234 Main Street
Moorpark, CA 93021

Dear Ms. Doe:

The matter referenced in your letter of _____ [date] _____ against the City of Moorpark alleging a Title VI violation has been investigated.

(An/Several) apparent violations of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter, (was/were) identified. Efforts are underway to correct those deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. [If a hearing is required, the following sentence may be appropriate.] You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Michelle Woomer
Senior Management Analyst
City of Moorpark
799 Moorpark Ave.
Moorpark, CA 93021
(805) 517-6233
mwoomer@moorparkca.gov



Exhibit A.3 Sample letter notifying complainant that the complaint is not substantiated

[Date]

Jo Doe
1234 Main Street
Moorpark, CA 93021

Dear Ms. Doe:

The matter referenced in your letter of _____ [date] _____ against the City of Moorpark alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The City of Moorpark has analyzed the materials and facts pertaining to your case for evidence of its failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven (7) calendar days of receipt of this final written decision from the City of Moorpark, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR 1200
New Jersey Ave., SE
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Michelle Woomer
Senior Management Analyst
City of Moorpark
799 Moorpark Ave.
Moorpark, CA 93021
(805) 517-6233
mwoomer@moorparkca.gov



Attachment B | Survey Instruments



Exhibit B.1 Employee Survey Instrument



**City of Moorpark / Moorpark City Transit
FTA Title VI Compliance – City Staff Survey**

1. **All staff:** Please list the languages **other than English** that you speak. Indicate whether you are fluent in the language(s).

2. **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 course of a typical week, only count them once.* None Less than 5 5 to 10 More than 10

3. **Dispatchers/Customer Service Representatives/other staff:** In a typical week, how many encounters do you have with individuals that either do not speak English or do not speak English very well? *Please count unique individuals only. If you encounter the same individual multiple times during the course of a typical week, only count them once.* None Less than 5 5 to 10 More than 10

4. **Drivers:** Are the riders observed in Question 2 typically boarding and/or getting off at certain locations or in specific parts of the service area? If so, please identify these locations.
 Trip origin locations/areas: _____
 Trip destination locations/areas: _____

5. **All staff:** With respect to transit customers, please indicate the most common languages you encounter **other than English**. (check all that apply)
 Spanish Vietnamese
 Tagalog Other language(s): _____
 Chinese No languages other than English

6. **All staff:** How would you rate your ability to communicate with persons who do not speak English or do not speak English very well? No issues or problems Occasional problems Frequent problems

7. **All staff:** How do your personal language capabilities impact your ability to interact with Moorpark City Transit riders?
 They **improve** my ability to communicate. They **hinder** my ability to communicate.
 Not applicable/no impact.

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

9. **All staff:** In terms of language/communication barriers, please identify the most common areas or topics (specific to Moorpark City Transit riders). Is it...?
 How to use Moorpark City Transit How to pay for a ride on Moorpark City Transit
 Basic directions/instructions Other: _____

10. **All staff:** For data collection purposes only, please include your name and position below.
 Name (optional): _____
 Position: _____

Please return completed surveys to _____ by July 22, 2024. Thank you for your support of this project.



Exhibit B.2 Stakeholder Survey Instrument



**City of Moorpark / Moorpark City Transit
FTA Title VI Compliance Stakeholder Survey**

This survey may also be completed online at <https://www.surveymonkey.com/r/MoorparkStakeholderSurvey>.

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? (check all that apply) <input type="checkbox"/> English <input type="checkbox"/> Spanish <input type="checkbox"/> Tagalog <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <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... <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 the City of Moorpark's public transit services (Moorpark City Transit fixed route, MCT On Demand, or Dial-A-Ride)? <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"/> 51 to 75 percent <input type="checkbox"/> 25 to 50 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 Moorpark's transit services? <input type="checkbox"/> Yes (<i>please answer Questions 11 and 12</i>) <input type="checkbox"/> No (<i>skip to Question 13</i>) <input type="checkbox"/> I don't know (<i>skip to Question 13</i>)
11	Which language(s) other than English do these members/clients speak?
12	What kind of barriers are faced by those for whom language is a barrier to using the City of Moorpark's transit services?
13	Is there anything else you would like us to know regarding individuals represented by your organization who speak English less than "very well" and are considered to be limited English-proficient?

Thank you for your participation. Please return your completed survey via email to jill@moore-associates.net no later than July 31, 2024. You may also complete the survey online at <https://www.surveymonkey.com/r/MoorparkStakeholderSurvey>.

STATE OF CALIFORNIA)
COUNTY OF VENTURA) ss.
CITY OF MOORPARK)

CERTIFICATION

I, Ky Spangler, City Clerk of the City of Moorpark, California, do hereby certify under penalty of perjury that the foregoing Resolution No. 2024-4273 was adopted by the City Council of the City of Moorpark at a regular meeting held on the 18th day of September, 2024, and that the same was adopted by the following vote:

AYES: Councilmembers Castro, Delgado, Means and Mayor Enegren
NOES: None
ABSENT: Councilmember Groff
ABSTAIN: None

WITNESS my hand and the official seal of said City this 20th day of September, 2024.



Ky Spangler, City Clerk
(seal)

