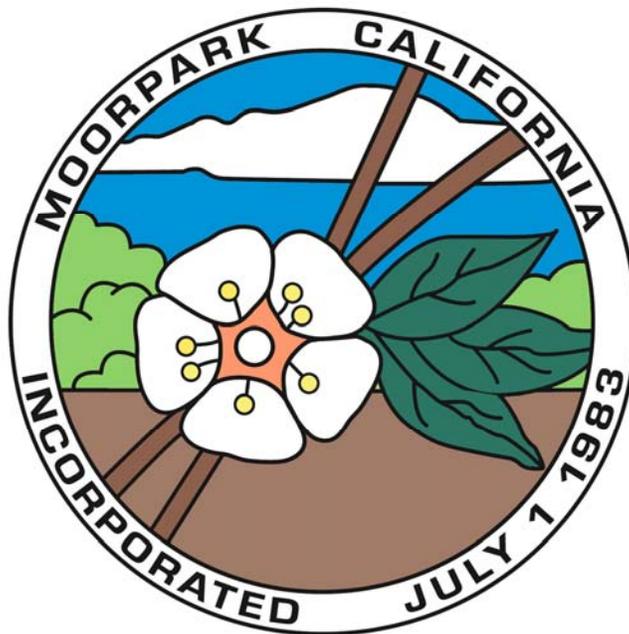


CITY OF MOORPARK/MOORPARK CITY TRANSIT



TITLE VI PROGRAM
Title VI of the Civil Rights Act of 1964
Adopted September 4, 2019
Effective thru May 31, 2021¹

Contact Information:
Shaun Kroes, Program Manager
City of Moorpark
799 Moorpark Avenue
Moorpark, CA 93021
805-517-6257
skroes@moorparkca.gov

¹ Expiration date matches VCTC's date. Sections of VCTC's Title VI Program are incorporated into the City's Title VI Program.

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Introduction

The United States Department of Transportation (US DOT) and the Federal Transit Administration (FTA) require agencies that operate transit service to comply with the general requirements of the Title VI regulations. The purpose of the Title VI Program is to ensure that the level and quality of City of Moorpark/Moorpark City Transit (City) service is provided without regard to race, color, national origin or income status.

As sub-recipient to the regional grantee, Ventura County Transportation Commission (VCTC), the City is eligible to adopt certain elements of the VCTC Title VI Program per FTA Circular 4702.1B, dated October 1, 2012. Appropriate, adoptable elements include the following:

- Notice to Beneficiaries
- Title VI Complaint Procedures
- Language Assistance Plan (LEP Plan)
- Public Participation Plan

The City has elected to adopt eligible elements of the VCTC Title VI Program, in order to satisfy federally-mandated Title VI requirements; adopted elements are noted accordingly. The following sections describe the City's Title VI Program in detail.

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 VCTC's civil rights program and procedures to file a complaint, call 805-517-6257, visit www.moorparkca.gov/transit, or write to City of Moorpark, Public Works Program Manager, 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. 20590.

La Ciudad de Moorpark Aviso al Publico de Derechos Civiles

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

Para obtener informacion adicional sobre el programa de derechos civiles de VCTC y los procedimientos para presentar una queja, llame al 805-517-6257, visite www.moorparkca.gov/transit o escribe al Ciudad, Public Works Program Manager, 799 Moorpark Avenue, Moorpark, CA 93021.

Ademas del Titulo VI proceso de Ciudad, un reclamante puede presentar una queja del Titulo VI con la administracion federal de transito, Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

List of Locations Where Title VI is Posted

City Title VI notice to the public is currently posted at the following locations:

City of Moorpark Front Counter
799 Moorpark Avenue, Moorpark, CA 93021

Moorpark City Transit Buses

Website: www.moorparkca.gov/transit

Title VI Complaint Procedures

To ensure compliance with Title 49 of the Code of Federal Regulations (CFR) Section 21.9(b), VCTC and sub-recipients (such as City of Moorpark) are required to develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. In order to reduce the administrative burden associated with this requirement, VCTC sub-recipients may adopt the Title VI complaint investigations and tracking procedures developed by VCTC. As such, the City has adopted VCTC Title VI Complaint Procedures as part of its Title VI program.

TITLE VI POLICY

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 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 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 City's stations serving the City, and location of routes will not be determined on the basis of race, color or national origin.

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

City of Moorpark
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 the City. The complaint must be filed within one hundred and eighty (180) days of the date of the alleged discrimination. Written complaints may be sent to:

City of Moorpark
Attn: City Engineer/Public Works Director
799 Moorpark Avenue
Moorpark, CA 93021

The "Title VI Complaint Form" is available online at www.moorparkca.gov/transit and should be used to detail the complaint, but is not mandatory. Complaint forms may also be obtained by calling 805-517-6257. In addition to the Title VI complaint process at the City, a complainant may file a Title VI complaint with the FTA, Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

If a complaint is made in a language other than English, the City will translate the complaint 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.

HOW COMPLAINTS ARE PROCESSED BY THE CITY

All complaints alleging discrimination based on race, color or national origin in a transit service or benefit provided by the City will be recorded by the City's Public Works Program Manager by updating the "List of Active Investigations, Lawsuits or Complaints." This list shall include the date that 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 sub-recipient in response to the investigation, lawsuit, or complaint. The list shall be made available to FTA upon request and with every City 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 the complaint and prepare a draft written response. If appropriate, City staff may administratively close the complaint.

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

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 or her right to file a complaint externally. The complainant also will be advised of his or her right

to appeal the response to federal and state authorities as appropriate.

The City will use its best efforts to respond to a Title VI complaint within sixty (60) working days of its receipt of such a complaint. Attachment 1 includes a sample letter acknowledging receipt of the complaint, substantiating the complaint, and not substantiating the complaint; all modeled from VCTC sample letters. Attachment 2 provides the City's Title VI Complaint Form; also modeled from VCTC sample forms.

Transit-Related Title VI Investigations, Complaints, and Lawsuits

To ensure compliance with 49 CFR Section 21.9(b), the City is required to prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the City that allege discrimination on the basis of race, color, or national origin. This list shall include the date that 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 sub-recipient in response to the investigation, lawsuit, or complaint.

There have been no complaints naming the City alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

Public Participation Plan, Public Participation Process, Minimum Outreach Requirements, Outreach Methods to Engage Minority and Limited English Proficient Populations

The VCTC Title VI Program for Public Participation Plan, Public Participation Process, Minimum Outreach Requirements, Outreach Methods to Engage Minority and Limited English Proficient Populations (pages 8-10), adopted April 6, 2018, and any future amendments are incorporated into the City's Title VI Program and included as Attachment 3.

The following exceptions apply:

- References to VCTC's website and phone number for the purpose of public information dissemination shall be replaced with the City's website (www.moorparkca.gov/transit) and phone number (805-517-6257).
- The first page of VCTC's page 8, "Transit-Related Title VI Investigations, Complaints, and Lawsuits" is replaced with the following sentence: "The City of Moorpark/Moorpark City Transit has had no Title VI discrimination complaints filed in the past six years."

Language Assistance Plan, Overview of VCTC, Language Assistance Goals, Results of the Four Factor Analysis, Implementation Plan, General Measures or Practices,

Monitoring and Updating of the LAP Plan and Staff Training

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

In developing a language implementation plan VCTC and sub-recipients can ensure that LEP persons have meaningful access to their programs and activities by developing and carrying out a language implementation plan pursuant to the recommendations in Section VII of the US DOT LEP Guidance.

The VCTC Title VI Program for Language Assistance Plan, Overview of VCTC, Language Assistance Goals, Results of the Four Factor Analysis, Implementation Plan, General Measures or Practices, Monitoring and Updating of the LAP Plan and Staff Training, pages 12-21, adopted April 6, 2018 and any future amendments are incorporated into the City's Title VI Program and included as Attachment 4. The VCTC Title VI Program Attachments B and C are also incorporated by reference to this document.

As an addendum to VCTC's LEP Plan, the City has staff members who can provide assistance for the Spanish speakers in the community. The City's contracted service provider (MV Transportation) also has operators who speak Spanish when residents call for dial-a-ride or bus service information.

Table Depicting the Membership of Non-Elected Committees and Councils

The City, at this time, does not have a transit-related, non-elected advisory committee. The City does have a Transportation and Public Works Committee that consists of two City Councilmembers. The City also has the ability to appoint two residents to the VCTC Citizens Transportation Advisory Committee/Social Services Transportation Advisory Committee (a VCTC state requirement).

Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions

The City is considered a subrecipient to VCTC (primary recipient). In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with the Title VI requirements, the primary recipient is not in compliance.

The VCTC Director of Programming is responsible for all subrecipient monitoring. VCTC monitors its subrecipients by ensuring that each entity meets the criteria outlined in Chapter III of Title VI Circular 4702.1B. VCTC has collected and reviewed the subrecipients' Title VI Programs which were approved by the subrecipients' governing board. VCTC also reviewed the subrecipients' website and confirmed that their Title VI Notice complaint

process and Title VI complaint form were available to the public.

VCTC's subrecipients must submit a copy of their Title VI Program triennially prior to the due date of VCTC's Title VI Program submission to the FTA. VCTC staff monitors the submissions.

Each VCTC subrecipient Title VI Program includes the following:

1. A copy of the Title VI notice to the public that indicates the subrecipients' compliance with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI.
2. A copy of the subrecipients' instructions to the public explaining how to file Title VI discrimination complaints, including a copy of the complaint form.
3. A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the subrecipient. The list only contains investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, or national origin.

Title VI Equity Analysis – Facility

An equity analysis was not required when the City incorporated in 1983 and since then no operational or maintenance facilities have been constructed for the City's transit-related services.

Additional Information for Fixed Route Providers

The City's fixed-route bus service operates fewer than 50 fixed route vehicles in peak service.

System-Wide Service Standards

In order to comply with 49 CFR Section 21.5(b)(2) and 49 CFR Section 21.5(b)(7), Appendix C to 49 CFR part 21, the City is required to adopt system-wide service policies necessary to guard against service design and operational policies that have disparate impacts. System-wide policies differ from service standards in that they are not necessary based on a quantitative threshold.

Below are the current standards and policies:

Vehicle load for each mode

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 or 1.25 or 1 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 1 seat for every 1.4 passengers, to account for the ability of passengers to stand while in a City fixed-route vehicle.

Vehicle headway for each mode

Vehicle headway is 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 end 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 for each mode

Moorpark City Transit's fixed-route on-time performance goal is 95% of all runs are on time (defined as no more than 5 minutes late). No buses shall arrive ahead of schedule.

Service availability for each mode

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 also participates in the East County Transit Alliance InterCity ADA and senior dial-a-ride service.

Service Policies – 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.

Service Policies – Vehicle Assignment

At present the City owns 5, 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 2 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.

ATTACHMENT 1

Sample Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 High St.
Moorpark, CA 93021

Dear Ms. Doe:

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

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

Sincerely,

Shaun Kroes
Public Works Program Manager
City of Moorpark
799 Moorpark Avenue
Moorpark, CA 93021
Office: 805-517-6257
Email: skroes@moorparkca.gov

Sample Letter Notifying Complainant that the Complaint is Substantiated

Today's Date

Ms. Jo Doe
1234 High St.
Moorpark, CA 93021

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against the City of Moorpark/Moorpark City Transit alleging Title VI violation has been investigated.

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

Shaun Kroes
Public Works Program Manager
City of Moorpark
799 Moorpark Avenue
Moorpark, CA 93021
Office: 805-517-6257
Email: skroes@moorparkca.gov

Sample Letter Notifying Complainant that the Complaint is Not Substantiated

Today's Date

Ms. Jo Do
1234 High St.
Moorpark, CA 93021

Dear Ms. Doe:

The matter referenced in your complaint of _____(date) against the City of Moorpark/Moorpark City Transit 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 has analyzed the materials and facts pertaining to your case for evidence of the City's 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 calendar days of receipt of this final written decision from the City, 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 the City. If I can be of assistance to you in the future, do not hesitate to contact me.

Sincerely,

Shaun Kroes
Public Works Program Manager
City of Moorpark
799 Moorpark Avenue
Moorpark, CA 93021
Office: 805-517-6257
Email: skroes@moorparkca.gov

ATTACHMENT 2

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

Título VI Forma de Quija

El Título VI de los derechos civiles de 1964 exige que “Ninguna persona en los Estados Unidos, per 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 asistirnos en el procesamiento de su queja. Por favor avísenos 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?:

c. Raza/Color: Sí No

d. 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

ATTACHMENT 3

Public Participation Plan

Ventura County Transportation Commission
Title VI Program

Transit-Related Title VI Investigations, Complaints, and Lawsuits

The Ventura County Transportation Commission has had no Title VI discrimination complaints filed in the past twelve years.

Public Participation Plan

Purposes of This Plan

This Public Participation Plan was created during the development of Ventura County Transportation Commission's (VCTC) Title VI Program. This plan includes strategies for VCTC's outreach and participation activities. Of particular importance, this plan includes enhancing strategies for engaging minority and Limited English Proficient (LEP) individuals in VCTC's transportation-related planning efforts to ensure that all groups are represented and their needs considered.

VCTC is committed to ensuring it serves the county of Ventura consistently and in the most cost-efficient and appropriate manner within available resources. Through conversation and collaboration with riders, prospective riders, and the larger surrounding community, VCTC will be able to assess the quality of its service, measure potential impacts to the community from VCTC's transportation-related initiatives or proposed initiatives, and ensure that it is providing a valuable and accessible service.

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 surrounding community, its riders, and potential riders. As projects vary in time and size, the public participation process may vary for each, as well as the extent of public participation. 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 any project, staff will identify which strategies will be appropriate and effective for that given task, and, develop an approach. For larger projects, those conducted by contractors, part of the RFP requirements and criteria for scoring proposals will include 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 resident, transit riders and potential transit riders have equal access and opportunity to participate in transportation planning and decision-making. These also provide strategies for soliciting input and engaging various communities, including racial minorities

and LEP individuals.

Minimum Outreach Requirements

- Notice for public events may include posters, email blasts to agency level stakeholders, media releases to local papers, or radio announcements if funding allows.
- Any notices will be posted at least one week prior to the public event.
- Notices may be posted at the VCTC offices, on buses and at bus shelters as is appropriate, at key community centers and transfer locations.
- Information about public participation opportunities will also be posted on VCTC's website at least one week prior to the event.
- Comments will be accepted at public outreach events, by mail, by email and by phone to ensure that all populations have the opportunity to participate.

Outreach Methods to Engage Minority and Limited English Proficient Populations

- VCTC will continue to produce its transit schedules in both English and Spanish
- Notices in Spanish will be developed and posted along with English notices.
- VCTC will continue cultivating relationships with community agencies that serve LEP populations.
- VCTC will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.
- The VCTC has bilingual English/Spanish staff members who can translate for LEP individuals that call/visit and need language assistance.
- VCTC will ensure that non-English language interpretation will be available at any public transit meeting or transit workshop as is appropriate and necessary.
- Public outreach events may include attending existing community meetings and other community activities in order to invite participation from LEP populations who may not attend VCTC hosted public events.

VCTC annually holds transit listening sessions in the evenings in the Heritage Valley, the City of Oxnard, and the City of Moorpark to review input from these communities, in addition to meeting held at the VCTC meeting site in Camarillo. The Heritage Valley and the City of Oxnard are the two areas in the county with substantial minority and Spanish speaking populations. Bilingual staff participates at all transit related public meetings, and an announcement is made in Spanish as well as English regarding the availability of staff to translate or interpret for the LEP attendees.

When the VCCTC considers fare changes, it takes a number of actions including:

- Issuing press releases to all media outlets, including those providing information in other than English

- advertising in Spanish as well as English publications
- surveying riders in both English and Spanish
- making staff available to community groups and schools

The Commission Transit staff works with the community groups who represent and coordinate the low income communities, including ASERT, CAUSE, One Step Una Vez, as well as more traditional organizations such as the County Housing Authority and the Area Agency on Aging.

As discussed in the Language Assistance Plan, approximately 39% of people five years or older in Ventura County speak a language at home other than English. Spanish is the most popular language spoken by those who do not speak English very well. Almost 31% of the population speaks Spanish, and about 13% speak Spanish at home and English less than very well. The Safe Harbor Provision of Title VI, covers languages spoken by over 5% of the population (about 40,000 people) or 1,000 individuals, whichever is less. There are three language groups that might be subject to the Safe Harbor Provision because they speak English less than very well. They are: Tagalog, spoken by 6,087 individuals (0.8% of the population), Chinese, spoken by 3,381 individuals (0.4%) and Vietnamese, spoken by 2,042 individuals (0.3%). The category for Chinese includes multiple separate dialects, so it is unlikely that any group of Chinese speakers falls under the Safe Harbor Provision threshold.

ATTACHMENT 4

Ventura County Transportation Commission
Title VI Program

Language Assistance Plan

This Language Assistance Plan was developed during the process of preparing the VCTC Title VI Program to ensure that VCTC services are accessible to Limited English Proficient (LEP) individuals. LEP is defined as having a limited ability to read, write, speak or understand English. In compliance with regulations from the U.S. Department of Transportation, and to avoid discrimination against LEP persons on the grounds of national origin, VCTC will take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, free of charge.

The plan has been prepared in accordance with:

- Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which prohibits discrimination against individuals based on race, color, and national origin and includes meaningful access to LEP customers
- Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency (August 2000)", indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin's 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 VCTC as both a recipient of Federal transit funds and as a programming agency responsible to distribute Federal transit funds to the different public and private transportation providers in this region.

VCTC's Title VI Program was prepared in May 2018 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012. VCTC Title VI Program Administrator is:

Peter DeHaan, Director of Programming
Ventura County Transportation Commission
950 County Square, Suite 207
Ventura CA, 93003
805.642.1591
Email: pdehaan@goventura.org

More information about VCTC Title VI Program is available at www.goventura.org/title-vi

Overview of VCTC

VCTC has evolved to administer and act as:

- **Regional Transportation Planning Agency (RTPA).** VCTC is responsible for multi-modal transportation planning, programming, and fund allocation, as required by the state statutes. This includes the annual allocation of Transportation Development Act funds, as well as all federal and local funds for highway, transit, rail, bicycle and other transportation projects.
- **Congestion Management Agency (CMA).** The cities and county have designated VCTC as the CMA for Ventura County. In this capacity, VCTC is responsible for the development and implementation of the countywide Congestion Management System (CMS) required in all urban counties. In the past, the State of California and the federal government required the CMA to prepare a Congestion Management Program (CMP), which provides local agencies and private developers the procedures and tools necessary to manage and decrease traffic congestion in the County. Although this is no longer a state-level requirement, VCTC continues to update and monitor its CMP.
- **Consolidated Transportation Services Agency (CTSA).** VCTC is the state mandated facilitator charged with the development and implementation of regional coordination of transit and paratransit services and improvement of social service transportation to seniors, persons with disabilities, the young and the low-income disadvantaged.
- **Airport Land Use Commission (ALUC).** In this capacity, VCTC is responsible under state law to protect public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations.
- **Ventura County Service Authority for Freeway Emergencies (SAFE).** As the SAFE, VCTC is responsible for the installation, operation, and administration of the system of roadside call boxes in Ventura County that is financed by a \$1.00 per year fee on all motor vehicles registered within the county.
- **County Transportation Commission (CTC).** As the CTC, VCTC leverages state and federal transportation dollars and provides assistance during project implementation. VCTC's responsibilities include preparing the State Transportation Improvement Program (STIP) for submittal to the State, participation in the AB1246 Committee, performing short-range capital and service planning, and preparing long-range expenditure plans for transportation programs in the county.
- **County Transportation Authority (CTA).** VCTC was designated the CTA per California Public Utilities Code 130050.1. In the role as the CTA, VCTC determines the preferred method and distribution of sales tax revenue for transportation improvements, when applicable.
- **VCTC Intercity Bus (formerly VISTA).** VCTC provides intercity bus service, with connections between the cities of Ventura County and neighboring Santa Barbara and Los Angeles Counties. With a fleet of 33 over-the-road coach buses, VCTC Intercity Bus operates 1.5 million revenue

miles and carries 787,000 passengers annually¹. The cities served include: Ventura, Oxnard, Simi Valley Thousand Oaks, Moorpark, Camarillo, Santa Paula and Fillmore.

- **Valley Express Transit Service.** As of March (2015)² VCTC manages and administers the Valley Express Transit Service.

VCTC's service area includes a population of about 800,000 persons residing in over 1,845 square miles of land. The county's make-up ranges from urban and suburban cities to rural towns and farming communities, and varies significantly between the East and West portions of the county.

Language Assistance Goals

VCTC's goal is to provide meaningful access for LEP current and potential customers of VCTC services, information and materials by developing a Language Assistance Plan and by regular evaluation of its method and strategies.

Results of the Four Factor Analysis

In order to prepare this plan, VCTC undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following:

1. The number or proportion of LEP persons to be served or likely to be encountered in a VCTC program, activity or service.
2. The frequency with which LEP persons come in contact with VCTC programs, activities or services.
3. The nature and importance of programs, activities or services provided by VCTC to the LEP population.
4. The resources available to VCTC and overall cost to provide LEP assistance.

A summary of the results of the VCTC four-factor analysis is in the following section.

Factor 1: The number or proportion of LEP persons to be served or likely to be encountered in a VCTC program, activity or service

VCTC used available American Community Survey (Table 1) and California's Department of Education data (Attachment C) to identify LEP populations within its service area.

The American Community Survey provides information on the number of people who speak English "less than very well" also referred to as Limited English Proficient persons. Table 2 shows the languages spoken at home, by ability to speak English, for persons five years of age and older. According to the 2016 survey results, approximately 39% speak a language at home other than English. Spanish is the

¹ Annual revenue miles and passengers reflect FY15/16 data

² Prior to March 2015, VCTC Intercity (VISTA) provided dial-a-ride service for the general public in and between Fillmore and Santa Paula

most popular language spoken by those who do not speak English very well. Almost 31% of the population speaks Spanish, and about 13% speak English less than very well. The Safe Harbor Provision of Title VI, covers languages spoken by over 5% or 1,000 individuals, whichever is less. There are three groups of people who do not speak English very well and might be subject to the Safe Harbor Provision. They are people who speak: Tagalog, 6,087 individuals (0.8% of the population), Chinese, 3,381 individuals (0.4%) and Vietnamese, 2,042 individuals (0.3%). The category for Chinese includes multiple separate dialects, so it is unlikely that any group Chinese speakers fall under the Safe Harbor Provision.

TABLE 1
S1601: LANGUAGE SPOKEN AT HOME
2016 American Community Survey 1-Year Estimates

	Ventura County, California					
	Total		Percent of specified language speakers			
			Speak English only or speak English "very well"		Speak English less than "very well"	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
Population 5 years and over	797,875	(X)	672,711	84.3%	125,164	15.7%
Speak only English	486,210	60.9%	(X)	(X)	(X)	(X)
Speak a language other than English	311,665	39.1%	186,501	59.8%	125,164	40.2%
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	245,273	30.7%	141,359	57.6%	103,914	42.4%
Other Indo-European languages	23,857	3.0%	19,937	83.6%	3,920	16.4%
Asian and Pacific Island languages	35,564	4.5%	22,133	62.2%	13,431	37.8%
Other languages	6,971	0.9%	3,072	44.1%	3,899	55.9%
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	555,009	(X)	507,167	91.4%	47,842	8.6%
Speak only English	389,493	70.2%	(X)	(X)	(X)	(X)
Speak a language other than English	165,516	29.8%	117,674	71.1%	47,842	28.9%
Spanish	123,158	22.2%	86,898	70.6%	36,260	29.4%
Other languages	42,358	7.6%	30,776	72.7%	11,582	27.3%

TABLE 2

**B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over
2016 American Community Survey 1-Year Estimates**

	Ventura County, California	
	Estimate	Percent
Total:	797,875	
Speak only English	486,210	60.9%
Spanish:	245,273	30.7%
Speak English less than "very well"	103,914	13.0%
Tagalog (incl. Filipino):	15,408	1.9%
Speak English less than "very well"	6,087	0.8%
Chinese (incl. Mandarin, Cantonese):	7,859	1.0%
Speak English less than "very well"	3,381	0.4%
Hindi:	4,052	0.5%
Speak English less than "very well"	599	0.1%
Vietnamese:	3,753	0.5%
Speak English less than "very well"	2,042	0.3%
German:	2,716	0.3%
Speak English less than "very well"	147	0.0%
French (incl. Cajun):	2,386	0.3%
Speak English less than "very well"	183	0.0%
Tamil:	2,070	0.3%
Speak English less than "very well"	226	0.0%
Persian (incl. Farsi, Dari):	2,040	0.3%
Speak English less than "very well"	394	0.0%

The California Department of Education’s survey (Attachment C) provides an additional source of data to identify possible LEP populations. While the State’s school data has its shortcomings in that it misses households and individuals without school age children, double counts households with two or more children in the schools, and in some cases misses households where the school children are fluent in English, but other members of the household are not, it provides valuable information about minority and immigrant populations.

Looking at the county totals based on data from the California Department of Education’s annual census of students, it appears that the most frequently spoken language other than English is Spanish. Data for school year 2016 – 2017 for the County of Ventura show a school population of 139,104. The number of Spanish speaking English Learners is 30,274 (21.8 percent of the total school population). The next largest groups of non-English speakers were Mixteco (which may not have an accepted written form), 952 (0.7%); Filipino, 299 (0.2%); Arabic, 210 (0.15%); and Vietnamese, 176 (0.13%).

Given the very low percentages of people who speak English less than “very well” other than Spanish

language speakers, and the fact that that in the past 15 years, VCTC has reported no phone calls, office walk-ins, or written requests for languages other than English or Spanish, at this time there are no plans to expand the printed materials beyond those two languages. Furthermore, VCTC is looking into the feasibility of adding Google Translate or a similar service to its web site. Such a service would allow visitors to the web site to request translations of web pages and documents.

Factor 2: The frequency with which LEP persons come in contact with VCTC programs, activities or services

In an effort to inform LEP populations, VCTC works with local advocacy groups such as Central Coast Alliance United for a Sustainable Economy (CAUSE), Alliance for Sustainable and Equitable Regional Transit (ASERT) and One Step A La Vez.

Although Title VI regulations for LEP individuals cover only written materials, VCTC makes a considerable effort to provide assistance to Spanish speakers at meetings. A Spanish interpreter has been used for all of the VCTC Unmet Transit Hearing Board meetings and community transit “listening sessions”. VCTC will continue its practice of having a Spanish interpreter available if requested 3 days (72 hours) before any meeting. VCTC has also distributed all transit surveys in both Spanish and English.

The VCTC Regional Transit Information Center (RTIP) employs a bilingual staff to field phone calls related to transit within Ventura County. Calls are predominately in English, with calls in Spanish making up less than 20 percent of the total number. VCTC is looking into the feasibility and potential usefulness of having a contracted interpretation service available to RTIP staff.

Additionally, the VCTC Intercity dispatch (which is contracted through Roadrunner) and the Valley Express reservation center have bilingual staff members. Seventy-five percent (75%) of the VCTC Intercity Transit service drivers are bilingual. Of those, 83% speak both English and Spanish, while seventeen percent (17%) speak both English and Tagalog. This is appropriate, since the Tagalog speaking community is almost exclusively in the City of Oxnard.

The Valley Express, operating only in the non-urban portions of the Santa Clara (Heritage) Valley, has fifty-seven percent (57%) of its drivers, eighty-three percent (83%) of the dispatchers, and sixty-six percent (66%) of the management speak both English and Spanish.

Over the past decade VCTC has printed vital materials regarding the Commission or its programs, rideshare materials (including Vanpool and Guaranteed Ride Home), on-board surveys and Unmet Transit Needs information in both English and Spanish.

Future LEP outreach efforts will include continuing to identify key organizations or contacts in the community that serve LEPs.

The frequency with which LEP persons come in contact with VCTC transit programs, activities or

services varies by individual circumstances. A very small proportion of the population uses regional or local transit services. According to the American Community Survey 2016 estimates, only about one percent of workers 16 years or older use public transportation. Transit is used by people who don't work as well, but even considering those people, the number of transit users is still relatively small.

S0804: MEANS OF TRANSPORTATION TO WORK BY SELECTED CHARACTERISTICS FOR WORKPLACE GEOGRAPHY

2016 American Community Survey 1-Year Estimates

	Ventura County, California						
	Total		Car, truck, or van - - drove alone		Car, truck, or van - - carpoled		Public transportation (excluding taxicab)
	Estimate	Estimate	Percent	Estimate	Percent	Estimate	Percent
Workers 16 years and over	374,613	287,261	76.7%	48,330	12.9%	4,138	1.1%

Factor 3: The nature and importance of programs, activities or services provided by VCTC to the LEP population

VCTC understands that its services are utilized for transportation to work, school, shopping, medical appointments and other life-sustaining activities. For transit-dependent individuals, VCTC services are extremely important. For this reason, VCTC is committed to translating vital documents relating to its service. Vital documents are those that demonstrate where and how to use VCTC Intercity bus, how to access services and additional information, and information about VCTC's Title VI program. At this time VCTC does not have the funds required to translate all written materials -- such an undertaking would incur substantial costs and require substantial resources.

In addition, VCTC will continue to offer interpretation at public meetings when possible. Providing interpretation services to allow LEP populations to participate by obtaining information about VCTC services has been a core activity at VCTC since its creation. VCTC has reached out to LEP populations through attendance at planning workshops sponsored by CAUSE and ASERT, which has helped to access LEP persons and bring them into the VCTC planning process.

Factor 4: The resources available to VCTC and overall cost to provide LEP assistance

As VCTC serves a vast area, outreach will need to be varied and, at times, event specific. The VCTC Public Participation Plan lays out the types of public outreach activities that will be undertaken for the various levels of public events. VCTC will continue working with local advocacy groups like CAUSE and ASERT to ensure contact with LEP populations; there is little to no cost to the agency to do this. Strategies such as language advertisements on the radio will be utilized if funding becomes available.

VCTC's Regional Transit Information Center (RTIC) has bi-lingual Spanish-speaking staff. This plus other

RTIC costs related to translation services cost VCTC about \$50,000 per year.

Implementation Plan

Language Assistance Measures

VCTC will continue to use a variety of techniques or practices to provide meaningful, early and continuous opportunities for all interested County residents to participate in the dialogue that informs key decisions, regardless of language barriers. This is done in a number of ways, including:

General Measures or Practices

- Review prior experiences with LEP populations to determine the types of language services that are needed.
- Robust use of "visualization" techniques, including maps, charts and photographs to illustrate trends, choices being debated, etc.
- Translate to Spanish as a matter of routine selected printed materials for the various traveler services provided by VCTC (VCTC Intercity transit services, Valley Express services, fare media and other farebox information, transit seat drops, freeway call box information, ADA certification materials and services, transit meeting notices, and regional Rideshare materials).
- Work to involve in VCTC's activities non-profit groups that advocate on behalf of persons with limited English proficiency.
- Identify areas within the service area with high concentrations of LEP individuals
- Include, as appropriate, limited-English speaking populations in random-digit telephone surveys and/or transit rider surveys.
- Translation of vital documents - including certain news releases, brochures, fact sheets, portions of the Heritage Valley transit plan, and Unmet Transit Needs notices.
- All translated documents will be posted onto the VCTC website; future plans could include installing the website translator gadget powered by Google Translate or similar gadgets on VCTC's homepage
- Ensure competency of translators; have interpreters available, if requested 3 days in advance (72 hours) at meetings. Contract with a language translation firm for on-call assistance translating documents.
- Provide multi-lingual staff at the VCTC Regional Transit Information Center.
- Encourage multi-lingual staff at the transit dispatch offices and transit operators (as of April, 2018:
 - Valley Express: 60% of the drivers and 80% of the dispatchers and are bilingual in English and Spanish
 - VCTC Intercity: 75% of the drivers are bilingual (80% speak Spanish, 10% speak Tagalog), and all of the dispatchers are bilingual in both Spanish and English

Local Community Media

- Work with Spanish language media outlets to place articles about VCTC's work or announce participation opportunities.
- Purchase display ads in Spanish language community newspapers to announce public hearings.

Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters may be available as needed.

VCTC will continue to develop relationships with organizations that serve LEP individuals.

Monitoring and Updating of the LAP Plan

VCTC will monitor requests for translations and adjust practices to meet demand while maintaining a basic level of access by LEP populations to key programs and documents. VCTC's LAP Plan will be updated periodically as required by U.S. DOT and as needed to reflect significant changes. At minimum, the plan will be reviewed and updated when data from new ACS counts are available, or when it is clear that higher concentrations of LEP individuals are present in the VCTC region. Updates will include the following:

- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area per the latest Census reports at the community level
- Determination as to whether the need for translation services has changed or whether a change in the contractor used for translation services is warranted based on geographical proximity or availability at times needed
- Determine whether VCTC's financial resources are sufficient to fund bilingual or multi-lingual language assistance resources needed
- Determine whether VCTC has fully complied with the goals of this LAP Plan
- Determine whether complaints have been received concerning VCTC's failure to meet the needs of LEP individuals
- Regularly assess the effectiveness of how VCTC communicates with LEP individuals through use of surveys, conversations with advocacy groups etc.

Staff Training

VCTC works to instill its staff with an awareness of and sensitivity to the needs of LEP residents. The following training will be provided to VCTC staff:

1. Information on the VCTC Title VI Procedures and LEP responsibilities

2. Description of language assistance services offered to the public
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

Dissemination of the VCTC LAP Plan

A link to the VCTC LAP Plan and the Title VI Procedures is included on the VCTC website at www.goventura.org/title-vi

Any person or agency may request a copy of the plan via telephone, fax, mail, e-mail or in person and shall be provided a copy of the plan at no cost. LEP individuals may also request copies of the plan in translation.

Questions or comments regarding the LAP Plan may be submitted to the Ventura County Transportation Commission, Title VI Coordinator:

Peter DeHaan, Director of Programming
VCTC
950 County Square Drive, Suite 207
Ventura, CA 93003
Office: 805-642-1591
Email: pdehaan@goventura.org

ATTACHMENT 5

RESOLUTION NO. 2019-3840

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MOORPARK, CALIFORNIA, ADOPTING AN UPDATED TITLE VI PLAN, INCLUDING ADOPTION OF CERTAIN ELEMENTS OF THE VENTURA COUNTY TRANSPORTATION COMMISSION (VCTC) TITLE VI PROGRAM FOR MOORPARK CITY TRANSIT AND RESCINDING RESOLUTION NO. 2013-3247

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 December 4, 2013, the City Council adopted Resolution No. 2013-3247, adopting certain elements of the VCTC 2009 Title VI Program; and

WHEREAS, on April 6, 2018, the VCTC adopted an updated Title VI Program; and

WHEREAS, the City has updated its Title VI Program; and

WHEREAS, the City is eligible to adopt certain elements of the updated VCTC Title VI Program to make the City compliant with Title VI requirements and has incorporated them into the City's Title VI Program.

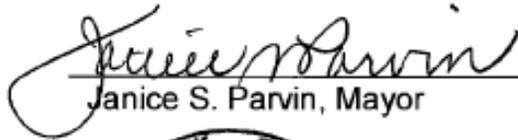
NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF MOORPARK DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. Resolution No 2013-3247 is hereby rescinded upon the effective date of this resolution adopting an updated Title VI Program.

SECTION 2. Authorizes the City to adopt the updated Title VI Program, incorporating the following elements of the VCTC Title VI Program: Notice to Beneficiaries, Title VI Complaint Procedures, Language Assistance Plan (Limited English Proficiency Plan), and Public Participation 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 4th day of September, 2019.



Janice S. Parvin, Mayor

ATTEST:



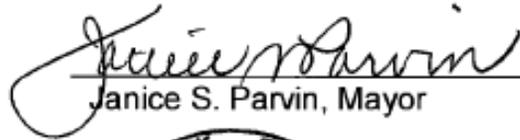
Ky Spangler, City Clerk



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

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 4th day of September, 2019.



Janice S. Parvin, Mayor

ATTEST:



Ky Spangler, City Clerk



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

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

I, Ky Spangler, City Clerk of the City of Moorpark, California, do hereby certify under penalty of perjury that the foregoing Resolution No. 2019-3840 was adopted by the City Council of the City of Moorpark at a regular meeting held on the 4th day of September, 2019, and that the same was adopted by the following vote:

- AYES: Councilmembers Enegren, Mikos, Pollock, Simons, and Mayor Parvin
- NOES: None
- ABSENT: None
- ABSTAIN: None

WITNESS my hand and the official seal of said City this 4th day of September, 2019.



Ky Spangler, City Clerk
(seal)



Note: Resolution 2019-3840 includes entire Title VI program as an Exhibit.