



City of Simi Valley 2022 Title VI Program Update

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Point of Contact

Ben Gonzales
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, CA 93063
(805) 583-6482

Prepared by

Moore & Associates, Inc.
25852 McBean Pkwy. #187
Valencia, CA 91355
(888) 743-5977

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Section 1 | Introduction

The City of Simi Valley operates Simi Valley Transit. The purpose of the City of Simi Valley Title VI Program is as follows:

- a. Ensure that the level and quality of public transportation service is provided in a non-discriminatory manner;
- b. Promote the full and fair participation in public transportation decision-making without regard to race, color, or national origin; and
- c. Ensure the meaningful access to transit-related programs and activities by persons with limited English proficiency.

Pursuant to the Federal Transit Administration's Circular FTA C 4702.1B dated October 1, 2012, Simi Valley Transit is subject to the General Requirements of Chapter III and the system-wide service standards and system-wide service policies set forth for Fixed-Route Transit Providers in Chapter IV. The remaining requirements of Chapter IV are not applicable because Simi Valley Transit does not meet the threshold of operating 50 or more fixed route vehicles in peak service and is not located in an Urbanized Area with a population of 200,000 or greater.

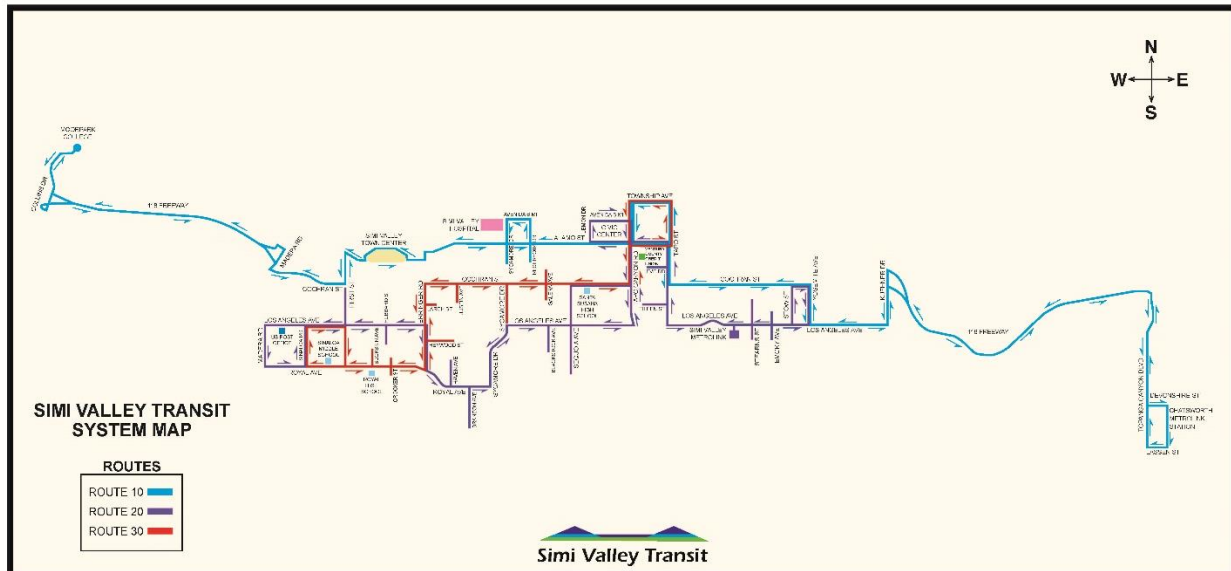
[Description of Transit Service](#)

The City of Simi Valley's transit service operates almost exclusively in the City of Simi Valley, as identified in the following map.

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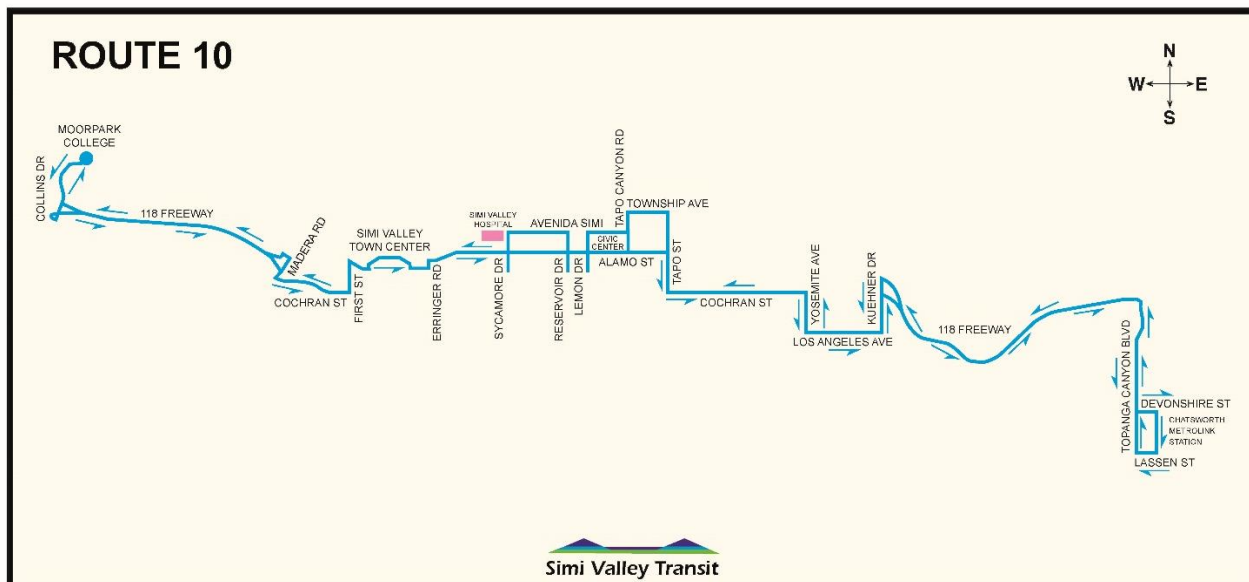
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Exhibit 1.1 Simi Valley Transit System Map



Simi Valley Transit's Route 10 is specifically designed to improve access to transportation services between Ventura County bus transportation systems and the LA Metro bus system.

Exhibit 1.2 Simi Valley Transit Route 10 Service Area Map



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Fixed-route service is provided from 5:00 a.m. through 8:09 p.m., with headways (frequency) ranging from 24 minutes during peak hours to 129 minutes on Saturday. Three routes operate Monday through Saturday. Service does not operate on Sunday or designated holidays (New Year’s Day, Memorial Day, July 4th, Labor Day, Thanksgiving Day, and Christmas Day).

Exhibit 1.3 Simi Valley Transit Service Information

Route	Service Days	Service Span	Minimum Frequency	Maximum Frequency	Route Duration	Number of Vehicles
Route 10	Mon. – Fri.	5:00 a.m. – 8:09 p.m.	24 min.	105 min.	62 min.	2
	Sat.	5:30 a.m. – 8:00 p.m.	129 min.		62 min.	
Route 20	Mon. – Sat.	5:30 a.m. – 8:05 p.m.	30 min.	68 min.	54 – 64 min.	2
Route 30	Mon. – Sat.	5:30 a.m. – 8:00 p.m.	30 min.		60 min.	2

All transit vehicles are fully wheelchair accessible and equipped with bicycle racks. Reduced fares are available for seniors age 65 years and older, persons with disabilities, and Medicare cardholders. The base price for a one-way trip is \$1.50.

Exhibit 1.4 Simi Valley Transit Fixed-Route Fares

Fare Type	Regular (Full) Fare	Reduced Fare
Single trip	\$1.50	\$0.75
Unlimited day pass	\$5.00	\$2.50
21-ride pass	\$25.00	
25-ride pass		\$15.00
Unlimited monthly pass	\$50.00	\$25.00

Children five years and younger ride free with a fare-paying parent, guardian, or responsible person age 12 and older. Personal care attendants may accompany ADA-certified passengers for free. Simi Valley Transit also accepts the VCTC 31-Day Pass.

Complementary ADA and Senior Paratransit service is provided to locations within ¼ mile of the fixed-route service. The service operates Monday through Friday from 5:15 a.m. to 8:00 p.m. and Saturday from 5:30 a.m. to 7:45 p.m. The one-way fare of two dollars is required of all passengers except personal care attendants for ADA-certified customers.

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Section 2 | Title VI Notice and Locations


Title VI Notice to the Public

The City of Simi Valley Title VI Notice to the Public is currently posted at the locations identified in Exhibit 2.1.

Exhibit 2.1 Noticing Locations

Location	Address
Simi Valley City Hall	2929 Tapo Canyon Road
Simi Valley Senior Center	3900 Avenida Simi
Simi Valley Transit	490 W. Los Angeles Avenue
Onboard fixed-route and paratransit vehicles	
Simi Valley Transit website	https://www.simivalley.org/departments/public-works/simi-valley-transit

Exhibit 2.2 Title VI Notice to the Public (English)




Simi Valley Transit

Simi Valley Transit 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.

Any person who believes that he or she has been subjected to discrimination on the basis of race, color, or national origin may contact Simi Valley Transit at (805) 583-6456.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839.

Exhibit 2.3 Title VI Notice to the Public (Spanish)



Simi Valley Transit

Simi Valley Transit esta comprometido en asegurar que ninguna persona sea excluida de participacion en, o negada los beneficios de sus servicios basado por motivos de raza, color o origen nacional, como protegido del Título VI de la ley de Derechos Civiles de 1964, como enmendada.

Cualquier persona que cree que ha sido discriminada por motivos de raza, color o origen nacional, puede comunicarse con Simi Valley Transit a (805) 583-6456.

Un demandante puede presentar una queja con la Administracion Federal de Transito por medio de la Oficina de Derechos Civiles, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1893.

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Exhibit 2.4 Title VI Notice to the Public (inside buildings)

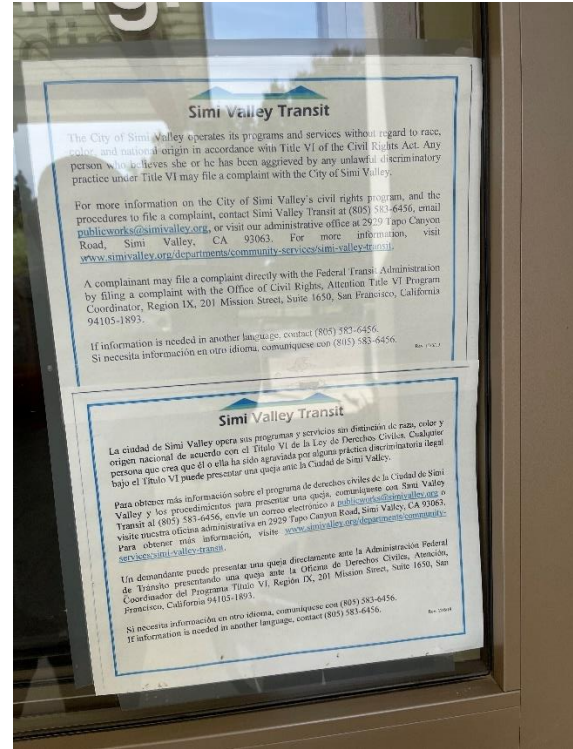
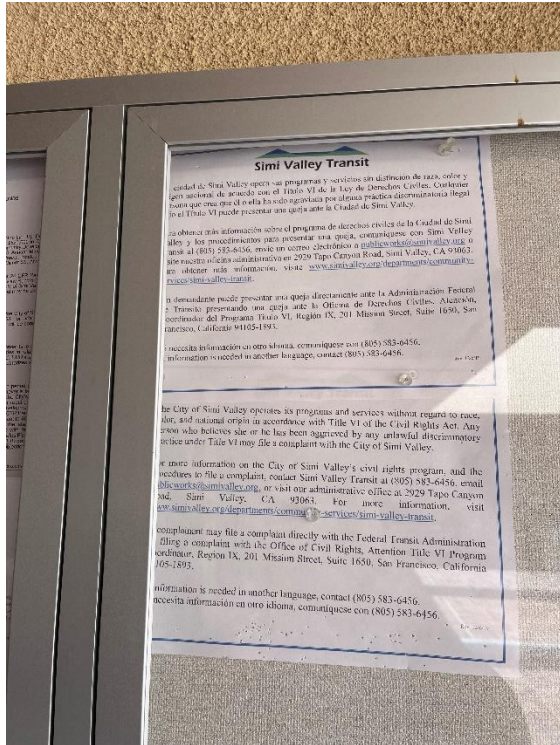
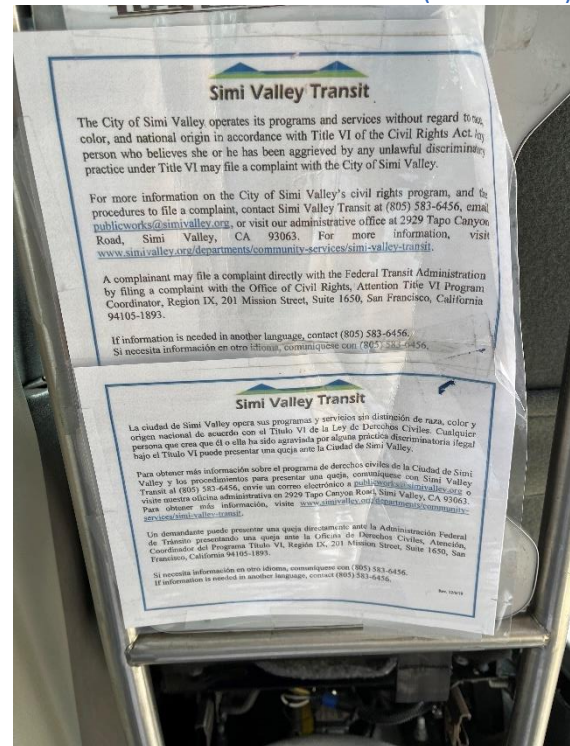
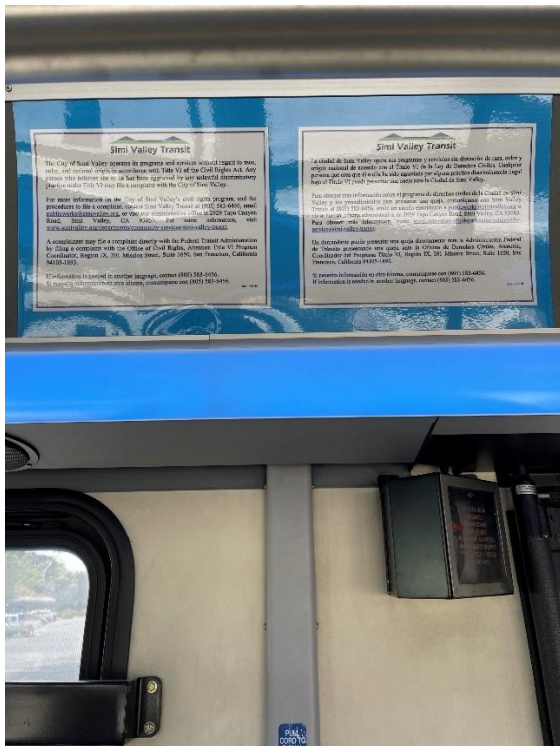


Exhibit 2.5 Title VI Notice to the Public (on vehicles)



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Section 3 | Title VI Complaint Procedures and Form

The City of Simi Valley/Simi Valley Transit 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 routing, scheduling, or quality of transportation service that Simi Valley Transit furnishes, on the basis of race, color, or national origin.
- Frequency of service, age, and quality of Simi Valley Transit 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.

Currently, the Complaint Form and Complaint Procedures are only available in English. Translation of these documents into Spanish is included as part of the Language Assistance Plan in Section 8.

How to File a Complaint

Any person who believes 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 of Simi Valley. 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.

The City of Simi Valley's Title VI Complaint Form (Exhibit 3.1) may be used to detail the complaint, but is not mandatory. Complaint forms may be obtained by calling (805) 583-6739. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English. Written complaints may be sent to:

City of Simi Valley
Title VI Officer/Risk Manager
2929 Tapo Canyon Road
Simi Valley, CA 93063

In addition to filing under the Title VI complaint process at the City of Simi Valley, a complainant may file a Title VI complaint with the Federal Transit Administration, Office of Civil Rights, Region LX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839.

How Complaints are Processed

All complaints alleging discrimination based on race, color, or national origin in services provided by the City of Simi Valley will be investigated promptly. The City will acknowledge, in writing, the receipt of the complaint within ten (10) business days. Based upon the receipt of all information required, the investigation will be completed within ninety (90) calendar days of receipt. If the City submits a written request to the complainant to provide additional information, the receipt of additional relevant information may expand the timing of the complaint resolution.

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Upon conclusion of the Title VI Officer's investigation, he/she will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

Title VI Investigations, Complaints and Lawsuits

To ensure compliance with 49 CFR, Section 21.9(b), the Title VI Officer maintains a log of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the City of Simi Valley/Simi Valley Transit that allege discrimination on the basis of race, color, or national origin. The log includes 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 by the City of Simi Valley in response to the investigation, lawsuit, or complaint. The City's log for the prior three fiscal years is available in Section 4.

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Exhibit 3.1 Title VI Complaint Form

Title VI Complaint Form



Simi Valley Transit (SVT) values you as a rider!

SVT is committed to responsive customer service and to operating its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			

Section IV:			
Have you previously filed a Title VI complaint with this agency?		Yes	No

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Title VI Complaint Form



Section V:

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 all that apply:

Federal Agency _____

Federal Court _____ State Agency _____

State Court _____ Local Agency _____

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

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint. If you have questions about this form or the complaint process, please call (805) 583-6739.

Signature and date required below.

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Title VI Officer/Risk Manager

2929 Tapo Canyon Road

Simi Valley, CA 93063

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Section 4 | Title VI-related Investigations, Complaints, and Lawsuits

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

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

Since the development of the prior Title VI Program, there have been no complaints naming the City of Simi Valley/Simi Valley Transit resulting from perceived discrimination on the basis of race, color, or national origin with respect to service or other transit benefits. Any additional complaints requiring investigation as potential Title VI complaints will be logged using the following matrix.

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

Case/ Reference Number	Date MM/DD/YYYY	Summary (include basis of complaint: race, color, or national origin)	Current Status	Action(s) Taken
Active Investigations				
<i>None</i>				
Lawsuits				
<i>None</i>				
Complaints				
<i>None</i>				

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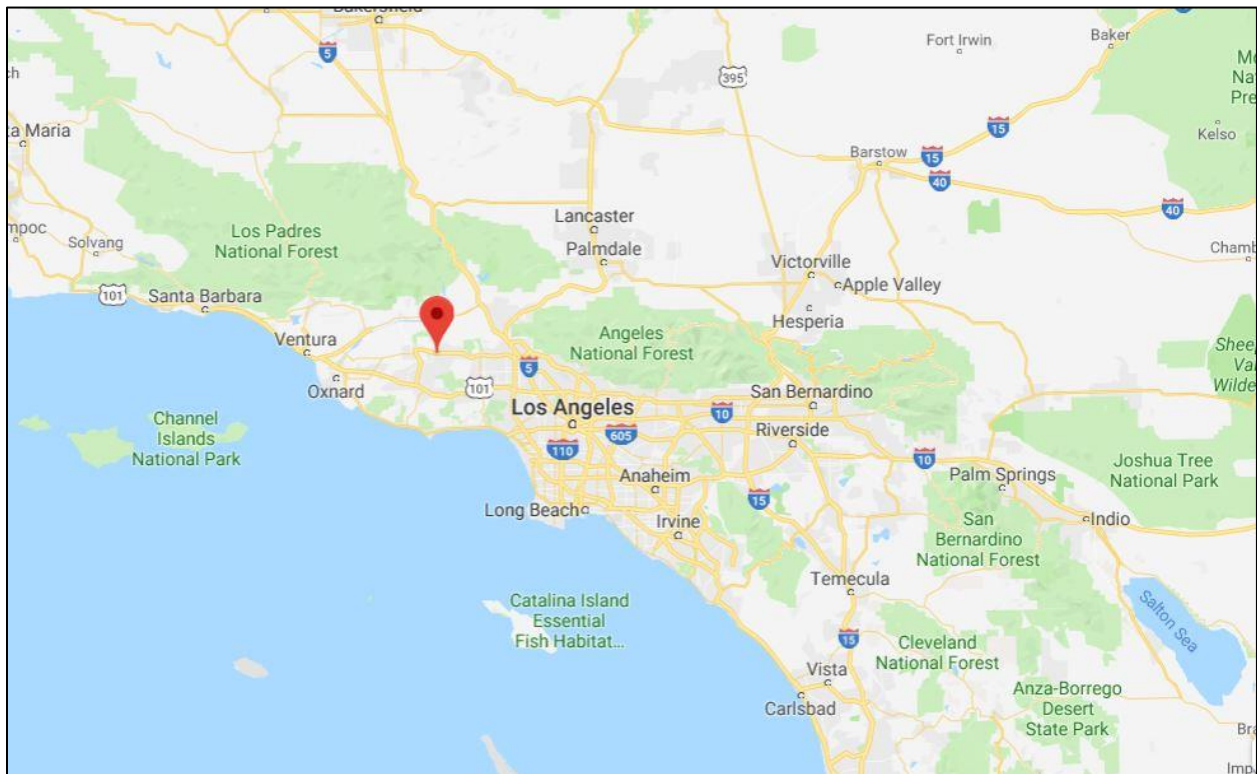
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Section 5 | Demographic Analysis of the Service Area

Description of Service Area

Simi Valley is located in the southeastern corner of Ventura County. It is surrounded by the Santa Susana mountain range and the Simi Hills. The primary arterial is State Highway 118, which travels east-to-west through the city. Simi Valley is also served by Metrolink and Amtrak rail via the Simi Valley Station.

Exhibit 5.1 Location of Service Area



The service area for Simi Valley Transit includes the City of Simi Valley as well as the Chatsworth Metrolink Station and Moorpark College. Only Route 10 serves destinations in Chatsworth and Moorpark as part of this intercity route. For the purposes of this Title VI Program, the City of Simi Valley is considered to be the service area.

Service Area Demographics

The service area demographic analysis describes Title VI-protected populations residing within Simi Valley Transit’s service area, including their approximate size and geographic distribution. Title VI-protected populations within the Simi Valley Transit service area include racial minorities and LEP persons. Specific groups considered include Hispanic/Latino residents and Spanish-speaking residents.

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The American Community Survey includes demographic and socio-economic data at various levels on multiple topics. For the purposes of this Title VI program, our assessment utilized the population estimates provided within the City of Simi Valley’s geographic boundaries. Totals may not equal the sum of the individual races/ethnicities due to rounding. Based on this data, approximately 26 percent of residents indicate their race as being minority (e.g., not white alone).

Exhibit 5.2 Racial Breakdown of Total Population of Service Area

Race	City of Simi Valley	
	Estimate	Percent
White alone	92,745	73.7%
Black or African American alone	1,789	1.4%
American Indian and Alaska Native alone	502	0.4%
Asian alone	15,038	12.0%
Native Hawaiian and Other Pacific Islander alone	316	0.3%
Some other race alone	5,830	4.6%
Two or more races	9,548	7.6%
Total	125,768	100.00%
Ethnicity		
Hispanic or Latino	30,860	24.5%

Source: 2020 American Community Survey 5-Year Estimates

With respect to the census, it does not differentiate Hispanic/Latino as a separate race. Instead, it allows that a person of any race may identify as Hispanic or Latino. As such, the Hispanic/Latino population is presented separately from the racial breakdown. Approximately 24.5 percent of individuals identify as Hispanic or Latino.

As the American Community Survey data presented in Exhibit 5.3 reveals, 73.9 percent of Simi Valley residents spoke only English at home, while 26.1 percent spoke another language. The Safe Harbor Provision of Title VI requires that translation of vital documents into languages when either five percent of the population or 1,000 residents (whichever is less) speaks English “less than very well.” While this threshold does not automatically trigger the Safe Harbor Provision, it does trigger close evaluation of that language via a four-factor analysis.

A total of 8.9 percent of Simi Valley residents speak English “less than very well,” with Spanish (6,211 individuals/5.2 percent) being the most frequently cited language. Spanish is also the only language that meets the Safe Harbor threshold. Other languages with populations speaking English “less than very well” are presented in the table below.

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Exhibit 5.3 Languages Spoken at Home

	City of Simi Valley	
	Population	Percent of Total
Total Speak Only English	87,928	73.9%
Total Speak Language Other than English	30,993	26.1%
Total Speak English "very well"	20,406	17.2%
Total Speak English less than "very well"	10,587	8.9%
Speak English less than "very well" – Detail		
Spanish	6,211	5.2%
Vietnamese	587	0.5%
Chinese	713	0.6%
Tagalog	372	0.3%
Other Asian and Pacific Islander Languages	763	0.6%
Arabic	154	0.1%
Korean	183	0.2%
Other Indo-European Languages	1,179	1.0%
German	65	0.1%
All Other Languages	188	0.2%

Recent changes to the data available through the American Community Survey have made it more difficult to identify potential LEP languages. For the 2020 ACS five-year estimates, Spanish, Vietnamese, Chinese, Tagalog, Arabic, Korean and German are identified individually. All other languages are grouped into three broad categories: Other Asian and Pacific Islander Languages, Other Indo-European Languages, and All Other Languages. These broad categories include the following languages (among others):

- Other Asian and Pacific Islander Languages: Japanese, Hmong, Khmer, Thai, Lao, Samoan, and Hawaiian.
- Other Indo-European Languages: French, Haitian, Italian, Portuguese, German, Yiddish, Greek, Russian, Polish, Serbo-Croatian, Ukrainian, Armenian, Persian/Farsi, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, Telugu, Tamil, and Kannada.
- All Other Languages: Navajo, other native languages of North America, Hebrew, Amharic, Somali, Yoruba, Igbo, Swahili, and Hungarian.

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

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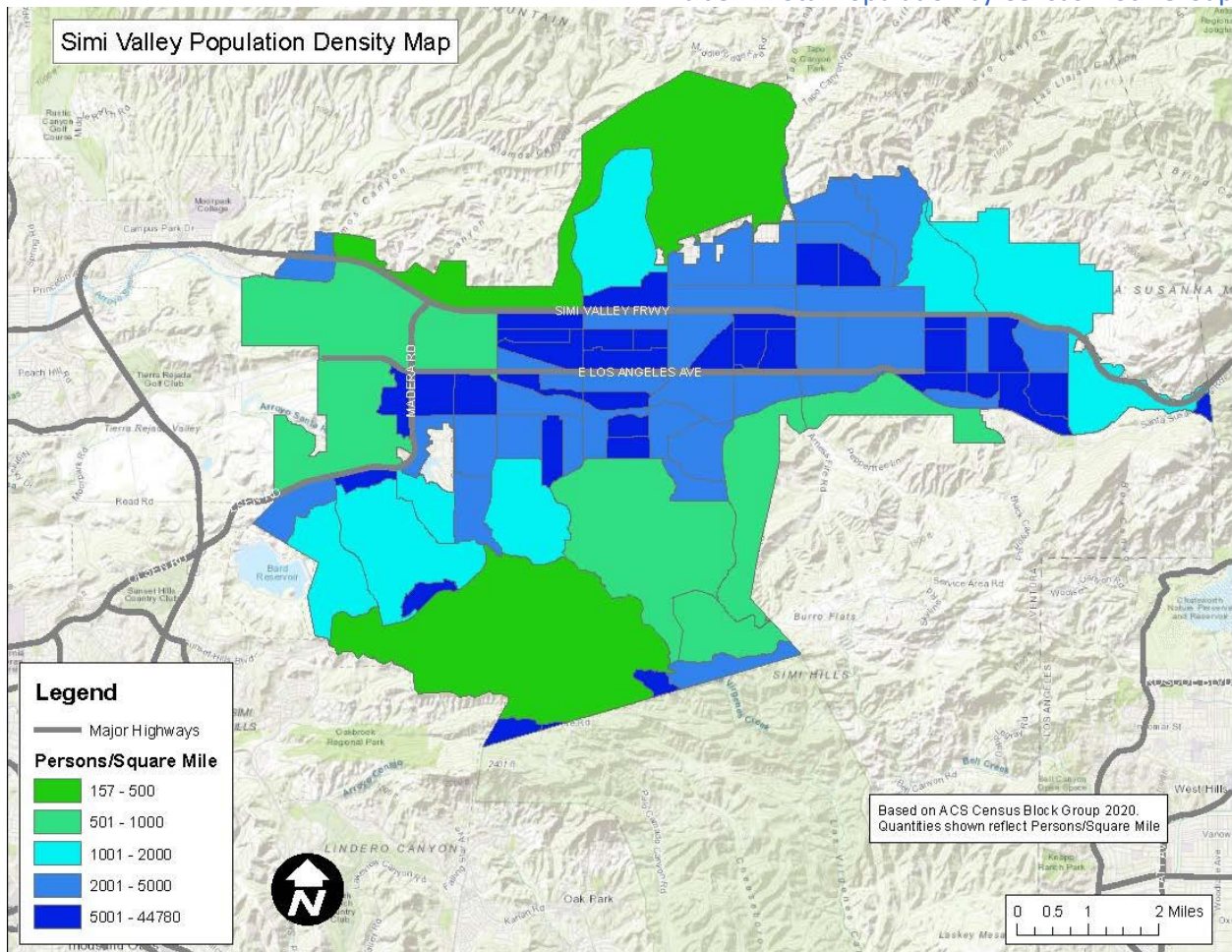
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Demographics by Census Block Group

Total Population

The highest densities of population are in census block groups primarily located in the central portion of the city, though there are also a few on the outer edges of the city's corporate boundary. The same pattern is noted for the next highest densities. Areas with the lowest densities are located in the far north and south regions of the city.

Exhibit 5.4 Total Population by Census Block Group



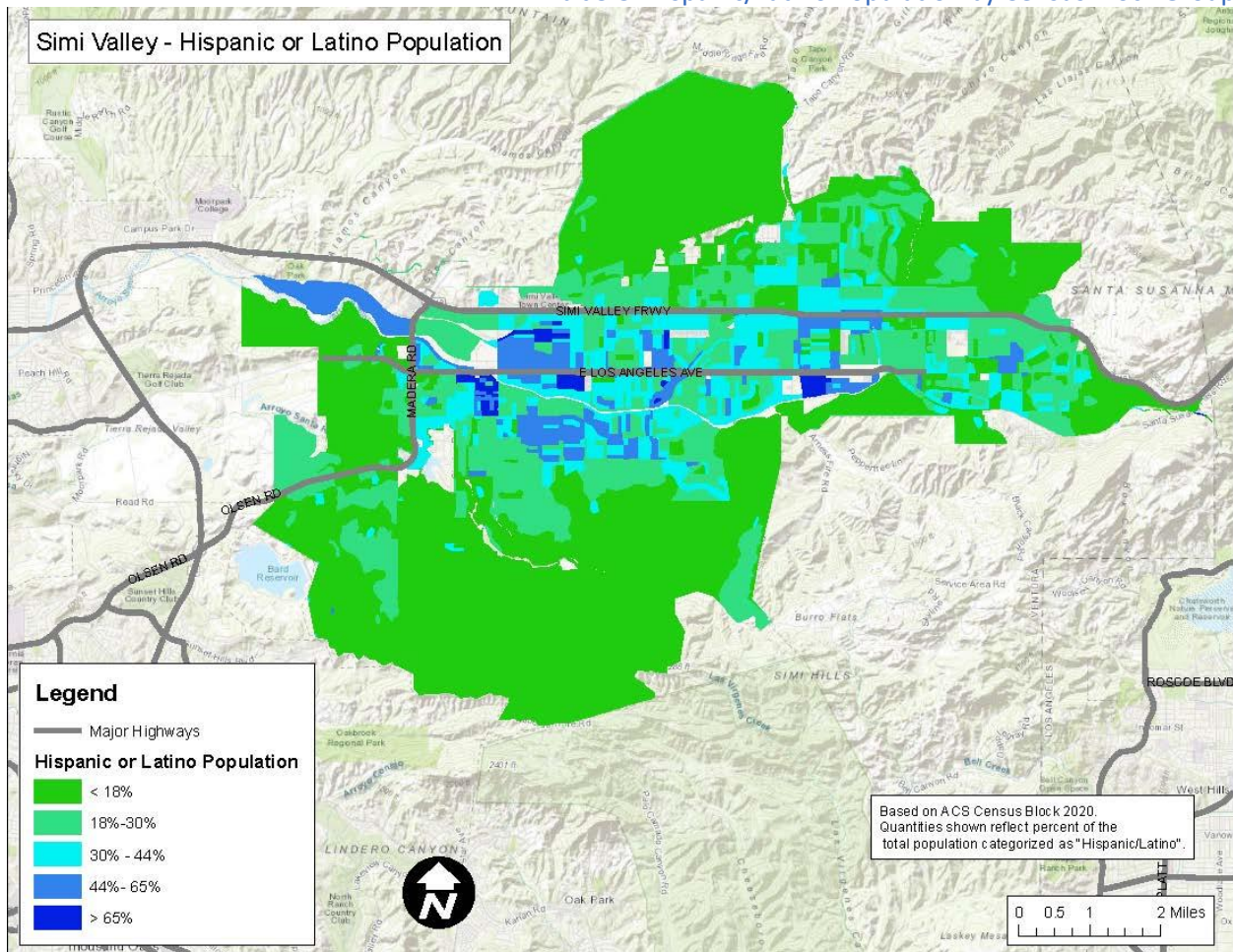
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Ethnicity

The Hispanic/Latino population of Simi Valley is significantly larger than any single racial group except for White. More than 24 percent of residents identify as Hispanic/Latino. The Hispanic/Latino population is primarily concentrated in the center of Simi Valley, particularly in the western and southern portions of the city's central area. Service on Routes 10, 20, and 30 is provided in these areas.

Exhibit 5.5 Hispanic/Latino Population by Census Block Group



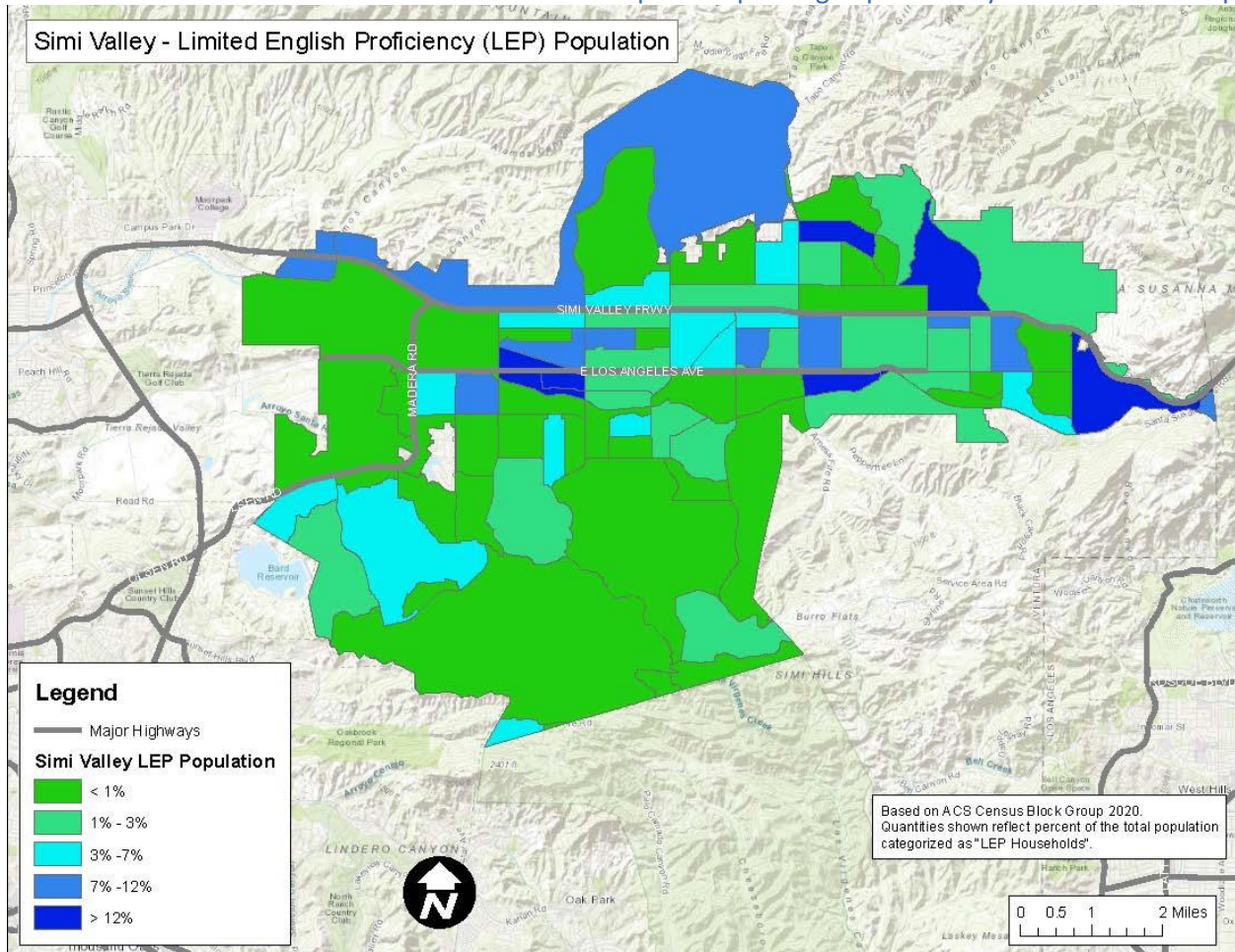
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LEP Populations

Not surprisingly, LEP populations are concentrated in many of the same areas shown in Exhibit 5.5. However, the census block groups with the highest LEP populations tend to be located on the edges of the city's central area. Some block groups with the highest LEP population are lower density areas, wherein LEP individuals may make up a higher percentage because the overall population is lower.

Exhibit 5.6 LEP Spanish-Speaking Population by Census Block Group



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English Learner Data

In order to better identify the LEP populations within the SVT service area, and to begin monitoring/tracking changes in those groups, the City reviewed English Learner statistics for students within Simi Valley. Public schools within the California Department of Education (CDE) must identify and quantify those students who are English Learners – students whose native tongue is a language other than English – as well as which language is their mother tongue. This data is available online via CDE’s DataQuest website, dq.cde.ca.gov/dataquest/.

The City accessed the available English Learner data for the 2021-2022 school year to complete its demographic assessment of the communities it provides service to, including what LEP populations exist and where these groups may be concentrated. Periodic review of this data will enable the City to monitor which non-English languages (other than Spanish) are growing in order to provide appropriate language assistance services.

The Simi Valley Unified School District (SVUSD) had 15,711 students enrolled during the 2021-2022 school year. Of those, 1,863 students (11.9 percent) were considered English Learners.

Consistent with data from the 2020 American Community Survey, the vast majority of English Learner students in the Simi Valley Unified School District speak Spanish (85.67 percent). The next largest non-English-speaking group cited is Vietnamese (1.99 percent of English Learners). Consistent with the findings of the American Community Survey, it is unlikely that any additional languages will trigger the Safe Harbor Provision prior to the next required updating of its Title VI Plan. Detailed counts and relative percentages for the Simi Valley Unified School District are presented in Exhibit 5.7.

Three schools were identified as having the highest percentage of English Learners: Berylwood Elementary (60.5 percent), Apollo High School (57.1 percent), and Park View Elementary (44.0 percent). For each of these schools, Spanish-speakers represented at least 95 percent of the English Learners in each school. Each of these schools is located in a census block group that has 18 percent or higher Hispanic/Latino population (as shown in Exhibit 5.5). Vista Elementary had the highest concentration of Vietnamese-speaking students with a total of six (representing 9.0 percent of English Learners at that campus). Mountain View Elementary had the highest concentration of Persian/Farsi-speaking students with a total of six (representing 12.5 percent of English Learners). Katherine Elementary had four Punjabi-speaking students, representing 9.5 percent of English Learners. Garden Grove Elementary and Santa Susana High School each had three Filipino/Tagalog-speaking students (representing 5.9 percent and 8.8 percent of English Learners, respectively).

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

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Spanish, which has the greatest number of English learners, had a net increase of approximately five percent over the past six years but a net decline of one percent over the last three years. Vietnamese experienced a net 30 percent increase over the past three years, but a net 29 percent decline since 2016-2017. Punjabi has seen the steadiest growth, increasing 50 percent in six years and 14 percent in the last three years. Persian (Farsi) had a net eight percent increase over the last six years but a net 7 percent decrease in the last three years.

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Exhibit 5.7 School English Learner (EL) Population

Language	K	1	2	3	4	5	6	7	8	9	10	11	12	Total	Percent
Spanish	165	129	150	135	166	148	155	144	84	83	89	64	84	1,596	85.67%
Vietnamese	6	5	2	8	5	4	1	3	1	0	1	0	1	37	1.99%
Farsi (Persian)	3	2	1	3	5	1	2	2	1	1	2	1	1	25	1.34%
Filipino (Pilipino or Tagalog)	0	2	3	0	2	3	4	3	0	1	1	1	1	21	1.13%
Telugu	2	1	1	3	1	0	0	0	0	0	0	0	0	8	0.43%
Other non-English	6	3	3	2	2	3	1	2	0	2	2	4	0	30	1.61%
Arabic	6	0	4	1	1	1	0	1	0	1	0	0	0	15	0.81%
Punjabi	4	2	4	3	5	1	1	1	0	0	1	1	1	24	1.29%
Tamil	0	2	1	2	2	1	0	0	0	0	1	0	0	9	0.48%
Pashto	1	0	1	0	2	0	1	0	0	0	2	0	0	7	0.38%
Korean	1	1	1	2	0	3	1	0	0	1	0	0	0	10	0.00%
Russian	0	1	1	2	2	0	0	0	0	0	3	0	1	10	0.54%
Hindi	3	0	0	1	0	2	1	1	0	0	0	0	0	8	0.43%
Gujarati	0	3	0	1	1	0	0	1	1	1	0	0	0	8	0.43%
Thai	0	1	1	1	1	0	0	0	0	1	0	0	1	6	0.32%
Mandarin (Putonghua)	1	0	1	0	0	1	1	1	0	0	0	0	1	6	0.32%
Urdu	0	0	1	0	0	0	0	1	0	0	1	0	0	3	0.16%
Hungarian	1	0	0	1	1	0	0	1	0	0	0	0	0	4	0.21%
Cantonese	1	0	2	1	0	1	0	0	1	0	0	0	0	6	0.32%
Armenian	0	0	1	2	0	0	0	2	0	1	0	0	0	6	0.32%
Bengali	0	0	0	1	0	0	1	0	0	0	0	0	0	2	0.11%
Kannada	0	0	1	0	0	0	0	0	0	0	0	0	1	2	0.11%
Marathi	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0.05%
Khmer (Cambodian)	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0.05%
Hebrew	0	0	0	0	1	0	0	1	0	0	0	0	0	2	0.11%
Indonesian	1	0	1	0	1	0	1	0	0	0	0	0	0	4	0.21%
Italian	0	0	0	1	0	0	1	0	0	0	0	0	0	2	0.11%
Japanese	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0.05%
French	0	1	0	0	1	0	1	0	0	0	0	1	0	4	0.21%
Polish	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0.05%
Turkish	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0.05%
Portuguese	0	0	0	0	0	0	0	0	1	1	0	0	0	2	0.11%
Assyrian	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0.05%
Total	203	153	182	169	199	170	172	164	90	93	103	72	93	1,863	100.00%

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Section 6 | Public Participation Plan

The City of Simi Valley's Mission Statement illustrates the City's commitment to community involvement and accessible government:

To deliver excellent service to our community by providing a safe and healthy living environment, sound fiscal management, responsive customer service, and an atmosphere that encourages community involvement and volunteerism through a local government that is accessible, efficient, and accountable to its citizens.

The City utilizes a variety of public participation models, including traditional and non-traditional public outreach formats. The following pages detail the mechanisms in place for the City to engage the public in the decision-making process, as well as the public outreach efforts undertaken since the last submission of the Title VI Plan to the Federal Transit Administration for review.

Summary of Ongoing Public Outreach

Traditional Public Outreach

1. **City Council:** The City of Simi Valley utilizes public meetings of the City Council to adopt annual Transit budgets, Program of Projects, transportation planning policies, service reductions, and fare increases as required by applicable Federal, State and local laws.
2. **Transit-Focused Advisory Boards:** The City Council appoints two members to the Ventura County Transportation Commission's (VCTC's) Citizen's Transportation Advisory Committee (CTAC). The CTAC serves as an advisory panel to VCTC. The Committee includes two non-elected members from each city and Ventura County, two at-large members, and one representative each from Camarillo Health Care District, Commission on Human Concerns, Developmental Disability, St. John's Medical Center, Public Social Services Agency, and VCTC (as the Consolidated Transportation Services Agency/CTSA). The City also has an Americans with Disabilities Act Paratransit Advisory Committee, which ensures public input into the City related to the delivery of paratransit services to the disabled.

Section 9 depicts the racial membership of the aforementioned non-elected boards and commissions as self-identified by the membership.

3. **Population-Targeted Advisory Boards:** The City also has seven other advisory boards that provide community input opportunities from targeted populations that have an interest in transit services. While these boards are not focused on transit specifically, and therefore are not subject to the Title VI requirement for reporting racial diversity, they each represent sectors of the community that may use and/or are dependent on the transit services provided by the City. These boards allow for regular and consistent opportunities for community input into the City's decision-making process.

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- The Council on Aging's (COA's) mission is to identify the needs of senior citizens and to serve as an advocate to support programs and services providing seniors with maximum independence, safety, and quality of life.
- The Youth Council focuses on issues affecting youth in the community.
- The Youth Employment Service Advisory Board is made up of representatives of government agencies, schools, employers, and community members at large to discuss employment issues that relate to youth.
- The four Neighborhood Councils are comprised of residents from defined geographic regions within the City. The Neighborhood Councils provide a public input opportunity to allow changes in policy recommendations to be made prior to an official public hearing, afford policy makers and City staff the opportunity to gain a more thorough understanding of citizen concerns and needs, and provide residents the opportunity to voice their concerns in a less formal atmosphere than a public hearing.

Going forward, transit staff members will attend monthly COA meetings to maintain strong lines of communication with senior and ADA ridership and allow for continuous feedback to strengthen the quality of services provided. The remaining City population-targeted advisory bodies have the ability to provide input on transit during public statements and have transit-related agenda items when appropriate.

Non-Traditional Public Outreach

1. **Website and E-Notifications:** The City uses its website and e-notification system to publicize transit services, public meetings, community events, and opportunities for the public to share ideas and concerns. The e-notification system allows for targeted distribution of materials to community members interested in various subject areas. The targeted distribution allows staff to tailor messages for maximum effectiveness.
2. **Social Media:** The City utilizes its social media platforms to provide updates to the community about Transit-related items. In addition, social media platforms include a translation feature, which enables information to be translated into the reader's selected language.
3. **Simi Valley Television:** The City's public, education, and government (PEG) channel provides access to City Council and Planning Commission meetings through basic tier cable service and through streaming video on the City's website. It also provides for outreach opportunities through the community bulletin board which runs on the cable channel and provides a static listing of active postings on the City's website. The community bulletin board allows for multiple message impressions and the ability to redirect viewers to services and resources.
4. **Newsletters:** The *City Focus Newsletter* is a monthly e-newsletter distributed to residents who opt-in via the E-Notify system. Its purpose is to keep residents informed about City programs and services, including Transit. The City's senior newsletter, *Senior News*, provides a direct mailing and emailing opportunity for seniors within the City. The monthly newsletter has the opportunity for transit information and resources in every issue.

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5. Community Events and Partnerships: The City participates in a variety of community events focused on increasing awareness of, participation in, and access to City programs and services. Through participation in these events, the City has enhanced its community partnerships with community organizations that focus on underserved populations.
6. Print Media: The Simi Valley *Acorn* newspaper is a weekly newspaper focused on the Simi Valley community. Available in both print and electronic editions, the *Acorn* also maintains a website, social media, and podcasts. The *Acorn* offers an important outreach and awareness tool for the City's Transit program, whether through purchased advertising or earned media.

Summary of Completed Public Outreach

Access to Transit Information for LEP individuals

- Bilingual/Spanish staff is available to answer telephone inquiries for SVT fixed-route information and/or Americans with Disabilities/Dial-A-Ride information.
- The Simi Valley Transit webpage features a "Select Language" widget that translates online text into the specified language. (However, it does not translate linked .pdf files into another language.)
- The following service information materials are currently available in both English and Spanish: (1) fixed-route bus schedule information; (2) transit-related bulk-head information; (3) comment cards; (4) rider surveys; (5) Senior and Disabled Riders Guide; and (6) Dial-A-Ride Application.
- The following materials are in the process of being translated into Spanish: (1) Fixed-route Reduced Fare ID Application; (2) Senior and Disabled Transportation Service Brochure; (3) Title VI Complaint Procedures; and (4) Title VI Complaint Form.

Community Event Participation (2019-2022)

Simi Valley Transit traditionally participates in multiple community events, which reached between 350 and 500 community members each year pre-pandemic. Since March 2020, there have been fewer opportunities for community event participation as events have been canceled or moved to a virtual format. Between 2019 and 2022, SVT participated in annual events including the Senior Health and Wellness Fair and Living Green Expo. SVT intends to return to broader participation in community events as more of them resume in the coming years.

Between 2019 and 2022, SVT also participated in ADA Paratransit Advisory Committee meetings, Council on Aging meetings, VCTC's Unmet Transit Needs process, and VCTC's Transit Operators Advisory Committee (TRANSCOM) meetings, all of which are open to the public.

Boards and Commission Meetings

- The ADA Paratransit Advisory Committee meets quarterly in January, April, July and October.
- The Citizen's Transportation Advisory Committee (CTAC) quarterly in January, April, July and October.
- The Council on Aging (COA) meets monthly and participates in the Unmet Transit Needs process annually.

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- The four Neighborhood Councils participate annually in the Unmet Transit Needs process.

Service and Fare Changes

In February 2019, the City completed a Short Range Transit Plan (SRTP) which included service changes, an increase to the ADA fare, and changes to bus pass fares. These proposed changes were presented during three public meetings/workshops in December 2018, as well as to the Neighborhood Councils, the ADA Paratransit Committee, and the Simi Valley City Council (February 2019). The City conducted separate fare and service equity analyses to assess the impact of the fare changes and any major service changes arising from these changes, since no equity analysis was included in the SRTP.

The service equity analysis was completed in December 2019. Using the City's Remix platform, it analyzed the change from the existing four-route system (Routes A, B, C, and D) to the proposed four-route system (Routes 10, 20, 30, and 40) by looking at the impact on both low-income and minority populations. The threshold for both disparate impact and disproportionate burden was ± 10 percent. The service equity analysis found the impact of the change on the minority population was 3.3 percent greater than the area average, which is less than the ± 10 percent threshold. It also found the impact on the low-income population was 2.6 percent greater than the area average, which is also less than the ± 10 percent threshold. The analysis concluded the proposed major service change did not constitute a disparate impact or disparate burden.

The fare equity analysis was completed in March 2020. It examined how two potential fare increases (25 cents and 50 cents) to the base one-way fare would impact minority and low-income populations. These changes would be applied to other fare media for an "across-the-board" fare increase. Data regarding fare media usage from the 2019 Rider Survey was used as the basis for the analysis. The threshold for both disparate impact and disproportionate burden was ± 10 percent. The fare equity analysis found that each proposed increase had the same effect with respect to its impact on low-income and minority populations. The impact of the change on the minority population was never more than 2.6 percent greater than the area average, which is less than the ± 10 percent threshold. It also found the impact on the low-income population was never more than 2.6 percent greater than the area average, which is also less than the ± 10 percent threshold. The analysis concluded the proposed fare change did not constitute a disparate impact or disparate burden.

Outreach Requirements and Activities

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

Baseline Tier – Minimum Outreach

"Baseline tier" activities include routine service, route, schedule, and system enhancements and revisions. This tier also includes short-term projects (less than one year in duration) where potential impacts to Simi Valley Transit and its customers should be considered during planning phases. Examples include minor revisions to fixed-route schedules and minor route alignments or stop closures due to construction and/or events. This also includes updates to service branding and fare media and collateral.

- Notice for public events may include car cards, posters, email blasts, media releases to papers, and/or radio announcements as funding allows.

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- Any notice for a public event will be posted at least one week prior to said event.
- Notices may be posted at the City's transit offices, at City Hall, onboard service vehicles, at bus stops/shelters as deemed appropriate, and at key community locations with which the City has a relationship.
- Whenever possible, information regarding public participation opportunities will also be posted on the City's website at least two weeks prior to a public event.
- Comments will be accepted via public outreach events and by email, mail, and phone to ensure that all populations have the opportunity to participate.

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Moderate Tier – Minimum Outreach

“Moderate tier” activities include projects involving a year or longer of development and/or implementation where impacts to existing and future riders must be considered. Examples include development and implementation of new/expanded services, development of Short Range Transit Plan, Bus Stop Infrastructure Plan, Marketing Plans, Transit Master Plan, and facility/storage construction projects, etc. Any project within this tier to be conducted by a third-party (i.e., consultant or contractor) will include public participation requirements and criteria as part of the RFP process.

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

Extensive Tier – Minimum Outreach

“Extensive tier” activities include projects involving multiple years of development and/or implementation where impacts to existing and future riders must be considered. Examples include Comprehensive Operational Analyses, development and construction of transit center/facilities, transit system redesign (complete overhaul of existing system and operations), transition of administration of services, etc. Any project within this tier to be conducted by a third-party (i.e., consultant or contractor) will include public participation requirements and criteria as part of the RFP process.

- All applicable Moderate Tier elements are included within Extensive Tier projects.
- The City shall conduct expanded outreach to community stakeholders and business owners.
- The City shall investigate the establishment of a transit-oriented committee to guide the development and implementation of the project and public participation.
- The City shall expand regional entity participation, including but not limited to the Ventura County Transportation Commission (VCTC), East County Transit Alliance (ECTA), Metrolink, Amtrak, Gold Coast Transit District, Moorpark Transit, Thousand Oaks Transit, and County of Ventura, by seeking comments and participation in project meetings and planning activities.

Currently, the LEP Spanish-speaking population is the only quantifiable population within Simi Valley Transit’s service area that reflects limited English proficiency under the Safe Harbor Provision. The City will continue assessing the language needs of individuals in its service area through its Language Assistance Plan. Should another population with limited English proficiency reach or surpass population levels as defined by the FTA Title VI Circular 4702.1B (currently five percent of the total service area

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population or 1,000 persons, whichever is less), the City will reassess this element of its Title VI program and the strategies presented below.

Outreach Methods for Engaging Minority and Limited English Proficient Populations

Baseline Tier – Minimum Minority Outreach

- Notices will be bilingual or Spanish-language notices will be developed and posted alongside English notices.
- Spanish-language notices will be posted on all revenue vehicles and at bus shelters that have been identified as key destinations of Limited English Populations (LEP), if such information exists.
- Event information on the Simi Valley Transit website will be posted in English and Spanish (or be able to be translated through use of the Google Translate widget).
- The City will distribute event information to community groups and agencies that work with LEP populations, including faith communities.
- As identified in its Language Assistance Plan, the City intends to contract with an interpretation service to provide language assistance for customers and callers that are non-English-speaking.
- Spanish interpretation or translation at any public meetings or workshop will be provided by City staff as warranted, or a professional translator/interpreter if no qualified staff member is available.

Moderate Tier – Minimum Minority Outreach

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

Extensive Tier – Minimum Minority Outreach

- All applicable Moderate Tier elements are included within Extensive Tier projects.
- Translated notices will be sent to Spanish-language magazines, newspapers, and/or radio stations as they are identified.
- The City will ensure that professional non-English-language interpretation will be available at any public meeting or workshop associated with an Extensive Tier project as deemed appropriate and necessary.

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Section 7 | Four-Factor Analysis

The U. S. Department of Transportation (USDOT) requires public transit funding recipients to take reasonable steps to ensure meaningful access to programs by limited English proficient (LEP) persons. As a recipient of federal funds, the City of Simi Valley must perform a Four-Factor Analysis to assess language needs and determine what steps it will take to ensure LEP persons can effectively access and utilize Simi Valley Transit services.

Estimating the number or proportion of LEP individuals that may be encountered by Simi Valley Transit will help further identify the populations covered by the USDOT's Safe Harbor Provision. This provision stipulates that if an LEP group speaking a given 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, the service provider may be required to make the following materials and services available to speakers of that language:

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

The size of the population alone does not automatically trigger the Safe Harbor Provision. All four factors must be considered in determining whether a specific language should be included in an operator's Language Access Plan. The four factors analyzed are discussed below.

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

Factor 1 looks at the total number of persons with limited English proficiency eligible to be served by Simi Valley Transit. Given the City's transit program is open to the general public, this factor looks at the total population of the transit service area, which is defined as the city of Simi Valley.

Simi Valley's total population is 125,768, with 118,885 individuals being age five years and over. Of that number, a total of 10,587 persons (8.9 percent) are identified as having Limited English Proficiency. Of these persons 6,211 (5.2 percent) speak Spanish; 587 (0.5 percent) speak Vietnamese; 713 speak Chinese (0.6 percent), 372 speak Tagalog (0.3 percent), 763 speak other Asian and Pacific Islander languages (0.6 percent), and 1,179 speak other Indo-European languages (1.0 percent). (These last two groups include multiple languages, and as a result are not considered under the Safe Harbor guidelines.)

Factor 1 Finding

While Simi Valley Transit serves a diverse population, historically, Spanish has been the primary non-English language in which customer interactions take place. Given the concentration of Spanish-speaking individuals who speak English less than "very well" (5.2 percent of the population), this continues to be the case. The Safe Harbor Provision calls for translation of written material for each LEP language group that constitutes five percent of the population or 1,000 individuals, whichever is less. Spanish qualifies as

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a Safe Harbor language with respect to both thresholds, and the City already treats it as such with respect to transit vital information given the high usage of the program by Spanish-speaking individuals.

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

Factor 2 hones in on the frequency with which LEP individuals come into contact with the City's transit services. This assessment relies on input from two sources: the riders themselves and transit program employees.

Customer Survey (2019)

In order to gain feedback from the riders, the City conducted a short rider survey from July 25-31, 2019. The survey was made available in English and Spanish, and was available on the transit vehicles as well as online. The purpose of the survey was to determine what LEP individuals were riding Simi Valley Transit, as well as what fare media they used and whether they or others they knew faced any barriers to using transit due to language.

This effort resulted in the collection of 328 responses. Nearly 82 percent of respondents chose to take the survey in English, with the remainder taking the survey in Spanish. Surveys were collected onboard all routes during all day-parts.

The majority of respondents (74.1 percent) used cash to pay their fare, with another 14.9 percent using a multi-ride pass. Few said they used the unlimited day pass (1.8 percent) or monthly pass (6.1 percent). "Other" responses included riding on a student ID, transferring from VCTC or Metrolink, or using an ACCESS ID. Nearly one-third (31.2 percent) said they paid a reduced fare. Most of those who said they did not speak English at all used cash, though three individuals did indicate using the unlimited monthly pass. Most of those who said they spoke English less than "very well" also tended to use cash. Those who said they speak English at home were most likely to use non-cash fare media.

As expected, English is the language most frequently spoken at home (77.7 percent). However, 36.3 percent said they speak Spanish at home. Tagalog (4.3 percent) and Chinese (1.5 percent) were the only other languages that represented more than one percent of the surveyed riders. Languages spoken by 0.9 percent included Persian/Farsi, Hindi, and American Sign Language (ASL). Languages spoken by 0.6 percent included French, Punjabi, and Vietnamese. Languages spoken by 0.3 percent (one individual) included Arabic, Italian, Japanese, Portuguese, Tamil, and Thai.

More than 72 percent of respondents indicated speaking English "very well." Just over 21 percent said they spoke English less than "very well," while nearly seven percent said they did not speak English at all.

Spanish was the most frequently cited language spoken at home among those who speak English less than "very well" (46 responses). Interestingly, 33 respondents indicated speaking English less than "very well" despite living in a household where English is spoken. Other languages spoken in the homes of those indicating they speak English less than "very well" included Tagalog (six responses), Chinese (three responses), and Persian (one response). Among those who said they did not speak English at all, the majority indicated living in Spanish-speaking households.

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Nearly 70 percent of riders indicated being a minority race or ethnicity. Hispanic/Latino was the most common response (45.7 percent), followed by Asian (13.4 percent), African American/Black (7.0 percent), and Native Hawaiian/Pacific Islander and Native American/Alaska Native (1.8 percent each).

Among the 68 respondents who said they spoke English less than “very well” and also identified their race/ethnicity, 73.5 percent identified as Hispanic/Latino, 19.1 percent identified as Asian, and 7.4 percent identified as White. Nearly all respondents who said they did not speak English at all identified as Hispanic/Latino.

Fewer than five percent indicated they or someone they knew had difficulty using Simi Valley Transit due to a language barrier. When asked to describe the situation further, several respondents described a situation specific to a language barrier but only one referenced a specific language (Spanish).

From this information, we find LEP individuals do utilize Simi Valley Transit. While the majority of them speak Spanish, there are some LEP individuals who speak Tagalog, Chinese, or Persian.

Staff Survey (2022)

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

Among the 20 staff surveyed, 40 percent (eight individuals) speak Spanish, 15 percent (three individuals) speak Tagalog, and one individual speaks French.

Exhibit 7.1 Language spoken by staff role

Language Spoken	Driver	Customer Service/ Dispatcher	Supervisor/ Manager	Other
Tagalog	1	1	1	
Spanish	4	1	3	
Other (French)	1			

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

Staff indicated that Spanish-speaking customers are the most frequently encountered, indicated by 80 percent of respondents. One respondent each (five percent) cited encountering customers speaking Persian, Tagalog, and Vietnamese.

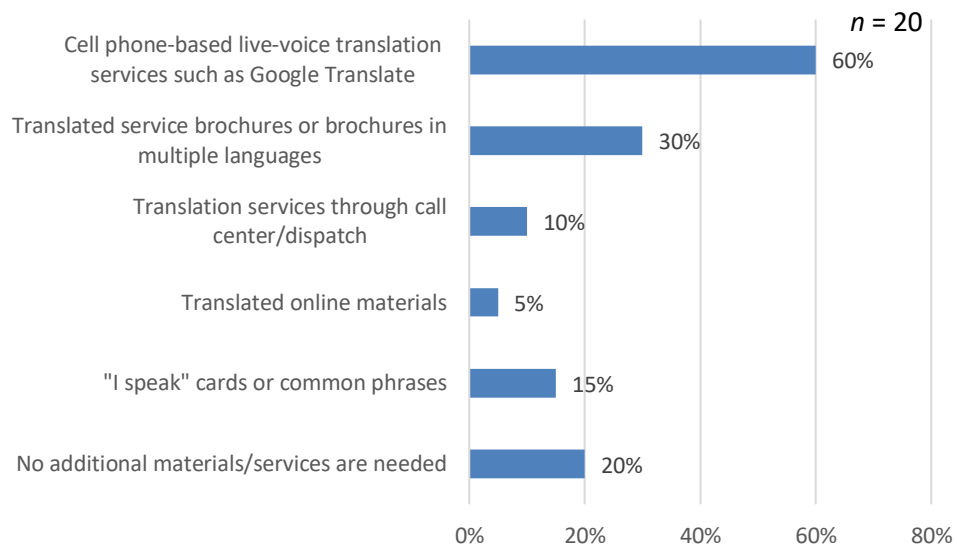
Nearly two-thirds of respondents (60 percent) indicated having occasional communication issues with Simi Valley Transit customers who do not speak English or do not speak English well. An additional 35 percent said they have no issues. Respondents who said they spoke Spanish were most likely to have no communication issues (six responses). Respondents who speak only English were most likely to have occasional issues (eight responses), though Spanish-speaking and Tagalog-speaking employees also cited having occasional issues (two and three responses, respectively).

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While 20 percent said they did not need additional materials to assist with communication with LEP individuals, others indicated such materials would be beneficial. Cell phone-based live translation services (60 percent) and translated service brochures in multiple languages (30 percent) were top responses, as was “I speak” cards or common phrase cards.

Exhibit 7.2 Beneficial materials to assist with LEP communication



When asked to describe the most common topics during which communication barriers arise, 65 percent of respondents indicated information about routes and destinations. This was followed by where to get off or when destinations are reached (20 percent), fares and how to pay (15 percent), and how to use the service (10 percent). Only three respondents said they had not experienced any language or communication barriers.

Of the 11 drivers surveyed, the number of unique LEP customers encountered during a typical week varied. Approximately nine percent indicated encountering fewer than five customers, while 45.4 percent encountered five to ten. Respondents indicating less than five only encountered Spanish-speaking customers. Those indicating five to ten said they encountered primarily Spanish-speaking customers but also some who spoke Tagalog and Persian.

Customer service representatives and dispatchers were more diverse, with more than half of the eight respondents indicating less than five and the other half indicating more than 10. Respondents indicating less than five encountered Vietnamese-speaking customers in addition to Spanish-speaking customers. The singular dispatcher indicating more than 10 said they encountered customers speaking Spanish only.

The survey also asked respondents regarding how Simi Valley Transit could serve the community more effectively. Responses related to Title VI included the following:

- Translated brochures would be helpful.
- Equity training program for staff to engage with our riding population.

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Factor 2 Finding

The 2019 customer survey and 2022 staff survey both confirmed that Spanish-speakers are the most likely LEP persons to come into contact with Simi Valley Transit. However, there is usage by LEP persons who speak other languages, including Tagalog, Persian, and Vietnamese. Given the frequency of usage by Spanish-speaking LEP individuals, it is essential the City continue to provide vital documents and service information in Spanish, to ensure compliance with the Safe Harbor Provision as well as to meet the needs of Spanish-speaking LEP customers.

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

Factor 3 assesses the important of transit services within LEP populations located within the service area. In this factor, we look at the reasons why LEP individuals use transit, and the potential effects of their inability to access transit because of language barriers.

Customer Survey (2017)

A customer survey conducted in 2017 (as part of the City's Short Range Transit Plan development) showed that, in general, few customers could be considered "choice riders." More than 46 percent of respondents did not have a driver's license or access to a vehicle, and another 44 percent had one but not the other. With respect to trip purpose, 66 percent said they were using Simi Valley Transit to travel to work, school, or medical services. Another 12 percent said they used the bus to access social services or go shopping. Only 20 percent gave a response of recreation or other (it is likely that some of those who selected other were using the bus to access essential services). This further reinforces the importance of the City's transit services among all customers, not just minority or LEP customers. That survey showed 61 percent of respondents identified as minority riders. Given the high percentage of minority riders, it is likely the survey results as a whole are also indicative of minority and LEP riders.

The Spanish-speaking LEP population within the Simi Valley Transit service area is more likely to be transit-dependent than other populations. This is through a combination of factors including language barriers, income, and lack of transportation choices. Therefore, SVT service is deemed to be of significant importance to the Spanish-speaking LEP population with respect to mobility and accessibility. It remains crucial that the City maintain its rigorous standards for accessibility of not only the services offered, but the related service information and notices regarding changes to same. Overall, feedback from City and SVT staff and the general public indicate that while there may be multiple non-English speaking populations throughout the service area, Spanish speakers are most likely to depend on SVT and face language-related barriers to using the City's public transit services. In terms of outreach, it is important the City continue its efforts to address language-related barriers faced by the local LEP populations, such as ensuring key written materials such as rider information are translated into Spanish, and that bilingual staff members are available as needed.

Stakeholder Survey (2022)

In order to gain additional information about the importance of Simi Valley Transit services to LEP communities, we reached out to 14 local organizations with a stakeholder survey. Stakeholders marked with an asterisk (*) returned a completed survey.

- The ARC of Ventura County*
- Boys and Girls Club of Simi Valley

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- County of Ventura Area Agency on Aging*
- The Foothills at Simi Valley
- Justin Early Learners Academy
- Leadership Simi Valley
- The Lighthouse Bible Church
- Millennium Care Adult Day Health Care Center*
- Rancho Simi Recreation and Park District
- The Samaritan Center*
- Simi Valley Chamber of Commerce*
- Simi Valley Council on Aging
- Simi Valley Senior Center*
- Simi Valley Unified School District

Of the six organizations, five provide social services, one provides health services, one provides educational services, two represent government/business/industry, and one provides nutrition services.

Spanish is the most common language encountered by stakeholders, with 100 percent of organizations having Spanish-speaking clients or members. Tagalog is second most common, cited by 67 percent of organizations, followed by Persian and Vietnamese (33 percent each), and Chinese and American Sign Language (17 percent each)

Exhibit 7.3 Languages spoken by stakeholder clientele/members

Language	Frequency	Percentage
American Sign Language	1	17%
Chinese	1	17%
Persian	2	33%
Spanish	6	100%
Tagalog	4	67%
Vietnamese	2	33%

Stakeholders reported few language barriers, with only two organizations indicating language barriers occur occasionally. The majority of respondents said they occur rarely.

All respondents, with the exception of one, indicated their clients/members use Simi Valley Transit. Of those, most said fewer than 25 percent of those transit users are non-native English speakers. None of these organizations were aware of any barriers to using public transit caused by a language barrier.

Two-thirds of the stakeholders surveyed offer translation services, including in American Sign Language¹ (1), Chinese (1), Persian (1), Spanish (4), Tagalog (2), and Vietnamese (2). One organization offers telephone translation services through the City in multiple languages. This provides potential opportunity to partner with stakeholders when conducting outreach to LEP populations.

¹ It should be noted that American Sign Language (ASL) interpretation is covered under the Americans with Disabilities Act, rather than Title VI.

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Factor 3 Finding

Factor 3 confirmed again that Spanish is the most prevalent language in Simi Valley, and that the transit service is important to many Spanish-speaking customers. It also reinforced that there are persons speaking multiple languages in Simi Valley. While 83 percent of stakeholders said their clients or members use transit, they do not report any language barriers to using transit.

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

Factor 4 is different from the other factors, as it looks at the capacity and ability of the transit operator to conduct outreach to LEP populations. As noted in Factor 1, the Spanish-speaking LEP population is sufficiently large that the City must take measures to minimize language barriers faced by this group. As a result, the City offers access to Spanish-language versions of documents vital to the use of the transit system as well as access to Spanish-speaking employees or use of a third-party real-time translator for verbal information.

Of the additional languages identified through the four-factor analysis (i.e., Vietnamese, Tagalog, and Persian), none meet either criteria under the Safe Harbor Provision, even though some LEP members of these populations do utilize Simi Valley Transit. As such, the City is not required to provide vital documents in these languages. However, the City does have transit staff members who speak another language, including Spanish, Tagalog, and French.

Factor 4 Finding

It is the City's responsibility to ensure vital documents and essential service information (including verbal inquiries) in Spanish are provided. While there may be some cost involved, none of the recommended strategies exceed the City's likely resources. Providing information in other languages, while not required, should be undertaken as resources allow to facilitate use of the transit system by other LEP individuals. Existing or future staff members who speak languages encountered by customer-facing personnel should be called upon to provide interpretation whenever possible.

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Section 8 | Language Assistance Plan

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

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

The City of Simi Valley Title VI Program was prepared in August 2019 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

The City's Title VI Program Administrator is:

Ron Fuchiwaki, Public Works Director
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, CA 93063
(805) 583-6808
Email: rfuchiwaki@simivalley.org

Additional information regarding the Simi Valley Transit Title VI Program is available at:
<https://www.simivalley.org/departments/public-works/simi-valley-transit>.

Language Assistance Goals

One of the overarching goals of the City's Title VI Program is to provide meaningful access for LEP customers to Simi Valley Transit services, information, and materials through the creation of a Language Assistance Plan and by periodic evaluation of the associated outreach methods and strategies.

Language Service Provision

Bilingual Services

Whenever possible, the City will use bilingual employees to address the needs of LEP individuals. The City maintains a list of designated bilingual/Spanish employees for City Hall, the Public Services Center (PSC), and the Police Department. These employees can be called up to speak with customers in person or by phone in Spanish. In addition, Spanish-speaking transit employees will interact with Spanish-speaking LEP customers in their language as needed. Bilingual employees who speak other languages will provide support as available.

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Interpretation/Translation Services

When no Spanish-speaking employees are available, or if verbal communication is needed in a language other than Spanish, the City utilizes a third-party telephone interpretation service (TeleLanguage) to provide real-time interpretation. The City is currently in the process of getting transit employees trained in its use.

Drivers and other customer-facing personnel will be provided with a language guide to help identify languages used by LEP individuals. The guide offers a phrase such as “I speak [language]” or “point to the language you speak” in that language, with an identifier in English so the driver or other personnel can identify the language. This will enable use of telephonic interpretation as well as assist in the documentation of the LEP assistance provided for future updates to the Language Assistance Plan.

Exhibit 8.1 Sample Language Identification Guide



Real-time interpretation at public events will be determined on a case-by-case basis by examining several factors:

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- The type and size of the event,
- The availability of a City staff member to interpret, or
- The availability of a staff member of a host organization to interpret.

For small outreach events, such as Baseline Tier activities, proactive outreach, or smaller transit awareness events, bilingual staff members will assist with translation where appropriate and feasible, or professional interpreters may be retained if no staff member is available. For Moderate and High Tier public outreach events, where it is appropriate and necessary to do so, the City may arrange for a professional interpreter.

Before utilizing in-house staff for translation of vital documents or interpretation at public events, the City will develop a policy regarding evaluation of the competency of potential translators or interpreters. Not all individuals who speak a language have the ability to accurately translate vital documents or interpret technical language, so knowing which of the City's employees has these abilities and having a policy in place will assist in the City's decisions regarding the engagement of professional translators or interpreters.

Translation of Vital Documents

Based on the results of the Four Factor Analysis, the following vital documents and relevant information will be made available in Spanish, the only identified LEP language within the Simi Valley Transit service area.

Vital Documents

1. Title VI Program
 - Title VI Notice to the Public
 - Complaint form
 - Complaint procedures*
2. Service Information
 - Fixed-route service brochures
 - Dial-A-Ride handbook
 - Online service information (using a Google Translate widget)
 - Onboard notices related to service information
 - Comment card
 - ADA and senior transportation brochure
 - Dial-A-Ride application
 - Reduced fare application

Items marked with an asterisk are in the process of being translated into Spanish.

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Additional considerations

1. All translated vital documents will be posted on the Simi Valley Transit website.
2. Specific customer communications (such as letters) will be provided in both English and Spanish, or in another language if the letter is addressed to a specific individual who is known to have limited English proficiency.
3. The City will ensure all translations are done professionally prior to being made available to the public. If possible, all translated materials should be reviewed by a native speaker familiar with transportation-related terminology to ensure the translation accurately reflects idiomatic language as well as language conventions of the local population.

In the future, the City will translate and produce written documents on a case-by-case basis, after assessing all elements presented in the Four-Factor Analysis. If deemed a vital document under the Safe Harbor Provision, the relevant information will be translated into Spanish.

Strategies for Future Consideration

While the strategies listed above include all necessary actions for Title VI compliance, the City may wish to consider the following non-essential activities as time and resources allow. While low priority, they would enhance the City's ability to better serve its LEP populations that do not meet the Safe Harbor threshold.

- Actively recruit bilingual customer service and dispatch employees, particularly those who speak Spanish.
- Provide customer-facing personnel with the opportunity to learn basic Spanish, either through subsidizing enrollment in a language class or providing resources such as "Basic Spanish for Transit Employees."
- Create "evergreen" service information guides in Tagalog, Vietnamese, and Persian/Farsi. These guides would not include fare or specific service information (which would require more frequent updating) but could include rules of the road, pass information, regional connections, holidays, etc. They could be provided along with the English service brochure and/or refer to information on the website (which includes a translation feature).
- Prepare videos on how to ride the bus that can be maintained on the City's website. These can be created in English and either subtitled or voiced over in Spanish, Tagalog, Vietnamese, and Persian/Farsi to provide additional information to current and future LEP customers.

Monitoring, Evaluating, and Updating the LAP

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

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

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

The City will monitor its language assistance efforts, including:

- Recording and reporting on customer service interactions with LEP individual,
- Reviewing any applicable interpretation service reports,
- Incorporating discussion of Title VI into regular operations meetings, and
- Updating the Language Assistance Plan based on public feedback.

Should this monitoring of the City's language assistance efforts identify any challenges or deficiencies, the City will refine its existing customer service procedures to address specific Title VI issues.

Staff Training

During the orientation and training period, new hire dispatchers who do not speak Spanish are trained to report Spanish-language calls to the supervisor on duty. The supervisor then contacts a Spanish-speaking representative from the PSC Department to take the call, or the supervisor will take the call themselves if they are Spanish-speaking.

Once the City has implemented a third-party telephonic translation service, dispatch and customer service staff training will include instructions on how to use the service. If the service is used infrequently, "refresher" training will be conducted annually.

Given the increasing presence of other languages in the Simi Valley Transit service area, additional training will be conducted specific to Title VI across the next three years. This includes ensuring all staff have an understanding of Title VI and what types of protections it affords. This will help staff recognize Title VI-related requests as well as provide deeper understanding of what protections Title VI offers and what it does not cover.

Dispatchers and customer service representatives, as well as other staff as deemed necessary, will receive training in:

- How to respond to LEP callers,
- How to respond to correspondence from LEPs,
- How to respond to LEP customers in person,
- How to document LEP needs,
- How to identify a complaint as a civil rights/Title VI issue, and
- How to respond to civil rights complaints.

Drivers will also receive additional training regarding how to effectively interact with LEP customers onboard transit vehicles, as well as how to document encounters and requests for information. Drivers

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and other customer-facing personnel will receive training on the language guide cited above as part of their initial training, and “refresher” training will be provided annually.

Four-Factor Analysis Findings

Considering the significant population of persons speaking Spanish who speak English less than “very well,” combined with this population’s propensity to use transit in Simi Valley, the City should provide vital documents and service information in Spanish per the Safe Harbor Provision.

The following specific documents used by the City of Simi Valley should be available in English and Spanish, with the documents either posted to the website or directions on how to obtain the documents posted to the website:

- Title VI Notice to the Public
- Complaint form
- Complaint procedures
- Fixed-route service brochures
- Dial-A-Ride handbook
- Online service information (using a Google Translate widget)
- Onboard notices related to service information
- Comment card
- ADA and senior transportation brochure
- Dial-A-Ride application
- Reduced fare application.

Implementation Plan

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

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Exhibit 8.2 Implementation Plan

Goal	Task	Date
Assess LEP population in Simi Valley Transit service area	Demographic analysis	Completed FY 2022
	Staff survey	Completed FY 2022
	Stakeholder survey	Completed FY 2022
	Onboard (rider) survey	Completed FY 2020
	Title VI Four-Factor Analysis	Completed FY 2022
Develop Language Assistance Procedures	Refine existing customer service procedures to better address Title VI complaints and concerns	As needed
	Develop City policy regarding competency of Title VI translations and interpreters	FY 2023
Staff training	Identify Simi Valley Transit staff with likely contact with LEP individuals	Completed FY 2022
	Develop Title VI training program for Simi Valley Transit employees	FY 2023
	Train Simi Valley Transit staff regarding Title VI and LEP customer service procedures	FY 2023
	Develop Title VI refresher training schedule for employees	FY 2023
	Develop Language Guide	FY 2023
Notification to LEP persons of Title VI rights and materials	Inventory existing notification methods and/or locations	Completed FY 2020
	Post Title VI notices in English and Spanish in public locations	Completed FY 2020
	Ensure all vital documents are professionally translated into Spanish	FY 2023
	Ensure service information is professionally translated into Spanish and readily available	FY 2023
	Undertake targeted outreach to LEP populations	Ongoing
	Implement low-priority strategies to enhance access by non-Spanish-speaking LEP individuals.	As resources are available
Monitor and update Language Assistance Plan	Develop process for obtaining feedback on language assistance measures and monitor	FY 2020; ongoing
	Regularly review ACS and Census demographic data	FY 2022
	Receive and review feedback from interpretation providers	Ongoing
	Incorporate discussion of Title VI into regular meetings with operations contractor	Ongoing
	Update Language Assistance Plan based on feedback received	FY 2022

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Section 9 | Membership of Non-Elected Committees and Councils

City of Simi Valley has established or participates in two non-elected committees, the CTAC and the ADA Paratransit Committee, to provide public input into the City’s transit programs.

The Citizen’s Transit Advisory Committee (CTAC) serves as an advisory panel to the Ventura County Transportation Commission. The Committee includes two non-elected members from each city and Ventura County, two at-large members, and one representative each from Camarillo Health Care District, Commission on Human Concerns, Developmental Disability, St. John's Medical Center, Public Social Services Agency, and VCTC (as the Consolidated Transportation Services Agency/CTSA). The City is responsible for appointing two representatives and one alternate, for a total of three members. All members must be residents of Simi Valley.

The ADA Paratransit Advisory Committee consists of seven individuals who hold quarterly public meetings to review and discuss ADA Paratransit issues such as service policies, service availability, accessibility, safety, and training. Members must be residents of Simi Valley and meet at least one of the following criteria to serve on the committee:

- Have an ADA disability,
- Live in a household with someone with an ADA disability, or
- Are associated with an agency supporting the disabled.

A summary of the racial/ethnic identities of committee members is provided in Exhibit 9.1.

Exhibit 9.1 Non-Elected Committee Membership

	Advisory Board	CTAC	ADA Paratransit
	Total Count	3	7
American Indian	Count	0	0
	Percent	0%	0%
Asian	Count	0	0
	Percent	0%	0%
African American	Count	0	1
	Percent	0%	14%
Hispanic/Latino	Count	1	1
	Percent	33%	14%
Caucasian	Count	2	5
	Percent	67%	72%
Decline to State	Count	0	0
	Percent	0%	0%

The City uses its website, public postings, press releases, email, community bulletin board postings, and announcements at various meetings to recruit potential members for these committees. Spanish-language information is posted to attract minority applicants.

Section 10 | Subrecipient Monitoring

The City of Simi Valley has no subrecipients, and therefore does not have a developed monitoring program.

Section 11 | Title VI Equity Analysis

The City of Simi Valley has not constructed any new facilities since the submission of its last Title VI program, and therefore was not required to conduct an 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 Simi Valley 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 begins planning for the development and construction of a new transit facility, it will conduct an equity analysis prior to the selection of a construction site inclusive of the Title VI requirements below:

- a. The City 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 Simi Valley's next Title VI Program update.

Section 12 | City Council Adopting Resolution

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RESOLUTION NO. 2022-42

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SIMI VALLEY APPROVING THE CITY OF SIMI VALLEY'S TITLE VI PROGRAM

WHEREAS, the Secretary of Transportation is authorized to make grants for public transportation projects; and

WHEREAS, the City of Simi Valley/Simi Valley Transit is interested in making applications for available Federal funds to support local transit services; and

WHEREAS, the contract for financial assistance will impose certain obligations upon the applicant, including provisions for the local share of project costs; and

WHEREAS, it is required by the U.S. Department of Transportation in accordance with the provisions of Title VI of the Civil Rights Act of 1964, in connection with the filing of an application for assistance under 49 U.S.C. Chapter 53, the applicant gives an assurance that it will comply with Title VI of the Civil Rights Act of 1964 and the U.S. Department of Transportation requirements thereunder;

WHEREAS, the City's Title VI Program will expire on July 31, 2022; and

WHEREAS, the Federal Transit Administration requires an active Title VI Program.

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

SECTION 1. The City Council approves the City of Simi Valley's Title VI Program attached hereto as Exhibit 1, effective through July 31, 2025.

SECTION 2. The City Manager (for the purposes of this resolution, the term "City Manager" includes the Interim City Manager) is hereby authorized to execute and file with such applications an assurance or any other documents required by the U.S. Department of Transportation effectuating the purposes of Title VI of the Civil Rights Act of 1964.

SECTION 3. It is within the City's mission to deliver excellent service to the community that is accessible, efficient, and accountable to its citizens.

SECTION 4. The City Clerk shall certify to the adoption of this Resolution and shall cause a certified Resolution to be filed in the Office of the City Clerk.

TRAN2225.RES.JD

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RES. NO. 2022-42

PASSED and ADOPTED this 25th day of July 2022.

Attest:

DocuSigned by:
Lucy Blanco
2C09F39D06CF480
Lucy Blanco, City Clerk

DocuSigned by:
Keith L. Mashburn
311FA0200F9436
Keith L. Mashburn, Mayor of the City of
Simi Valley, California

Approved as to Form:

DocuSigned by:
David L. Caceres
D2E77704C4901
David L. Caceres, City Attorney

Approved as to Content:

DocuSigned by:
Brian Paul Gabler
B340F55B5158A
Brian Paul Gabler, City Manager

DocuSigned by:
Ronald K. Fuchiwaki
D2A3F5E4AD58A
Ronald K. Fuchiwaki
Public Works Director

TRAN2225.RES.JD

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RES. NO. 2022-42

CERTIFICATION

I, City Clerk of the City of Simi Valley, California, do hereby certify that the foregoing is a full, true, and correct copy of Resolution No. 2022-42 which was regularly introduced and adopted by the City Council of the City of Simi Valley, California, at a regular meeting thereof held on the 25th day of July 2022, by the following vote of the City Council:

AYES: Council Members Luevanos, Cavanaugh, Judge, Mayor Pro Tem Litster and Mayor Mashburn

NAYS: None

ABSENT: None

ABSTAINED: None

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of Simi Valley, California, dated July 28, 2022.

DocuSigned by:
Lucy Blanco
2-08E-40718C1F450

Lucy Blanco
City Clerk

City of Simi Valley Title VI Program Update

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Section 13 | Fixed-Route Transit Provider Title VI Requirements

Recipients of Federal transit funding which operate less than 50 fixed-route vehicles during peak revenue service and are not located in an Urbanized Area (UZA) with a population of 200,000 or more are required to provide additional information with respect to *service standards* and *service policy* to ensure Title VI compliance.

Effective Practices to Fulfill Service Standard Requirement

Service Standards are divided into four primary categories: Vehicle Load Standards, Vehicle Headway Standards, On-time Performance Standards, and Service Availability Standards. Simi Valley Transit ensures Title VI compliance by adhering to the following:

Vehicle Load Standards

The City calculates vehicle load as the total number of ambulatory passenger seats available on a revenue vehicle divided by number of passengers.

The average passenger load for Simi Valley Transit services during all operating periods (peak and off-peak) should not exceed the following load factors (by vehicle type).

Exhibit 13.1 Vehicle Load Standards

Vehicle Type	Average Passenger Capacities			Maximum Load Factor
	Seated	Standing	Total	
New Flyer 40' Bus	37	25	62	1.7
NABI 40' Bus	40	25	65	1.6
New Flyer 40'8" Bus	32	30	62	1.6
ARBOC (when used for fixed-route relief)	13	6	19	1.5

Vehicle Headway Standards

Vehicle headways are defined as the total amount of time between revenue vehicles on a fixed-route traveling in the same direction. As defined in the City's 2019 Short Range Transit Plan, the minimum standard is 30 minutes for local routes during peak periods and 60 minutes during off-peak periods and Saturdays. For the commute route between Chatsworth and Moorpark (Route 10), the minimum standard is 60 minutes. It should be noted that these standards were established prior to the COVID-19 pandemic, and service demand and delivery has been impacted by the pandemic. As such, only Route 30 is currently in compliance with vehicle headway standards.

Exhibit 13.2 Vehicle Headway Standards

Route	Type	Maximum Headway (in minutes)
10	Commute	105 weekday 129 Saturday
20	Local	68
30	Local	30 weekday 60 Saturday

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On-time Performance Standards

Simi Valley Transit fixed-route on-time performance is defined as follows:

- On-time: Departing a published time-point zero minutes before and fewer than seven minutes after the published departure time.
- Early: Departing a published time-point at any time prior to the published time.
- Late: Departing a published time-point seven or more minutes after than the scheduled time.

The City of Simi Valley's on-time performance objective is 75 percent or greater. The City continuously monitors on-time performance during operational hours.

Service Availability Standards

Local bus stops shall be approximately one-quarter to one-half mile apart along routes within the city limits and no more than three-quarters of a mile apart.

Effective Practices to Fulfill Service Policy Requirement

Service Policy requirements are divided into two primary areas, *Vehicle Assignment Policy* and *Transit Amenities Policy*. The City ensures Title VI compliance by adhering to the following policies.

Vehicle Assignment Policy

Vehicles are assigned to routes on a rotating basis. Bus assignments take into account the mechanical and operating condition of vehicles, which are matched to the operating characteristics of the routes.

Transit Amenities Policy

Installation of new transit amenities along bus routes is based on the number of boardings at stops along those routes.