

ATTACHMENT D
2025 – 2028 TITLE VI PROGRAM UPDATE



*KINGS COUNTY AREA
PUBLIC TRANSIT AGENCY*

TITLE VI PROGRAM UPDATE AUGUST 2025 – 2028



KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
610 W 7TH Street
Hanford CA 93230

Title VI Contact: Angie Dow, Executive Director
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1. INTRODUCTION

Kings County Area Public Transit Agency (KCAPTA) has prepared this Title VI Program (Program) update in compliance with Title 49 CFR Section 21.9(b) and the Federal Transit Administration's (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients", issued on October 1, 2012. This update will cover the period from June 1, 2025 to July 1, 2028.

This Program is being submitted to FTA in accordance with their September 16, 2022, concurrence letter (**Attachment A**) informing KCAPTA that its Program status for the triennial cycle August 1, 2022 – July 31, 2025, was "concur," and establishing June 1, 2025 as the due date for KCAPTA's next Title VI Program update. While KCAPTA received concurrence on its Program, the review assessment included two comments on elements that needed to be addressed in a future submittal. KCAPTA has addressed or clarified as instructed. KCAPTA's responses to these comments are addressed where appropriate within the Program.

The Program documents the steps KCAPTA has taken and will continue to take to ensure that its transit services are provided without discrimination against individuals on the basis of race, color, or national origin. In addition to Title VI protections, KCAPTA does not discriminate against any other class protected by federal or state law. A copy of Resolution 25-08 approving this 2025 Program update can be found in **Attachment B**.

Any questions regarding this Title VI Program update should be directed to:

Kings County Area Public Transit Agency
610 W 7th Street
Hanford, CA 93230

Title VI Contact: Angie Dow, Executive Director
angie.dow@co.kings.ca.us
(559) 852-2691

2. GENERAL REQUIREMENTS

This section addresses the general requirement outlined in Chapter III of FTA Circular 4702.1B Supporting documentation is identified within the document and as attachments to this report.

Title VI Notice to Public

KCAPTA is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. In accordance with 49 CFR 21.9(d) and guidance provided in FTA Circular 4702.1B Chapter III-4, KCAPTA's Title VI Notice of Rights (Notice) includes:

1. A statement that the agency operates its programs without regard to race, color, or national origin;
2. A description of the procedures the public should follow in order to request additional information of the recipient's Title VI obligations;
3. A description of the procedures members of the public shall follow in order to file a Title VI discrimination complaint.

KCAPTA's Notice of Rights (Notice) has been translated into the one safe harbor language identified in KCAPTA's Language Assistance Plan (LAP); Spanish. The Notice also includes KCAPTA's Notice of Language Assistance and contact information for assistance obtaining information regarding KCAPTA's Title VI obligations and the procedures for filing a Title VI discrimination complaint.

In KCAPTA's September 16, 2022 concurrence letter, the FTA Region IV Civil Rights Officer (CRO) noted that KCAPTA needed to list out all of the vital documents that are translated into Spanish. This has been provided in **Attachment C**.

KCAPTA revised its Notice of Rights to convey the required information more clearly. KCAPTA updated all Title VI Notices, in all locations, including on KCAPTA buses and on the website during FY 2022.

The revised Notice can be found on KCAPTA's website at <https://www.kartbus.org/title-vi-dbe/> a copy of KCAPTA revised Notice of Rights and list of posting locations is included in **Attachment D**.

Title VI Complaint Procedures & Forms

As part of KCAPTA's commitment to ensuring that no person is discriminated against on the basis of race, color, or national origin, and to ensure compliance with 49 CFR Section 21.9(b) and guidance provided in FTA Circular 4702.1B Chapter III-5, KCAPTA has developed a Title VI complaint process and complaint form for investigation and tracking all Title VI complaints.

KCAPTA investigates complaints that allege discrimination based on race, color, or national origin. Complaints must be filed in writing within 180 days from the date of the alleged discrimination, and all Title VI complaints are investigated according to KCAPTA Title VI complaint process.

KCAPTA's complaint form and process have been translated into our Safe Harbor language and can be viewed on KCAPTA website at <https://www.kartbus.org/title-vi-dbe/>. KCAPTA's Title VI complaint form and process is included in English and Spanish in **Attachment E**.

List of Investigations, Complaints, or Lawsuits

To ensure compliance with 49 CFR Section 21.9(b) and guidance provided in FTA Circular 4702.1B Chapter III- 5, KCAPTA maintains a list of all complaints, investigations, and lawsuits alleging discrimination by KCAPTA on the basis of race, color, or national origin. As required, the list includes the date of the complaint, investigation, or lawsuit; a summary of the complaint, investigation, or lawsuit and the action taken in response to the complaint, investigation, or lawsuit.

Since June 2022, the date of KCAPTA's previous Title VI Program Update, KCAPTA has not received any Title VI complaints. No lawsuits have been filed against KCAPTA. KCAPTA customers most often interact with coach operators; therefore, it is to be expected that most Title VI complaints allege discrimination by a coach operator. KCAPTA's Executive Director, Transit Manager, contract transportation services general manager and operation manager are also informed of complaints involving coach operators.

KCAPTA buses are equipped with video and audio recording devices. If a complaint is a valid Title VI concern, the Executive Director contacts the complainant and begins an investigation into the complaint. If a valid Title VI violation has occurred, the Executive Director forwards her findings to contract transportation services general manager, who then initiates appropriate disciplinary action in accordance with KCAPTA policy, Contractor's policy, and applicable Collective Bargaining Agreements (CBA).

If complaints are found to be invalid or when disciplinary action is not warranted, coach operators may be provided with guidance or updated training. Complaints that are incorrectly reported as Title VI complaints are re-routed to the appropriate employee for further investigation. Complaints naming KCAPTA employees other than coach operators would follow a similar process.

In all cases, whether a Title VI complaint is found to be substantiated or unsubstantiated, Executive Director closes the complaint with a letter, phone call, or email, depending on the complainant's request and available contact information. At all time, employee named in the discrimination complaint is provided an opportunity to have union or other representation present during all interviews and are afforded the right to appeal any decision according to applicable KCAPTA policy, Contractor's policy, employee handbook, manuals, and applicable CBAs.

KCAPTA's internal process for reviewing Title VI complaints is included in **Attachment E**. A list of Title VI Complaints, Investigations, and lawsuits can be found in **Attachment F**.

Public Participation Plan

In accordance with 49 CFR Section 21.9 (b), FTA Circular 4702.1B Chapter III-5, KCAPTA has established Public Participation Plan (PPP, Plan) to identify effective methods to communicate with and engage all of its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of limited English proficiency, minority or socioeconomic status, or disability. Additionally, KCAPTA's PPP reflects the principles of FTA Circular 4703.1 which guides public transit providers to integrate the principles of environmental justice into the transportation decision-making process.

A summary of public participation and outreach efforts since April 2022 are documented within the Public Participation Plan

Language Assistance Plan For Persons with Limited English Proficiency

KCAPTA upholds the goals of the Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166, and the Department of Transportation's Limited English Proficiency Guidelines by ensuring that all persons, regardless of race, color, or national origin, are afforded meaningful access to its transit services.

In accordance with guidance provided in FTA Circular 47002.1B Chapter III-6, KCAPTA has conducted a Four Factor Analysis to determine the level of language assistance that will be provided to LEP individuals within its service area.

KCAPTA used the following required four factors to determine its obligation to accommodate LEP populations;

- Factor 1:** The number or proportion of LEP persons eligible to be serviced or likely to be encountered by a program, activity, or service of the recipient or grantee of federal funding;
- Factor 2:** The frequency with which LEP individuals come in contact with the program;
- Factor 3:** The nature and importance of the program, activity, or service provided by the recipient to peoples' lives; and
- Factor 4:** The resources available to the recipient.

KCAPTA updated its 2022 Four Factor Analysis to determine the current language assistance needs of its stakeholders. KCAPTA utilized the results of the analysis to create a Language Assistance Plan (LAP) that would provide the appropriate level and type of assistance for its customers.

KCAPTA's Language Assistance Plan and Four Factor Analysis can be found in **Attachment H**. Census data used to complete the LAP Four Factor Analysis is included within the LAP

Membership of Non-elected Committees

KCAPTA does not approve appointment to the one (1) non-elected committee: The Social Service Transportation Advisory Council (SSTAC) was established to provide broad representation of social services and transit providers representing the elderly, the disabled, and persons of limited means. Members of the SSTAC are appointed by Kings County Association of Governments (KCAG) Board of Directors. Table 1 indicates the racial/ethnicity breakdown of the 2025 membership of the SSTAC. The number of Hispanic members serving on the SSTAC is the second highest group, which has historically increased with recruitment efforts to encourage greater public participation from LEP groups.

Table 1 – Social Service Transportation Advisory Council

	Gender		Race/Ethnicity					
	Male	Female	White	African American	Native American	Asian American	Hispanic	Other
No.	9	12	11	3	0	0	7	0
Percent of Total Council	43%	57%	53%	14%	0%	0%	33%	0%

The main purpose of the SSTAC is to serve as an advisory body to the KCAG Transportation Policy Committee (TPC) regarding the transit needs of the elderly, disabled, and low-income citizens. Responsibilities of the SSTAC include providing input to the TPC on the needs of current and potential fixed-route and paratransit users.

In KCAPTA's September 16, 2022, concurrence letter, the FTA Region IX Civil Rights Officer (CRO) stated that it was not clear how minorities are encouraged to participate on boards. KCAPTA's staff makes an effort to hold meetings at times and locations that are more convenient and accessible for minority and LEP communities, and continues to seek input on potential barriers or challenges that may prevent minority populations from participating in meetings.

Sub-recipient Assistance and Monitoring

Pursuant to 49 CFR 21.5(b)(1) (vii) and guidance provided in FTA Circular 4702.1B Chapter III-10 primary recipients must monitor their sub-recipients for compliance with Title VI regulations. KCAPTA does not allocate or pass through funding to sub-recipients; as such, there is no sub-recipient monitoring to report.

KCAPTA contracts with MV Transportation, Inc. (MV) to provide fix routed, paratransit, and demand response services, as well as reservation, dispatch, and revenue vehicle maintenance. KCAPTA ensures that this contractor complies with Title VI by monitoring the following activities:

1. KCAPTA provides its Title VI Program to MV and receives their acceptance upon each Program update.
2. KCAPTA's Executive Director has provided MV's administrative staff and operation supervisors with the same Title VI training it provides to its own employees. Special "train the trainer" sessions have been provided to MV's general manager and operations supervisors who in turn provide the training to all new hires. Employees receive regular refresher training in Title VI regulations and responsibilities.
3. MV maintains a copy of KCAPTA's Title VI Program at both the KART Transit Station and Dispatch/Maintenance Facility in an area fully accessible to its employees. A copy of the Title VI complaint form and process are posted on the employee bulletin board.
4. KCAPTA's Title VI Notice of Rights is posted in all buses.
5. MV reports all Title VI complaints to KCAPTA within 24 hours and KCAPTA's Transit Manager handles all complaints following the same procedures outlined in **Attachment E**.

Title VI Equity Analysis of Constructed Facilities

In accordance with 49 CFR 21.9 and guidance provided in FTA Circular 4702.1B Chapter III-11, KCAPTA is required to conduct a Title VI equity analysis for new facilities to ensure that locations are selected without regard to race, color, or national origin.

FTA Title VI Circular 4702.1B requires that, "The recipient shall completed 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."

KCAPTA bus terminal is operating above its capacity. With a growing population in need of transit service, increased bad air quality days, and increasing reliability issues resulting from freight train traffic KCAPTA began the process of planning and constructing a new transit center. In 2017, a site selection study was conducted that recommended a preferred location for the new transit center.

Kings County Association of Governments (KCAG) is the designated Metropolitan Planning Organization (MPO) for Kings County and was the lead agency for the KART Transit Center Site Selection Study. During the Site Selection Study, six public meetings were held, to provide information on the project, review site selection criteria, and recommend sites (**Attachment J**). On July 25, 2018, the Kings County Association of Governments accepted the report and recommendation. KCAPTA Board also took action to accept and recommendations (**Attachment K**).

In 2019, KCAPTA completed the Initial Study/Mitigated Negative Declaration for the New KART Transit Center; this included an Equity Analysis (Analysis) **Attachment I**. This project required land acquisition of twelve parcels and would displace three businesses, no residences were displaced. The Analysis was completed that reviewed a variety of impacts associated with the siting of the facility. Section 4 of the Analysis reviewed the Site Selection Study to ensure that the location was selected without regard to race, color, or national origin.

Additional Information Upon Request

At the discretion of FTA, information other than that required by the circular may be requested. FTA has not requested such information, and none have been provided at this time.

3. FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

In accordance with 49 CFR 21.9 and guidance provided in FTA Circular 4702.1B Chapter IV, service standards and policies are required for fixed route services, and are optional for demand response services. The standards and policies must address how services and amenities are distributed across the transit system and must ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population are required to provide additional demographic and service data; however, KCAPTA does not meet this threshold.

4. SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

Specific service standards are required for the following indicators: 1) vehicle load; 2) vehicle headways; 3) on-time performance; 4) service availability (a measure of how routes are distributed within the service area). In addition to the federal requirements for service allocation standards and policies, the Transportation Development Act in California mandates farebox recovery standards.

The successful delivery of transit service is based on two key components: density and demand.

- Density of land uses is one of the most important determinants of transit ridership. Population density is the number of people in a unit of area, such as a square mile or an acre, or more refined units for urban areas. Density can include both residents and employment within the area. The more people there are in an area, the more they will ride transit if it is available. Consequently, population density is considered when determining appropriate service levels. In general, successful transit routes serve corridors with higher population density. The Hanford Lacey Blvd / Centennial Drive area is an example of high employment centers, services and other trip attractors and generators warranting more frequent levels of service.
- Demand is defined as the frequency with which riders use a particular transit service. Demand is often measured in the number of passenger boardings or passenger trips. In areas where population density may

be less concentrated, transit demand can occur if there are trip generators or attractors that make transit attractive to the rider.

KCAPTA's service area includes both high and low-density areas, and the demand for transit service varies significantly in the various communities within Kings County. Due to resource constraints, if demand and/or population density in a corridor fall below one half of KCAPTA's service area average, service may not operate within the standards outline below.

1. *Service Availability*

Fixed route bus service will serve 80 percent of the population in urban areas within half a mile. Service will be provided to all rural communities exceeding 1,000 in population.

2. *Vehicle Load*

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which is 40 passengers for a low-floor 35 foot buses.

On-Time Performance

A vehicle is considered on time 1) if it departs at the schedule departure time or within five (5) minutes of the scheduled departure time and 2) if it arrives within five (5) minutes of the scheduled arrival time. KCAPTA's objective is 85% or greater.

Farebox Recovery Ratio

Per the California Transportation Development Act KCAPTA is required to achieve a fifteen (15) percent farebox recovery ratio.

Table 2: Vehicle Load, On-Time Performance, and Farebox Recovery Ratio

Mode	Vehicle Load	On-Time Performance	Farebox Recovery
Fixed Route			
Local	1.33		
Regional	1.33		
System-wide		85%	15%

3. *Vehicle Headways – Fixed Route*

KCAPTA has no headway standard for its routes, as its services are designed with input from the communities to be serviced. KCAPTA annually evaluates the productivity of its routes; if productivity falls below the performance goal established in the Transportation Development Plan KCAPTA works with the community to develop corrective actions to improve, consolidate, or cancel the service.

Table 3: Local Routes (as of March 1, 2025)

Route	Weekday Peak/Off Peak Headways
Hanford Routes 1 – 9	30/30
Lemoore Route 20	30/30

Table 4: Regional Routes (as of March 1, 2025)

Route	Weekday Peak/Off Peak Headways
Avenal Route 12	4 trips per weekday/ 2 trips Saturday
Corcoran Route 13	3 trips per weekday/0
Laton Route 14	2 trips per weekday/0
Visalia Route 15	4 trips per weekday/2 trips Saturday
Fresno Route 17	2 trips on Wednesday and Friday/0

System-Wide Service Policies

KCAPTA service policies do not discriminate based on race, color, or national origin. KCAPTA System-wide service policies for the following service indicators ensures service design and operations practices do not result in discrimination on the base of race, color, or national origin: 1) distribution of transit amenities (including seating, shelters, printed and digital information and waste receptacles); and 2) vehicle assignment.

1. *Distribution of Transit Amenities*

KCAPTA transit amenities include bus stop signs, benches, shelters, waste receptacles, transit center, and information including printed signs, route maps, schedules, and digital equipment.

The following factors are considered in the determination of how bus stops are improved: passenger volume, access to major activity centers, site specific considerations, accessibility for persons with disabilities, safety, and availability of resources.

KCAPTA follows the following general guidelines for specific amenities:

- New bus shelters, benches and waste receptacles should be provided at stops where 10 passengers or more per day are expected to board buses (safety, space and resources permitting)
- Bus benches and waste receptacles should be provided at stops where 5 passengers or more per day are expected to board buses (safety space and resources permitting).
- Printed information, including route maps and schedule information are provided at the transit center. All bus stops in the system are identified by a standard bus stop sign and include a printed route schedule.

- Real-time digital information signage is provided at the transit center.
2. *Vehicle Assignments*
KCAPTA operates the fixed routes with CNG low floor 35 foot buses. Bus assignments take into account the operating characteristics of the bus and route. Typically newer buses are assigned to regional routes due to the distance traveled and response time to resolve mechanical issues.
3. *Performance Monitoring*
KCAPTA will periodically review the performance of its routes and the distribution of its assets to assess adherence to its adopted standards and policies. A comprehensive evaluation will be conducted at least triennially, based on data collected for National Transit Database reporting. In addition to the triennial monitoring, KCAPTA will attempt to conduct the following monitoring activities:
- On-time performance and farebox recovery rates are reported to the Board of Directors on a monthly base.
 - Service availability, headways, and vehicle assignments will be evaluated during major service changes, comprehensive operation analysis, and other similar planning studies.

Based on the results of the performance monitoring, KCAPTA will prioritize its corrective actions for the lowest-performing routes.

5. LIST OF ATTACHMENTS

- ATTACHMENT A – FTA 2022 Concurrence Letter and Notice of 2025 Title VI Program Update Due Date
- ATTACHMENT B – Board Approval of Title VI Program
- ATTACHMENT C – List of Vital Documents translated into Spanish
- ATTACHMENT D – Notice of Rights and Posting Locations
- ATTACHMENT E – Title VI Complaint Form and Process; Internal Complaint Process
- ATTACHMENT F – Title VI Summary of Complaints, Investigations, and Lawsuits
- ATTACHMENT G – Public Participation Plan
- ATTACHMENT H – Language Assistance Plan and Four Factor Analysis
- ATTACHMENT I – Fixed Facility Analysis
- ATTACHMENT J – List of Meetings
- ATTACHMENT K – Site Selection Study



ATTACHMENT A

**FTA 2022 Concurrence Letter and Notice of 2025 Title VI Program
Update Due Date**



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION 9
Arizona, California,
Hawaii, Nevada, Guam,
American Samoa, and the
Northern Mariana Islands

90 7th Street, Suite 15-300
San Francisco, CA 94103

September 16, 2022

Angie Dow
Kings County Area Public Transit Agency
610 W. 7th Street
Hanford, CA 93230

Re: Triennial Title VI Program Update, Recipient ID: 6529

Dear Angie Dow,

The Federal Transit Administration (FTA) has received and reviewed Kings County Area Public Transit Agency's initial Title VI program submitted on 3/28/2022. This Title VI program will be effective August 1, 2022 - July 31, 2025. The Department of Transportation (DOT) requires recipients of DOT funds to demonstrate compliance with Title VI of the Civil Rights Act of 1964 through regular compliance reports. The Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Grantees" sets forth the information that should be included in these updates, and requires they be submitted as Title VI programs every three years.

FTA's review of your Title VI program considered all elements required by the Department of Transportation regulations found at 49 CFR Part 21, as outlined in Circular 4702.1B. The Review Assessment attached to this letter identifies the specific areas reviewed, any concerns, and relevant reviewer comments. To assure you are implementing Title VI program requirements in accordance with the regulations, you must promptly address and correct any concerns identified with a "no" in the Review Assessment. Your program status is now *Concur – with Comments*. Your next triennial Title VI program submission is due to FTA on June 1, 2025. Please retain documentation as needed to demonstrate the corrections noted have been addressed. FTA typically verifies corrections have been made and implemented at the next oversight opportunity, but can request this information at any time.

Your Title VI program demonstrates your agency has the procedures and resources to ensure public transportation services are provided in a nondiscriminatory manner, as required by Title VI of the Civil Rights Act of 1964. FTA's review and concurrence on a Title VI program does not relieve recipients from the requirements and responsibilities outlined in Circular 4702.1B or of the DOT Title VI regulation at 49 CFR Part 21. You must properly implement your program to ensure nondiscriminatory service, including full and fair participation in public transportation decision-making, and meaningful access to transit-related programs and activities by persons with limited English proficiency. If you use contractors or have subrecipients, you must monitor their compliance with Title VI. You can find these monitoring responsibilities in Chapter 2,

Section 6 (Contractors) and Chapter 3, Section 12 (Subrecipients) in the FTA Title VI Circular. As a basic requirement for Title VI compliance, you must develop a language assistance plan (LAP). Your LAP must include a Four Factor Analysis—you can find information on this analysis in Chapter 3, Section 6 of the FTA Title VI Circular. If you believe that your agency only serves an English-speaking population, you still must complete a Four Factor Analysis to demonstrate this.

FTA is committed to providing technical assistance to help correct your Title VI program and to implement your program consistent with the regulations and guidance. In order to preserve paper, we are issuing this letter electronically via email and it is attached to your profile in TrAMS. Please do not hesitate to contact me directly at 415-734-9475 or at karin.vosgueritchian@dot.gov if you have any questions.

Sincerely,

Karin Vosgueritchian/s/
Civil Rights Officer, Region 9

cc: Ray Tellis, FTA Region 9, Regional Administrator
Monica McCallum, FTA Civil Rights, Director of Regional Operations



ATTACHMENT B

Board Approval of the Title VI Program



ATTACHMENT C

List of Vital Documents translated into Spanish



ATTACHMENT D

Notice of Rights and Posting Locations

**KCAPTA****Kings County Area Public Transit Agency**610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org

Title VI Notice of Rights

KCAPTA operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964 and the Department of Transportation Regulations 49 CFR Part 21. If you believe you have been subjected to discrimination as prohibited by Title VI, you may file a written complaint with KCAPTA. For more information on KCAPTA's Civil rights program, and the procedures to file a complaint, contact KCAPTA below.

KCAPTA opera sus programas y servicios sin tener en cuenta la raza, el color o el origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964 y las Regulaciones del Departamento de Transporte 49 CFR Parte 21. Si cree que ha sido discriminado según lo prohibido por el Título VI, puede presentar una queja por escrito ante KCAPTA. Para obtener más información sobre el programa de derechos civiles de KCAPTA y los procedimientos para presentar una queja, comuníquese con KCAPTA a continuación.

Mail: KCAPTA, Civil Rights, 610 W 7th Street, Hanford CA 93230

Website: <https://www.kartbus.org/title-vi-dbe/> * **Phone:** (559) 852-2717 * **Email:** info@kartbus.org

You may also file a complaint directly with the Federal Transit Administration/ También puede presentar una queja directamente ante la Administración Federal de Tránsito



(559) 852 2717/ Free language assistance/ Asistencia de idioma, gratuita (559) 852-2717



KCAPTA

Kings County Area Public Transit Agency

610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org

List of Title VI Notice Posting Locations

- KART Transit Station
 - Midway Kiosk
 - Ticket Sales/Information Window
 - Driver Break Room

- KCAPTA Administrative Office
 - Reception Area
 - Employee Bulletin Board

- KCAPTA Dispatch/Maintenance Facility
 - Reception Area
 - Break Room
 - Mechanic Break Room

- KCAPTA Website
 - <https://www.kartbus.org/title-vi-dbe>

- All KCAPTA buses



ATTACHMENT E

Title VI Complaint Form and Process Internal Complaint Process

**KCAPTA**

Kings County Area Public Transit Agency

610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY****TITLE VI****COMPLAINT FORM**

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email 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 are 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

**KCAPTA**

Kings County Area Public Transit Agency

610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY****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: _____**Continue on Next Page**

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.

Signature and date required below

Signature_____
Date

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

Kings County Area Public Transit Agency

Title VI Complaint

610 W 7th Street

Hanford CA 93230



KCAPTA

Kings County Area Public Transit Agency

610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org

KINGS COUNTY AREA PUBLIC TRANSIT AGENCY

TITLE VI

COMPLAINT INSTRUCTION

In compliance with U.S. Department of Transportation Title VI regulations (49 CFR Part 21), Kings County Area Public Transit Agency (KCAPTA) operates without regard to race, color, or national origin. Any person who believes he or she has been discriminated against by KCAPTA on the basis of race, color, or national origin may file a Title VI complaint.

A Title VI complaint form can be downloaded at <https://www.kartbus.org/title-vi-dbe/> or by calling (559) 852-2717. If the complainant is unable to write a complaint, a representative may file on his/or her behalf, or KCAPTA staff will provide assistance. Complaints must be filed within 180 calendar days of the alleged incident.

1. KCAPTA will contact the complainant within 10 business days of receipt of complaint.
Any requested information must be received by KCAPTA within 5 days of request
2. KCAPTA will begin the investigation within 15 business days of receipt of complaint if the alleged discrimination is found to be a violation of Title VI regulations.
3. KCAPTA will complete the investigation within 60 calendar days of receipt of a complaint. If additional time is needed for the investigation, the complainant will be notified. A written investigation report will be prepared, including a summary of the incident, investigative findings, and recommended corrective action.
4. A closing letter will be provided to the complainant. The complainant will have 5 business days from the receipt of the closing letter to file an appeal. If no appeal is filed, the complaint will be closed.
5. KCAPTA will forward a copy of the investigation report to the appropriate federal agency, if required.

* KCAPTA will process and investigate all complaints that meet the requirements of Title VI discrimination. If the complainant fails to provide required information within the required timeframe, the complaint may be closed.

Complaint forms should be mailed to KCAPTA, Title VI Complaint, 610 W 7th Street, Hanford CA 93230.

Complaints may also be filed with the Federal Transit Administration, Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington DC 20590 or online at

<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form>

If you need assistance filling out the form or need language assistance contact KCAPTA at (559) 852-2717

**KCAPTA**

Kings County Area Public Transit Agency

610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY****TITLE VI****COMPLAINT FORM**

Sección I:				
Nombre:				
Dirección:				
Teléfono (hogar):			Teléfono (Trabajo):	
Dirección de Correo Electrónico:				
¿ Requisitos de formato accesible?	Impresión Grande		Cinta de Audio	
	Dispositivo para sordos		Otro	
Sección II:				
¿ Está presentando esta queja en su propio nombre?			Sí*	No
* Si respondió "sí" a esta pregunta, vaya a la sección III				
Si respondió "no", Escriba el nombre y la relación de la persona para la queja:				
Por favor explique por qué usted a sometido una queja en nombre de un tercero:				
Por favor confirme que ha obtenido el permiso de la parte agraviada si está presentando la queja en nombre de un tercero.			Sí	No
Sección III:				
Creo que la discriminación que experimenté se basó en (Marqué todas las que apliquen):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional				
Fecha de presunta discriminación (mes, día, año): _____				
Explique lo más claramente posible lo que sucedió y por qué cree que se le discrimina. Describa a todas las personas involucradas. Incluya el nombre y la información de contacto de la persona (s) que discriminó en su contra (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor utilice la parte posterior de este formulario.				
Sección IV:				
¿ Ha presentado anteriormente una queja de título VI con esta agencia?			Sí	No
Sección V:				
¿ Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o con cualquier Corte federal o estatal?				
<input type="checkbox"/> Sí <input type="checkbox"/> No				
En caso afirmativo, marque todas las que correspondan:				



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KINGS COUNTY AREA PUBLIC TRANSIT AGENCY

TITLE VI

COMPLAINT INSTRUCTION

<input type="checkbox"/> Agencia Federal: _____	
<input type="checkbox"/> Corte Federal: _____	<input type="checkbox"/> Agencia Estatal: _____
<input type="checkbox"/> Corte Estatal: _____	<input type="checkbox"/> Agencia Local: _____
Por favor, proporcione información sobre una persona de contacto en la Agencia/Corte donde se presentó la queja.	
Nombre: _____	
Título: _____	
Agencia: _____	
Dirección: _____	
Teléfono: _____	
Sección VI	
Nombre de la otra Agencia que presento la queja: _____	
Nombre de Persona: _____	
Título: _____	
Número de teléfono: _____	

Puede apegar material por escrito o otra información que considere relevante para su queja.

Firma y Fecha abajo es requerida abajo.

Firma

Fecha

Por favor envíe esta forma o entregue en persona a:

Kings County Area Public Transit Agency
Title VI Complaint
610 W 7th Street
Hanford CA 93230



KCAPTA

Kings County Area Public Transit Agency

610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org

KINGS COUNTY AREA PUBLIC TRANSIT AGENCY

TITLE VI

COMPLAINT INSTRUCTION

En conformidad con el Título VI del Departamento de Transporte de EE. UU. (49 CFR parte 21), la Agencia de Transporte Público de Kings County (KCAPTA) opera sin tener en cuenta la raza, el color o el origen nacional. Cualquier persona que crea que ha sido discriminada por KCAPTA sobre la base de raza, color o origen nacional puede presentar una queja por el Título VI.

Se puede descargar un formulario de queja de Título VI en <https://www.kartbus.org/title-vi-dbe> o llamando a (559) 852-2717. Si el reclamante no puede escribir una queja, un representante puede presentar en su nombre, o en persona de KCAPTA le brindará asistencia. Las quejas deben presentarse dentro de los 180 días calendario del presunto incidente.

1. KCAPTA se pondrá en contacto con el denunciante dentro de los 10 días siguientes al recibir la queja. *Cualquier información solicitada debe ser recibida por KCAPTA dentro de los 5 días de la solicitud*
2. KCAPTA comenzará la investigación dentro de 15 días al recibir la queja si se encuentra que la presunta discriminación es una violación de las regulaciones del Título VI.
3. KCAPTA completará la investigación dentro de 60 días al partir de recibir la queja. Si se necesita tiempo adicional para la investigación, se notificará al denunciante. Se preparará un informe de investigación escrito, que incluye un resumen del incidente, los hallazgos de investigación y las medidas correctivas recomendadas.
4. Se enviará una carta de cierre del caso al denunciante. El denunciante tendrá 5 días a partir de recibir la carta de cierre para presentar una apelación. Si no se presenta ninguna apelación, la queja se cerrará.
5. KCAPTA remitirá una copia del informe de investigación a la Agencia Federal correspondiente, si es necesario.

* KCAPTA procesará e investigará todas las quejas que cumplan con los requisitos de la discriminación del Título VI. Si el reclamante no proporciona la información requerida dentro del plazo requerido, la queja puede ser cerrada.

Formularios deben enviarse por correo a KCAPTA, Title VI, 610 W 7th Street, Hanford CA 93230.

Las quejas también pueden presentarse ante la Administración Federal de Tránsito, Oficina de Derechos Civiles, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington DC 20590 o en internet en <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form>

Si necesita ayuda para llenar el formulario o necesita ayuda de idioma, comuníquese con KCAPTA al (559) 852-2717.



ATTACHMENT F

Title VI Summary of Complaints, Investigations and Lawsuits

Title VI Summary of Complaints
2022 - 2025

#	ID	Date of Complaint	Basis	Complaint Summary	Date Closed	Finding
Lawsuits						
None						
Title VI Complaints						
None						



ATTACHMENT G

Public Participation Plan



Kings County Area Public Transit Agency

**PUBLIC
PARTICIPATION
PLAN**

Effective: July 2025 – June 2028

Kings County Area Public Transit Agency
610 W 7th Street
Hanford CA 93230

Title VI Contact: Angie Dow, Executive Director
angie.dow@co.kings.ca.us
(559)852-2691



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1. INTRODUCTION

This Public Participation Plan (PPP, Plan) has been developed in accordance with 49 U.S. C. Sections 5307 (b) and 5307(c) (1) (1); the requirements of the U.S. Department of Transportation (USDOT), including the Federal Transit Administration' (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" issued on October 1, 2012, and Circular 4703.1 "Environmental Justice Policy Guidance for FTA Recipients" issued on December 11, 2012. The Plan also complies with Title VI of the Civil Rights Act of 1964. Compliance with these regulations and guidelines ensures that Kings County Area Public Transit Agency (KCAPTA) provides an opportunity for inclusive and accessible public engagement in its transportation decision – making process.

KCAPTA is committed to providing early, continuous, and meaningful public engagement processes for its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of limited English proficiency (LEP), minority or socioeconomic status, or disability. This Plan has been developed to identify the strategic approach, goals, and guiding principles KCAPTA has established to foster public participation. The Plan also defines how KCAPTA incorporates these standards into its transportation decision making processes by identifying the techniques to use to help increase public participation rates, particularly among those individuals and populations that are often overlooked or underrepresented.

Because each transportation decision is unique and might affect populations and individuals within KCAPTA's service area differently, the techniques used during the public participation process may vary according to each circumstance and should be viewed as a "toolbox" of options, not rigid obligations, chosen with the goal of most effectively reaching out to KCAPTA's diverse communities. KCAPTA has also established baseline methods for its public outreach to ensure that every effort is made to achieve the standards it has set.

It is important to note that KCAPTA is required to implement and comply with specific policies for public engagement, such as Disadvantaged Business Enterprise goal-setting, that may require a departure from this Plan, but that are legitimate and reasonable. Additionally, this Public Participation Plan is a living document, which may evolve according to the demographic makeup of our communities and their unique needs, as well as KCAPTA's evaluation of its public participation effectiveness.

Profile

Kings County Area Public Transit Agency (KCAPTA) began operating the KART Transit System in June of 1980 as a Joint Powers Agency comprised of the County of Kings and the Cities of Hanford, Lemoore, and Avenal. KCAPTA is governed by a five-member Board of Directors (the Board), two of which are appointed from Kings County Board of Supervisors, one appointed from the City of Hanford, one appointed from the City of Lemoore, and one appointed from the City of Avenal.

KCAPTA currently employs 7 individuals. The coach operators, maintenance staff and dispatch staff are provided under contract with MV Transportation.

KCAPTA's Service Area Boundaries

KCAPTA provides public transportation to an approximate 201 square miles of Kings County. Although KCAPTA provides service connections to neighboring counties, its official jurisdictional boundary is confined to the 3 cities and unincorporated areas of Kings County. For the purposes of this LAP, population and other statistical data used to determine limited English proficiency has been limited to its official jurisdictional boundaries.

2. KCAPTA'S STAKEHOLDERS

KCAPTA considers all who reside, work, and travel within Kings County to be stakeholders of the Agency. Communication with the public is a multi-faceted effort of information sharing regarding changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects. A vital component of this communication effort is to evaluate comments, request, and suggestions from the public and to integrate them, as appropriate and when feasible, into KCAPTA's projects and service-related decisions.

The American Community Survey (ACS) data estimates Kings County's population of 152,83 to be 55.2% Male and 44.8% Female, with a median age of 32.3 (Table 1). Kings County's population is 57.5% Hispanic or Latino, 28.8% White, and Black or African American 6.0% (Table 2).

Table 1: Kings County Population Estimates by Sex and Age

Subject	Kings County 2023
Sex/Age	
Total Population	152,830
Male	55.2%
Female	44.8%
Median Age	32.3
18 years and over	72.9%
Male	56.9%
Female	43.1%
21 years and over	68.5%
62 years and over	13.1%
65 years and over	10.6%
Male	47.7%
Female	52.3%

Table 2: Kings County Population Estimates by Race and Ethnicity

Subject	Kings County 2023
Race/Ethnicity	
Total Population	152,830
Hispanic or Latino (of any race)	57.5%
White	28.8%
Black or African American alone	6.0%
American Indian and Alaska Native	0.7%
Asian alone	3.5%
Native Hawaiian or Other Pacific Islander	0.2%
Some other race	0.2%
Two or more races	3.2%

USDOT has adopted the Department of Justice's (DOJ) Safe Harbor Provision, which stipulates that if a recipient of federal funds provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, the total population of persons eligible to be serviced or likely

to be affected or encountered, such action will be considered strong evidence of compliance with the recipient's written translation obligations.

KCAPTA has identified only one LEP population's who meet this threshold and for whom written translation of vital documents is provided in the following language: Spanish.

KCAPTA's stakeholders are, in general, the public-at-large of Kings County, although they can be identified as a broad range of individuals, legislative bodies, social service agencies, and community-based organizations that provide vital links between KCAPTA and its customers, such as:

- Transit customers
- Individuals or groups who are affected by a transit-related project or action
- Residents located within affected geographic areas
- Businesses located within affected geographic areas
- Traditionally under-served and/or under-represented communities or populations
 - Persons with limited English proficiency (LEP)
 - Minorities
 - Persons with disabilities
 - Seniors
 - Veterans
 - Low income communities
- Government agencies and municipalities
- Social service agencies and nonprofits
- Schools and colleges

KCAPTA values the partnership it has established with social service agencies that provide vital links between KCAPTA and its customers. Information sharing is a vital component of public outreach and KCAPTA will continue to preserve and increase its partnerships within our communities.

3. KCAPTA'S STRATEGIC APPROACH TO PUBLIC PARTICIPATION

KCAPTA defines public participation as the process through which stakeholders' concerns, needs and values are incorporated into the public transit decision-making process. Public outreach refers to the efforts made to enable stakeholders to affect and influence decision-making processes related to the delivery of public transportation services such as changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects.

KCAPTA understands that including the public in service planning and project development can be challenging. A great deal of time and effort is required to plan and implement successful outreach efforts; the public may believe that decisions are already "made" and their input will not be considered, while others might have difficulty speaking in public or finding the time to participate. The U.S. Department of Transportation and Federal Transportation Administration has published "Public Involvement Techniques for Transportation Decision-making" to assist transportation entities in identifying myriad tools and techniques to design a public participation effort. KCAPTA has integrated many of these recommendations, as well as other best practices found to promote effective public participation and collaborative decision-making, into the Public Participation Plan.

KCAPTA has established goals and guiding principles for its public outreach efforts which provide a foundation on which KCAPTA can identify the appropriate outreach techniques to improve the public participation process. The ultimate goal of KCAPTA's strategic approach is to increase information sharing, encourage public participation, initiate public input, and integrate the priorities of KCAPTA's customers and stakeholders into its transit-related decision.

Because each transportation decision is unique and might affect populations and individuals within KCAPTA's service area to varying degree, the techniques used during the public participation process may vary according to each circumstance.

KCAPTA's Public Participation Goals

KCAPTA strives to ensure that its public participation efforts are early, continuous, and meaningful. The following public participation goals have been established to meet federal requirements for public participation and increase KCAPTA outreach success:

Implement Consistent Communication

KCAPTA is committed to providing it stakeholders with enough time to participate in the decision-making process to help improve overall participation rates and customer satisfaction.

Increase Diversity

KCAPTA understands that effective and legitimate public participation involves all stakeholders regardless of their race or ethnicity, language, socioeconomic status, or disability. Stakeholders who cannot or who find it difficult to participate because of accessibility issues or language barriers, will be considered and accommodated to the extent possible in all outreach efforts.

Make Public Participation Accessible

KCAPTA will make every effort to ensure public participation opportunities are accessible to persons with disabilities.

Maintain and Identify New Partnerships

KCAPTA values the partnerships it has established with social service agencies that provide vital links between KCAPTA and its customers. Information sharing is a vital component of public outreach and KCAPTA will continue to preserve and increase its partnerships within our communities.

Provide Relevant Information

Public participation is most effective when the information provided is relevant to the specific concerns, interests, and values of affected communities and stakeholders. Information provided to the public should be stated accurately and with an appropriate level of technical detail to be understood by the greatest number of participants.

Clearly Define Potential for Influence

KCAPTA will clearly identify how and to what degree the public's input will be able to influence and have a direct impact on the Agency's decision making. The public will also be clearly informed regarding issues such as budgetary constraints, staffing limitations, or other barriers that may limit KCAPTA's ability to implement certain requests.

Integrate Public Input Into the Decision Making Process

Public comments received by KCAPTA are valued. KCAPTA will record, analyze, and integrate public input to the extent it is relevant, constructive, financially and administratively possible and would result in improved plans, projects, programs, and decisions.

KCAPTA's Public Participation Guiding Principles

The following guiding principals have been identified to assist KCAPTA in achieving its public participation goals: KCAPTA staff when planning for changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects. These guiding principles create a "communication loop" of early, continuous, and meaningful public participation.

1. Identify impacted stakeholders, outreach methods, meeting locations/frequency, and outreach timeline
2. Notify stakeholders of issues under consideration, participation opportunities, and resource availability
3. Provide relevant information and materials and potential for influence

4. Evaluate all public input against financial, regulatory, or administrative constraints
5. Integrate public input into the final transportation decision, as appropriate
6. Inform stakeholders of the evaluation and integration process and why KCAPTA staff made the final decisions

KCAPTA Public Participation Techniques

A one-size-fits-all approach to public outreach does not result in high participation rates; therefore, KCAPTA has identified a range of techniques to be considered at the beginning of its public participation process. Because each transportation decision is unique and might affect populations and individuals within KCAPTA's service area differently, the techniques used during the public participation process may vary according to each circumstance and should be viewed as a "toolbox" of options, not rigid obligations.

Each stage of KCAPTA's communication loop provides an opportunity to identify techniques that are best suited to the nature and scope of the issue under consideration in order to increase the success of the public participation process and result in better outcomes. This process is designed to be used for all of KCAPTA's outreach efforts including changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects.

Each phase of the communication loop is specifically addressed below along with a variety of techniques that may be used to improve the process.

1. Identify

The first phase of KCAPTA's communication loop includes identifying impacted stakeholders, preferable outreach methods, meeting locations/frequency, and creating the overall outreach timeline.

Certain demographic groups may be more impacted than others by a transportation policy or project; therefore, the following stakeholders should be identified during this phase:

- Transit customers
- Individuals or groups who are affected by a transit-related project or action
- Residents located within affected geographic areas
- Business located within affected geographic areas
- Traditionally under-served and/or under-represented communities or populations
 - Persons with limited English proficiency (LEP)
 - Minorities
 - Persons with disabilities
 - Seniors
 - Veterans
 - Low income communities
- Government agencies and municipalities
- Community organizations
- Social service agencies and nonprofits
- Schools and colleges

Techniques

KCAPTA staff may use a variety of techniques to identify impacted stakeholders, preferable outreach methods, determine meeting location frequency, and create the overall outreach timeline, such as:

- Review and analyze demographic maps, transit routes, etc.
- Solicit input from advisory committees and other groups who represent or serve underserved populations
- Create a database of meeting locations that are transit-convenient, ADA accessible, located within impacted communities, and familiar to impacted stakeholders
- Use Gantt charts or other project management tools to establish an outreach timeline
- Schedule meetings at locations and frequencies that are convenient and transit-accessible for minority and LEP communities
- Consider different meeting sizes and formats. Examples include:
 - Board meetings, public hearings
 - Community meetings, drop-in centers
 - Focus groups
 - Open houses, workshops
 - Information booths
- Determine the need for language translation or interpretation

2. Notify

The second phase of KCAPTA's communication loop includes notifying stakeholders of issues under consideration, participation opportunities, and resources availability.

Whether the goal is to reach a broad segment of KCAPTA's stakeholders or to reach a more targeted demographic, identifying the most effective notification methods for each demographic can improve public participation.

Techniques

KCAPTA staff may use a variety of techniques to notify stakeholders of the issues under consideration, the participation opportunities available to them, and how and where they can access resources such as:

- Create a database of media outlets and other non-traditional opportunities to notice public meetings, including those that target impacted stakeholders. Examples include:
 - Traditional media (print)
 - Social media (Facebook, Twitter)
 - Other publications that service minority and LEP populations
 - Schools, libraries, or other locations frequented by impacted stakeholders
 - Online public participation platforms
 - KCAPTA website
- Use alternative distribution formats to notice public meeting. Examples include:
 - Brochures, flyers
 - Direct mailers
 - Email list
 - Press releases
 - Social media (Facebook, Twitter)
 - KCAPTA website
 - Advisory committees and groups who represent or service underserved populations
- Provide opportunities for public comment other than attending meetings and clearly advertise the opportunities. Examples include:
 - Written
 - Email
 - Phone submission
 - Surveys
 - Social media
 - Website

3. Provide Information

The third phase of the communication loop involves providing the public with relevant information and materials and informing them of their potential for influence.

KCAPTA has determined that public participation is most effective when the public is provided information that is relevant to the specific concerns, interests, and values of affected communities and stakeholders and when they have multiple opportunities to receive information and provide input.

Information provided to the public should be stated accurately and with an appropriate level of technical detail so it can be understood by the greatest number of participants. Additionally, KCAPTA will clearly identify how, and what degree, the public's input will be able to influence and have a direct impact on the Agency's decisions. The public will also be clearly informed regarding issues such as budgetary constraints, staffing limitations, or other barriers that may limit KCAPTA's ability to implement certain requests.

Techniques

KCAPTA staff may use a variety of techniques to ensure informational materials are relevant and that the public understands their potential for influence. Examples include:

- Clearly summarize project or policy
- Provide specific project or policy options and clearly identify options that are not available due to financial, administrative, technical, or other reasons
- Avoid technical jargon and complexity
- Use summarized fact sheets to convey project or policy highlights
- Utilize images, photos, diagrams wherever possible
- Provide appropriate language translation of materials for LEP individuals
- Provide appropriate interpretation for LEP individuals
- PowerPoint presentations (emphasize bullet points and diagrams instead of lengthy paragraphs)
- Design surveys to offer specific and feasible project or policy preferences and avoid "open-ended input"
- Consider having meeting facilitated by a neutral party

4. Evaluate

The fourth phase of the communication loop includes evaluating all public input against financial, regulatory, and administrative constraints.

KCAPTA operates within a regulatory environment that may at times preclude certain requests from being implemented; additionally, there may be technical, budgetary, or other barriers that may limit KCAPTA's ability to implement certain requests. For this reason, the evaluation phase of the public participation process most often will be conducted by KCAPTA staff and/or consultants.

The goal of the public outreach effort is to ensure positive outcomes, better solutions, and a transit system that acknowledges the concerns, needs and values of its stakeholders. For this reason, public input is evaluated for integration into the final project or decisions to the extent it is relevant, constructive, financially and administratively feasible.

Techniques

Following closure of the public comment period, KCAPTA staff will categorize and summarize all public input in formats conducive to staff review and evaluation, such as:

- Minutes of all public meetings
- List
- Tables
- Spreadsheets

KCAPTA staff and/or consultants will evaluate public input for integration into its final project or decision by analyzing the following dimensions:

- Administrative feasibility (staffing and labor availability)
- Ethical conformity (negative impacts on minorities, low income, or underserved populations)
- Financial feasibility (budget/funding availability)
- Project effectiveness (improve outcomes and efficiencies)
- Technical feasibility (technological/capacity/resource limitations/public safety)

KCAPTA staff and/or consultants may use the following techniques during their analysis:

- SWOT analysis (strengths, weaknesses, opportunities, and threats of proposed options)
- FOOD analysis (facts, outcomes, options, decision)
- Mapping, planning, and scheduling comparisons (efficiency/effectiveness of proposed options)
- Resources availability analysis (staff/labor, technological/capacity limitations)
- Budget analysis (cost/benefit analysis, budget/funding limitations)
- Legal review (regulatory requirements, equity and civil rights violations, industry best practices)

5. Integrate

The fifth phase of the communication loop involves integrating public input into the final transportation project or decision.

Following the evaluation phase, KCAPTA staff will integrate into the final project or decision the recommendations that have been found to result in positive outcomes, better solutions, and a transit system that acknowledges the concerns, needs, and values of its stakeholders.

Techniques

Examples of techniques to integrate changes and revisions in a manner that preserves the public record and prepares KCAPTA to inform the public of the influence their input resulted in include:

- Revise draft plans, programs, and policies for final approval by the KCAPTA Board of Directors
- Record all public comments received from relevant sources
 - Minutes of all public meetings
 - Written, email, or phone submissions
 - Surveys
 - Comments received from social media
 - Comments received on KCAPTA website
- Describe the mechanism(s) used to evaluate/analyze public comments
 - SWOT analysis
 - FOOD analysis
 - Mapping, planning, and scheduling comparisons
 - Resource availability analysis
 - Budget analysis
 - Legal review
- Include the reasons for accepting or rejecting public comments
 - Administrative feasibility
 - Ethical conformity
 - Financial feasibility
 - Project effectiveness
 - Technical feasibility

6. Inform

The sixth and final phase of the communication loop involves informing stakeholders of the evaluation and integration process and why final decisions were made.

To ensure transparency and complete the communication loop, KCAPTA has developed methods to inform the public of suggestions and requests that were or were not able to be included in the final project or decision, as well as a summary of why these determinations were made. Examples include:

- Include all public comments received:
 - In the appendix of the final plan/project
 - In staff memos presented to the KCAPTA Board
- Include the mechanism for evaluating/analyzing public comments:
 - In the appendix of the final plan/project
 - In staff memos presented to the KCPATA Board
- Include the reasons for accepting or rejecting public comments:
 - In the appendix of the final plan/project
 - In staff memos presented to the KCAPTA Board

4. KCAPTA'S BASELINE METHODS FOR PUBLIC OUTREACH

KCAPTA has established baseline methods for public outreach to comply with DOT, FTA, and title VI requirements and to ensure a process through which stakeholders' concerns, needs, and values are incorporated into the public transit decision-making process.

While this Plan is designed to assist KCAPTA staff in implementing a range of outreach techniques to increase public participation, a baseline of participation methods has been established do not ensue KCAPTA meets the basic requirements for public participation. All public outreach efforts incorporated the requirements of KCAPTA's Language Assistance Plan to ensure meaningful access to persons with limited English proficiency.

The following baseline public participation methods are provided by KCAPTA:

Monthly Board Meetings

The KCAPTA Board of Directors holds monthly public meetings. A public comment period is provided at every board meeting, allowing stakeholders the opportunity to comment on any issue of concern, whether on or not on the agenda.

- All board meetings are noticed at least 72 hours in advance on KCAPTA's website www.kartbus.org, at meeting location, and at the Administrative Office.
- Agendas are available to the public at least 72 hours in advance of board meetings on KCAPTA's website www.kartbus.org, at meeting locations, and at the Administrative Office.
- Accessible formats and language translation or interpretation is provided with advance notice, and instructions on obtaining these services are provided on every agenda.

Public Hearings

In accordance with 49 USC Chapter 53, Section 5307, recipients of federal grants must have a locally developed process to solicit and consider public comments before implementing a major reductions in service or an increase in bus fares. The Agency's Public Hearing Policy can be found in **Appendix A**.

Transit Service and Fares

KCAPTA conducts public hearing for major service changes or any increase in its fare structure.

- KCAPTA will hold one or more public hearings, depending on the nature of the service change or fare increase and the impacted population(s).
- At least two weeks notice will be provided for public hearings, and information on submitting written, email, verbal, or telephone comments is provided for those unable to physically attend the hearings.
- Public hearings will be noticed in both English and Spanish and will include KCAPTA's Safe Harbor notice of language service in English and Spanish.
- Public hearings will be advertised in local newspapers of record with broad distribution, as well as targeted distribution to relevant language groups and affected communities, as appropriate.
- Public hearings will be advertised onboard KCAPTA buses and on the KCAPTA website www.kartbus.org during the two-week notice period.
- Bilingual (English/Spanish) Staff will be present at every public hearing.
- Accessible formats and language translation or interpretation will be provided with advance notice, and instruction on obtaining these services will be provided on every public notice.
- All public hearing presentation materials will be provided in English and Spanish.

Community Outreach

Stakeholder Surveys

KCAPTA conducts surveys in both English and Spanish to gauge the opinions of its customers and the community at large. These surveys allow KCAPTA to identify program strength and weakness while developing strategies for enhancing services, thereby improving mobility for all within KCAPTA's service area. Service planning and marketing decisions require a solid foundation of quality, current data regarding travel patterns, customer perceptions, the customer profile, and demand for public transit service.

Community Meetings

On occasion, KCAPTA staff conducts public educational/informational meetings on a variety of topics of interest to the public. These meetings may also be used to supplement the public hearings process for projects that could benefit from additional outreach opportunities. Potential meeting formats may include, but are not limited to:

- Drop-in centers
- Focus groups
- Open houses
- Workshops
- Presentations at senior centers community organizations, etc.

To maximize participation by the public, a variety of methods are utilized, including:

- Information booth at Transit Station
- Handing out Notices in English and Spanish on the bus and at the Transit Station.

KCAPTA Travel Trainers

KCAPTA Travel Trainers provide free fixed-route training to teach interested individuals how to safely and independently ride the KCAPTA bus system. KCAPTA offers this training to individuals or small groups. Training is tailored to the individuals/group's needs.

Paratransit Outreach

KCAPTA is committed to assisting persons with disabilities or other travel challenges to ensure that they receive the same level of mobility and travel independence on public transit that other customers enjoy.

In compliance with the Americans with Disabilities Act of 1990, KCAPTA offers ADA paratransit program to customers who have a disability that prevents them from using KCAPTA's regular fixed-route bus service. This service is a shared-ride program and its buses are fully accessible and equip with wheelchair lifts.

Public Notices

Notice will be mailed to our Paratransit Clients regarding Major Services Changes or Fare Increases that have a direct impact to our Paratransit Service. These notices will be sent in both English and Spanish.

Stakeholder Surveys

Occasionally, KCAPTA will conduct surveys via mail in both English and Spanish to gauge the opinions of our paratransit customers. These surveys allow KCAPTA to identify program strengths and weaknesses while developing strategies for enhancing services, thereby improving mobility for all within KCAPTA's service area. Service planning and marketing decisions require a solid foundation of quality, current data regarding travel patterns, customer perceptions, the customer profile, and demand for public transit service.

Routine Public Information

Social Media

KCAPTA uses several social media formats to keep its customers informed of issues such as holiday schedules, route detours, and other alerts. KCAPTA currently uses the following social media platforms:

- Facebook
- X formally known as Twitter
- Instagram
- Snapchat

Printed Materials

KCAPTA provides a wide range of printed materials to educate, inform and promote its transit services to the public. Examples of KCAPTA's printed materials include:

- KART Riders Guide
- ADA Paratransit Guide

Website

KCAPTA maintains a website www.kartbus.org to provide a wealth of valuable information and is equipped with Google Translate to provide language translation in over 100 languages. Information included in the website includes, but not limited to the following:

- Complete Rider's Guide
- Trip Planner
- Route and Schedules
- Fares
- Real Time Bus Arrival Information

5. OUTREACH EFFORTS OVER PAST THREE YEARS

The following public hearings, scoping meetings, and request for public comments took place over the last three years (April 2022 - February 2025).

- On April 27, 2022, KCAPTA held a public hearing proposing route modifications and service changes.
- On July 27, 2022, KCAPTA held a public hearing to receive comments on proposing route modifications.

- On December 7, 2022, KCAPTA held a public hearing to receive comments on proposing route modifications.
- On February 22, 2023, KCAPTA held a public hearing to receive testimony concerning any unmet transit needs that may exist within our service area.
- On March 22, 2023, KCAPTA held a public hearing to receive testimony concerning any unmet transit needs that may exist within our service area.
- On February 28, 2024, KCAPTA held a public hearing to receive testimony concerning any unmet transit needs that may exist within our service area.
- On March 27, 2024, KCAPTA held a public hearing to receive testimony concerning any unmet transit needs that may exist within our service area.
- On May 22, 2024, KCAPTA held a public hearing proposing route modifications and service changes.
- On September 25, 2024, KCAPTA held a public hearing to receive testimony on proposed 2025 – 2027 DBE Business Goals.
- On February 26, 2025, KCAPTA held a public hearing to receive testimony concerning any unmet transit needs that may exist within our service area.

The following community events and presentations were attended by KCAPTA staff:

DATE:	EVENT:	SPONSOR/HELD BY:
4/7/2022	Outreach @ Terminal- route 14 - 17 and FLEX changes	KART
4/19/2022	Outreach @ Terminal - Mask Mandate Change	KART
4/29/2022	Eagle Dayz	Westhills College
All Thursdays in May 2022	Thursday Night Market	KART
5/17/2022	Shopping KART- Outreach	KART
5/19/2022	Outreach @ Terminal -UBER	KART
June 2nd and 9th 2022	Thursday Night Market	KART
6/3/2022	Outreach @ Wells Fargo	KART
6/14/2022	Remington Senior Living (UBER)	KART
6/15/2022	Outreach - library (UBER)	KART
6/15/2022	Outreach - clinics of Hanford (UBER)	KART
6/20/2022 & 06/24/2022	Outreach @ Terminal (Summer 3 Month Pass)	KART
7/7/2022	Thursday Night Market	KART
7/28/2022 & 07/29/2022	Outreach @ Terminal (route 17 changes)	KART

8/1/2022-8/22/2022	Lemoore High School Orientation	Lemoore High School District
8/3/2022-8/4/2022	Hanford High School Orientation	Hanford High School District
8/16/22-8/18/22	Westhills Resource Days	Westhills College
9/1/2022	Outreach @ Terminal (Labor Day Closed)	KART
9/26/2022	Outreach @ City of Kettleman (route signs updated)	KART
9/29/2022	Shopping KART- Outreach	KART
10/5/2022	Shopping KART- Outreach (Pablo Councilman of Avenal)	KART
10/6/2022	Thursday Night Market	KART
10/7/2022	Outreach @ Kings County Office of Education	KART
10/13/2022	Outreach @ Westhills College (new guides to Student Union)	KART
10/15/2022	Outreach @Avenal (rode bus to announce Shopping KART)	KART
10/20/2022	Disabilities Awareness	Westhills College
10/25/2022	Red Ribbon/ National Night Out	City of Lemoore
11/16/2022	Outreach @ Terminal (Holiday Hours)	KART
11/23/2022	Outreach @ Terminal (Free Transit in Dec.)	KART
12/15/2022	Outreach @ Terminal (Holiday Hours)	KART
1/10/2023	Outreach @ Terminal (Holiday Hours)	KART
1/19/2023	Westhills Back to Spring Semester	Westhills College
1/20/2023	IHSS- County of Kings	Kings County Human Resources
1/24/2023	Outreach @ Westhills College (new guides to Student Union)	KART
2/6/2023	Outreach @ Terminal (Unmet Needs)	KART
2/8/2023	Valley Christian Home - information day	Valley Christian Home
2/13/2023	Outreach @ Terminal (Holiday Hours)	KART
2/23/2023	Cal-Trans Open house @ Kettleman City	CAL-TRANS
3/3/2023	ADMIN Office- ECOLANE APP	KART
3/10/2023	Outreach @ Hacienda and Senior Homes of Hanford	KART
3/20/2023	Outreach @ Terminal (3 Month Spring Pass)	KART
4/11/23-4/13/23	Avenal Resource Center (shuttle bus)	Avenal
4/14/2023	Food Bank @ Avenal High School	Food Bank
4/26/2023	Avenal Shuttle @ Avenal Senior Center	KART
5/5/2023	Outreach on Paratransit buses	KART
5/18/2023	Fuel For Finals @ Westhills College	Westhills College
5/22/2023	Outreach @ Terminal (Holiday hours)	KART

5/26/2023	Hanford Civic Center Senior Breakfast	Kings County Commission on Aging
6/15/2023	Elder Abuse @ Armona Senior Center	Kings County Commission on Aging
6/26/2023	Outreach @ Terminal (Holiday Hours)	KART
8/7/23-8/8/23	Lemoore High School Orientation	Lemoore High School District
8/9/2023	Hanford East High Orientation	Hanford High School District
8/11/2023	Hanford West High Orientation	Hanford High School District
8/11/2023	Back to School Bash @ Salvation Army	Salvation Army
8/24/2023	Westhills College Resource Fair	Westhills College
8/30/2023	Outreach @ Terminal (Holiday Hours)	KART
8/31/2023	Home Garden Clinic - Info on Paratransit/ UBER	KART
9/15/2023	Senior Day @ Burris Park	Kings County Commission on Aging
9/18/23-9/29/23	Riding buses- switching UBER to Ecolane	KART
10/1/23-10/31/23	Riding buses informing them of NO MORE UBER	KART
10/19/2023	Service Day @ Kettleman City park	Kings County
10/30/2023	Outreach @ Terminal (Holiday Hours)	KART
11/6/2023	Outreach @ Terminal (Holiday Hours)	KART
11/28/2023	Adventist Clinic in Lemoore visit	KART
12/11/2023	Outreach @ Terminal (holiday hours)	KART
1/8/2024	Outreach @ Terminal	KART
2/12/2024	In Coming Freshman @ Lemoore High	Lemoore High School District
2/13/2024	Outreach @ Avenal Senior Center- UNMET NEEDS	KART
2/15/2024	Outreach @ Avenal Senior Center-Shopping KART New Hours	KART
3/4/2024	Outreach @ Terminal - NEWS 2 weeks FREE	KART
3/18/2024	Outreach @ Terminal - 3 month SPRING PASS	KART
3/29/2024	Hanford Civic Park Easter Egg Hunt - sign ups for Boys & Girls Club	City of Hanford
4/4/2024	Valley Christian Home - information day	KART
4/10/2024	Boys & Girls Club - Hanford Lincoln Park	Boys & Girls Club
4/19/2024	Eagle Days @ Lemoore College (formerly known as Westhills)	Lemoore College (Westhills)
5/14/2024	Fuel For Finals @Lemoore College	Lemoore College (Westhills)
5/20/2024	Outreach @ Terminal (Holiday Hours)	KART
5/31/2024	Outreach @ Terminal & buses- System Survey	KART
6/1/2024	Services Fair @ Home Garden Park	Home Garden
6/14/2024	Elder Abuse @ Armona Senior Center	Kings County Commission on Aging

6/28/2024	Outreach @ Terminal (Holiday Hours)	KART
7/19/2024	Outreach @ Terminal (tv raffle)	KART
8/5/24-8/6/24	Lemoore High School Orientation	Lemoore High School District
8/9/2024	Backpack Give Away @ Salvation Army Hanford	Salvation Army
8/20/2024	Resource Days @ Lemoore College	Lemoore College (Westhills)
9/20/2024	Senior Day @ Burris Park	Kings County Commission on Aging
9/23/2024	Outreach @ Terminal (3 month pass)	KART
10/17/2024	DSPS for the disabled @ Lemoore College	Lemoore College (Westhills)
10/24/2024	Public Safety Day @ Kettleman City Park	Kings County
10/29/2024	National Night Out @ Heritage Park Lemoore	City of Lemoore
11/4/2024	Outreach @ Terminal (Holiday Hours) Veterans Day	KART
11/15/2024	Outreach @ Terminal (Holiday Hours Thanksgiving)	KART
12/5/2024	Outreach @ Hanford Library - Info on bus system	KART
12/13/2024	Outreach @ Terminal (Holiday Hours) Closure	KART
1/13/2025	Outreach @ Terminal (Holiday Hours)	KART
1/21/2025	Resource Days @ Lemoore College	Lemoore College (Westhills)
2/6/2025	Valley Christian Home - information day	KART
2/12/2025	Outreach @ Terminal (Holiday Hours)	KART

6. CONCLUSION

This Public Participation Plan must, first and foremost, be accountable to the public. The strategic approach, goals, and guiding principles KCAPTA has established are intended to foster public participation by providing early, continuous, and meaningful public engagement processes for its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of limited English proficiency (LEP), minority or socioeconomic status, or disability. The methods and techniques employed by KCAPTA help increase public participation rates, particularly among those individuals and populations that are often overlooked or underrepresented.

The Plan has also been prepared to guide and support KCAPTA staff in complying with 49 U.S.C Sections 5307(b), and 5307 (c) (1)(1), USDOT requirements including the FTA Circular 4702.1B and Circular 4703.1, and Title VI of the Civil Rights Act of 1964. Compliance with these regulations and guidelines ensures that Kings County Area Public Transit Agency (KCAPTA) provides an opportunity for inclusive and accessible public engagement in its transportation decision-making process.

While the methods and techniques used during the public participation process may vary according to each circumstance, KCAPTA will make every effort to achieve the standards it has to set and design public outreach efforts with the goal of most effectively reaching out to the diverse population throughout KCAPTA's service area. As a living document, the Plan may evolve according to the demographic makeup of KCAPTA communities and their unique needs, as well as KCAPTA's evaluation of its public participation effectiveness.

Appendix A: KCAPTA Public Hearing Policy

Objective:

To establish a locally developed process for soliciting and considering public comments for major service changes and fare increases.

Definition of Public Hearing Requirements:

In accordance with 49 USC Chapter 53, Federal Transit Laws, Section 5307, a grantee must have a locally developed process to solicit and consider public comment before raising a fare or carrying out a major reduction in service. The regulation does not require that fare decreases, service increases, or "special fares" be preceded by public comment. The grantee is not required to hold a public meeting, but must offer an opportunity for one. The grantee must establish guidelines or thresholds for what is considered a "major" change to be.

Threshold for Public Hearing Requirements:

The KCAPTA Board defines a major change as one that results in a 25% or greater decrease in vehicle service hours, changes in routing that result in KCAPTA vehicles utilizing new public streets and/or corridors not previously used by any route (excluding major arterial and collector streets, streets designated as a truck route, or a State-owned roadway), or any increase in fare structure. Changes not meeting this threshold do not require a public comment process.

Exceptions to the Public Hearing Requirements:

- a. A reassignment of route numbers resulting from combining existing routes, which results in the creation of a new route "number".
- b. Standard seasonal variations, unless the variation, as compared to operations during the previous season, falls within the definitions of major adjustments of transit service listed above.
- c. Emergency service changes, including changes in routes or service frequencies which may be necessitated due to a disaster which severely impairs public health or safety, changes in access to public streets, or the ability of the Agency equipment to travel on public streets.
- d. The introduction or discontinuance of short-term or temporary service which will be/has been funded primarily through grants or third-party contracts.
- e. Changes to service on a route with fewer than ten total trips in a typical service day.

Public Hearing Guidelines:

1. The Executive Director, Transit Manager or the KCAPTA Board of Directors will authorize the holding of a public hearing(s).
2. At least two weeks' notice to the public shall be given prior to each hearing.
3. The public shall be invited to submit written, email, or verbal comments if they cannot attend the hearing.
4. Publicity for the hearing and written comments shall at a minimum include:
 - Advertisements in the Hanford Sentinel in both English and Spanish
 - Notice Posted on all Social Media in both English and Spanish
 - Notice Posted on the Buses in both English and Spanish
 - Notice Posted in the Information Area and at the Administrative Offices in both English and Spanish.

Consideration of Public Comments:

1. KCAPTA shall provide the Board of Directors with all comments submitted by the public.
2. The Board will consider all comments submitted during the public hearing process.
3. The Clerk to the Board shall document each speaker's name and a brief summary of their comments.
4. The Board will take no final action until the public's written and oral comments have been presented at the final public hearing.



KCAPTA

Kings County Area Public Transit Agency

610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org

List of Title VI Notice Posting Locations

- KART Transit Station
 - Midway Kiosk
 - Ticket Sales/Information Window
 - Driver Break Room
- KCAPTA Administrative Office
 - Reception Area
 - Employee Bulletin Board
- KCAPTA Dispatch/Maintenance Facility
 - Reception Area
 - Break Room
 - Mechanic Break Room
- KCAPTA Website
 - <https://www.kartbus.org/title-vi-dbe>
- All KCAPTA buses



ATTACHMENT H

Language Assistance Plan and Four Factor Analysis

KINGS COUNTY AREA PUBLIC TRANSIT AGENCY LANGUAGE ASSISTANCE PLAN

Effective: July 2025 – June 2028

Kings County Area Public Transit Agency
610 W 7th Street
Hanford Ca 93230

Title VI Contact: Angie Dow, Executive Director
angie.dow@co.kings.ca.us
(559) 852-2691

1. EXECUTIVE SUMMARY

Title VI of the Civil Rights Act of 1964, 49 U.S.C 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives federal financial assistance.

In compliance with the Title VI regulations, including U.S. Department of Justice (DOJ) 28 CFR § 42.401 et seq., and 28 CFR § 50.3; U.S. Department of Transportation (DOT) 49 CFR part 21; and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency” (2000), Kings County Area Public Transit Agency (KCAPTA) has developed this Language Assistance Plan (LAP). Per guidance found in FTA Circular 4702.1B and DOT LEP Guidance 70 FR 74087, December 14, 2005, KCAPTA has taken “reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who have limited-English proficiency.” Title VI regulations define limited English proficient (LEP) individuals as those who speak, read, write or understand English “less than very well.”

KCAPTA supports the goal of Title VI and believes that providing language assistance will have a positive impact on Kings County’s LEP population and its ridership in general. This Language Assistance Plan, effective June 1, 2025 to June 1, 2028, reflects KCAPTA’s compliance with federal Title VI regulations and its continuous efforts to ensure meaning full access to transit services for all persons, regardless of race, color, or national origin.

Using the four-factor analysis proscribed by USDOT, KCAPTA has assed the language needs within its service area, which includes the Cities of Hanford, Lemoore, Avenal, Kettleman City, Stratford, Corcoran, Laton, and Kings County.

According to USDOT guidance and Circular 4702.1B Chapter III-7 Section 9 (a), the federally-funded recipient’s obligation to accommodate LEP populations is determined by balancing the flowing four factors:

- Factor 1:** the number of proportion of LEP persons eligible to be serviced, or likely to be encountered, by a program, activity, or service
- Factor 2:** the frequency with which LEP individuals come in contact with the program, activity, or service
- Factor 3:** the nature and importance of the program, activity, or service to people’s lives
- Factor 4:** the resources available to the recipient

To address Factor 1, KCAPTA incorporated the most recently available data from the 2019 U.S. Census American Community Survey (ACS) and the California Department of Education (CDE), which identified one (1) LEP language groups within the service area that meet the DOJ’s Safe Harbor threshold of “five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be serviced or likely to be affected or encountered” by KCAPTA. The language identified is Spanish.

To address factors 2 and 3, KCAPTA reviewed employee survey responses to determine the frequency with which LEP individuals encounter its programs, activities, or services, and how important these programs, activities, or services are to their daily lives.

After assessing the first 3 factors, KCAPTA weighed the demand for language assistance against it current financial and personnel resources and developed a language assistance implementation plan that includes the following fore elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance

3. Training KCAPTA staff
4. Providing notice of LEP customers
5. Monitoring and updating the LEP

The Language Assistance Plan will be a valuable resource to KCAPTA employees who work daily to provide Kings County residents and visitors meaningful access to public transportation and will help ensure these benefits, services, and information are equally shared by those with limited-English proficiency. A copy of all census data used to complete the Four Factor Analysis can be found in **Appendix A**.

2. INTRODUCTION

Kings County Area Public Transit Agency (KCPTA) operations in Kings County began in June of 1980 as a joint powers agency comprised of the county of Kings and the Cities of Hanford, Lemoore, and Avenal. KCAPTA is governed by a five-member Board of Directors (the Board), two of which are appointed from the King County Board of Supervisors, one appointed from the City of Hanford, one appointed from the City of Lemoore and one appointed from the City of Avenal.

In 2024, KCAPTA's fixed route fleet of 29 buses boarded 454,460 passengers, while the demand response service carried 21,999 passengers with a fleet of 14 vehicles.

KCAPTA currently employs 7 administrative staff. All other staff members are provided under contract with MV Inc.

SERVICE AREA BOUNDARIES

KCAPTA provides public transportation to Kings County. Although KCAPTA provides service connections within neighboring counties, its official jurisdictional boundary is confined to Kings County. For the purposes of this Language Assistance Plan, population and other statistical data used to determine limited English proficiency have been limited to its official jurisdictional boundaries.

SERVICE AREA POPULAITON

KCAPTA is accountable to a diverse population of individuals who reside, work, and travel within Kings County. American Community Survey 2023 5-yr data estimates Kings County's population of 152,83 to be 55.2% male and 44.8% female, with a media age of 32.3 (Table 1)

Table 1: Kings County Population Estimates by Sex and Age

Subject	Kings County 2023
Sex/Age	
Total Population 152,830	
Male	55.2%
Female	44.8%
Median Age 32.3	
18 years and over	72.9%
Male	56.9%
Female	43.1%
21 years and over	68.5%
62 years and over	13.1%
65 years and over	10.6%
Male	47.7%
Female	52.3%

Table 2: Kings County Population Estimates by Race and Ethnicity

Subject	Kings County 2023
Race/Ethnicity	
Total Population 152,830	
Hispanic or Latino (of any race)	57.5%
White	28.8%
Black or African American alone	6.0%
American Indian and Alaska Native	0.7%
Asian alone	3.5%
Native Hawaiian or Other Pacific Islander	0.2%
Some other race	0.2%
Two or more races	3.2%

To determine KCAPTA's obligation to accommodate LEP population within its service area, the following FTA recommended four-factor analysis was conducted and is detailed in the following section.

3. FOUR –FACTOR ANALYSIS

The safe Harbor provision of FTA Circular 4702.1B stipulates that “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, such action will be considered strong evidence of compliance with the recipient's written translation obligations.”

KCAPTA has identified one (1) LEP population of that constitutes more the 5% and/or 1,000 or more individuals who speak English “less than very well” and for whom notices of language assistance and written translation of vital documents is required: Spanish.

According the USDOT guidance, the federally-funded recipient's obligation to accommodate LEP population is determined by balancing four factors:

- Factor 1:** the number of proportion of LEP persons eligible to be serviced or likely to be encountered, by a program, activity or service
- Factor 2:** the frequency with which LEP individuals come in contact with the program, activity, or service
- Factor 3:** the nature and importance of the program, activity, or service to people's lives
- Factor 4:** the resources available to the recipient

Factor 1: Identification of LEP Individuals

“The greater number or proportion of LEP individual from a particular language group served or encountered in the eligible service population, the more likely language services are needed....” (DOT LEP Guidance Section V (1)).

American Community Survey Data (ACS)

For Factor 1, KCAPTA analyzed census data from the ACS 2023 5-year estimates to determine the number or proportion of LEP persons eligible to be serviced or likely to be encountered by a program, activity, or service provided by KCAPTA. The ACS census data estimate that of the total population in KCPATA's service area aged five years and over who speak a language other the English, 28,465 individuals speak English less than very well.

This number represents KCAPTA's LEP population and is 20.1% of the total KCAPTA service area population of 141,762.

The number of Spanish speaking persons who speak English less than "very well" (28,795) far exceeds the Safe Harbor threshold, which is strong evidence that the translation of documents by KCAPTA is a vital necessary practice.

Table 3: Kings County LEP Estimates for Population 5 Years and Over

	<i>ACS LEP Population (speaks English less than very well)</i>	<i>% of Total Population</i>	<i>% of Total LEP Population</i>
<i>Total Population ACS 2023</i>	<i>141,762</i>	<i>28,465</i>	<i>20.1%</i>
<i>Spanish or Spanish Creole:</i>	<i>26,337</i>	<i>18.6%</i>	<i>92.5%</i>
<i>French</i>	<i>17</i>	<i>0.0%</i>	<i>0.1%</i>
<i>German</i>	<i>45</i>	<i>0.0%</i>	<i>0.2%</i>
<i>Russian</i>	<i>-</i>	<i>0.0%</i>	<i>0.0%</i>
<i>Other Indo-European</i>	<i>437</i>	<i>0.3%</i>	<i>1.5%</i>
<i>Korean</i>	<i>64</i>	<i>0.0%</i>	<i>0.2%</i>
<i>Chinese</i>	<i>332</i>	<i>0.2%</i>	<i>1.2%</i>
<i>Vietnamese</i>	<i>107</i>	<i>0.1%</i>	<i>0.4%</i>
<i>Tagalog</i>	<i>884</i>	<i>0.6%</i>	<i>3.1%</i>
<i>Other Asian</i>	<i>111</i>	<i>0.1%</i>	<i>0.4%</i>
<i>Arabic</i>	<i>2</i>	<i>0.0%</i>	<i>0.0%</i>
<i>Other and unspecified languages</i>	<i>135</i>	<i>0.1%</i>	<i>0.5%</i>

Using ACS data, KCAPTA's two (2) language groups were identified by their estimated population within each of KCAPTA's cities (Table 4). This information will assist KCAPTA in identifying concentrations of specific language groups within its service area and providing appropriate language assistance for public hearings, meetings, written materials, and other outreach efforts.

Table 4: KCAPTA LEP Population by City

Geography	Spanish	LEP Percentage	Tagalog (Filipino)	LEP Percentage
Avenal	9,463	21.4%	13	0.6%
Corcoran	10,508	23.8%	22	1.1%
Hanford	16,015	36.2%	1,026	51.2%
Hardwick	78	0.2%	-	
Kettleman City	785	1.8%	-	
Laton	357	.8%	-	
Lemoore	6,334	14.3%	943	47.1%
Stratford	685	1.5%	-	
Total Kings County by Cities	44,225		2,004	

California Department of Education Data

FTA guidelines recommend that alternate and local sources of data are analyzed when conducting a four-factor analysis. KCAPTA reviewed data from the California Department of Education (CDE) to identify the number of English-learner students enrolled in Kings County's school districts. Of Kings County's total school population, 5,238 are English learners (Table 5)

Table 5: Total Kings County 2023-24 English Learner Enrollment

Total Kings County School Population	29,411
Total English learner population	5,238 (17.8 % of total school population)

KCAPTA also reviewed the 2022-23 CDE enrollment data which broke down the total number of English learner students by their primary languages (Table 6). This alternate data source supports the ACS analysis Spanish as the one language that falls outside of the Safe Harbor Provision.

Table 6: English Learner Students by Language

Language	English Learners	Percent of Total English Learners
Spanish	5,029	96.0%
Arabic	107	2.0%
Philippine Languages	29	0.6%

Portuguese	11	0.2%
Uncoded Languages	11	0.2%
Other non-English Languages	51	1.0%
Total	5,238	

Summary

KCAPTA began the Factor 1 assessment by reviewing the most recent U.S. Census American Community Survey estimate data. The results of this assessment confirmed that Spanish meet FTA's Safe Harbor threshold of 5% or 1,000 persons of the total population of persons eligible to be served or likely to be affected or encountered within KCAPTA's service area. Data from the California Department of Education identified Kings County's school Spanish population of English learners, which aligned with ACS data.

The Tagalog (Filipino) population estimates (884) was close to meeting the 1,000-person Safe Harbor threshold. U.S. Census Data estimates were used to identify concentrations within our service area and determine Tagalog (Filipino) population was very concentrated in Hanford and Lemoore but was non-existence in other areas. Data from the California Department of Education did not support the population estimates with only 29 (0.6%) Philippine English Learner Students.

Given the high population of LEP Spanish speakers within KCAPTA's service area translation of documents by KCAPTA is a vital and necessary practice.

Factor 2: Frequency of Contact by LEP Persons with KCAPTA Services

"Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed" (DOT LEP Guidance Section V (2)).

KCAPTA used two sources to determine how frequently LEP individuals use KCAPTA services and how often KCAPTA staff comes in contact with or assists LEP individuals:

1. KCAPTA Survey
2. KCAPTA prior experience

Transit Rider Survey

The objective of the survey was to gain insight into KCAPTA customers' opinions spanning across KCAPTA service and compile a demographic profile of the typical KCAPTA rider. The only other language besides English identified was Spanish. 27% of the surveys completed (verbally or written) were in Spanish. No other alternative language was requested.

KCAPTA Prior Experience

KCAPTA's prior experience with limited English proficiency persons has been with Spanish-speaking individuals. Staff has encountered Spanish-speaking individuals at outreach activities, at the customer service window, and at public meetings.

KCAPTA's Contractor, MV Transportation, staff has also encountered Spanish-speaking individuals at the customer service window, at the bus terminal, on the bus, and on the phone.

Factor 2 assessment, the frequency with which LEP individuals come in contact with the program, activity, or service was determined by reviewing survey data.

Table 7: Survey results on the frequency with LEP individuals

Language	Daily	Frequently	Sometimes	Not at All
Spanish	65.3%	12.5%	20.8%	1.4%

Tagalog (Filipino)	0%	5.6%	33.3%	61.1%
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This data aligned with ACS high population of LEP Spanish speakers and with the ACS population estimates for Tagalog (Filipino) population estimates.

Factor 3: The Nature and Importance of the Program, Activity, or Service to People's Lives

"The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed". (DOT LEP Guidance Section V (3))

There are a number of key interaction points with the bus system which could prove problematic for LEP populations:

- KCAPTA website
- Customer service phone lines
- Printed schedules
- Driver inquires

Ensuring that critical information at these interaction points is available in languages commonly spoken is crucial to providing equitable access to KCAPTA's bus services for LEP populations.

Summary

At this point in the Four Factor Analysis, factors 1, 2, and 3 have confirmed that:

- The most prevalent non-English language spoken in the KCAPTA service area is Spanish, accounting for 18.6% of KCAPTA's total population;
- KCAPTA's LEP language group, Spanish is represented as the top English-learner students in Kings County schools;
- Survey respondents 65% communicated in Spanish daily and 0% communicated in Tagalog (Filipino) daily
- Language assistance was not requested by LEP customers in any other language than Spanish

It can be concluded that KCATPA's LEP language group is Spanish. The final step of the required Four Factor analysis will discuss the resources available to develop a language implementation plan to ensure meaningful access for LEP individuals.

Factor 4: Resources Available to the Recipient and Cost

"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons." (DOT LEP Guidance Section V (4))

Factor 4 is designed to weigh the demand for language assistance against current and projected financial and personnel resources. According to the Department of Transportation, "Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the cost imposed substantially exceed the benefits." USDOT has advised recipients to carefully explore the most cost-effective means of delivering "competent and accurate" language services to address resource concerns.

Current Language Assistance Measures and Costs

KCAPTA currently provides a wide range of information in Spanish

- At a minimum there is one (1) staff person available during operating hours that is bilingual in English and Spanish.
- A Spanish interpreter can be present at public meeting if requested.
- Public Hearings are noticed in English and Spanish
- Public Hearing materials are provided in English and Spanish
- KCAPTA vital documents are available in Spanish
- Nearly all of KCAPTA's printed materials, including Rider's Guides and brochures are available in English and Spanish.
- Information transit-related signage on buses is in English and Spanish

Currently, KCAPTA has been successful in utilizing staff in providing language assistance and translation for Spanish-Speakers. The annual cost associated with the designing and printing of KCAPTA's Riders Guides and other support materials is \$22,000.

Given the percentage of Spanish-speaking LEP individuals in KCATPA's service area, and their reliance on KCAPTA's transit services, it is fitting the KCAPTA continues to provide written translation and verbal interpretation services to this population.

Language Assistance Measures July 2025 – June 2028

Currently, most of the costs associated with providing Spanish-language translation and interpretations service are for printed materials and notices. KCAPTA will continue to utilize staff for the Spanish-language translation and interpretations. Language Line Solutions services will be used on an as needed bases. Section 4 below outlines KCAPTA's Language Implementation Plan which is intended to support KCAPTA staff in complying with Title VI regulations.

4. LANGUAGE IMPLEMENTATION PLAN

Department of Transportation LEP guidance notes that effective language implementation plans typically included the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons and 5) monitoring and updating the plan.

ELEMENT 1: IDENTIFYING LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

As discussed in the Four Factor Analysis, KCAPTA reviewed sources to identify its LEP population. One (1) LEP language groups (Spanish) met the Safe Harbor threshold of five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be serviced or likely to be affected or encountered with KCAPTA's serves area.

ELEMENT 2: PROVIDING LANGUAGE ASSISTANCE MEASURES

KCAPTA uses a number of techniques and practices to provide productive opportunities for all interested Kings County residents to participate in relevant programs, activities, and services that are being offered or will continue to be offered by KCAPTA including the following:

- Maintain a list of employees who competently speak Spanish and are willing to provide translation and/or interpretation services and distribute this list to staff that regularly have contact with the public.
- Vital documents are available in both English and Spanish.
- Public Notices are available in both English and Spanish.
- General information, such as “Riders Guide” is available in both English and Spanish
- Transit Fares are posted in both English and Spanish
- Outreach meetings/forums are regularly conducted in the County to inform communities of the services offered by KCATPA. In areas identified with a high concentration of LEP KCAPTA staff will work with other agency to insure bilingual staff is available to translate information.
- If needed Language Line Solutions will provide translation.

ELEMENT 3: TRAINING STAFF

The following training procedure will be implemented by KCATPA:

- KCAPTA currently informs all newly-hired employees of Title VI regulations and their responsibility to assist LEP customers in obtaining language assistance.
- Contracted coach operators, operations supervisors, dispatch, and customer service receive regular Title VI refresher training throughout the year.
- Both KCAPTA staff and Contractor staff will be informed of the language assistance services offered to the public by KCAPTA.
- Staff will be trained on whom to contact when professional interpreter services are required.
- Staff will receive training on how to handle a potential Title VI/LEP complaint
- Staff will receive training on how to document language assistance request.

ELEMENT 4: PROVIDING NOTICE TO LEP PERSONS

KCAPTA will use a variety of methods to ensure LEP persons are aware of existing and new language assistance measures by:

- Notifications posted in KCAPTA’s reception area and meeting rooms.
- Notification posted on the KCAPTA website.
- Flyers for major community workshops and similar meetings include instruction on how to request translation services.
- Notification posted in KCAPTA Riders’ Guide

ELEMENT 5: MONITORING AND UPDATING THE PLAN

KCPATA will monitor its implementation of this Title VI Language Assistance Plan as follows:

- KCAPTA will survey employees annually regarding their interaction with LEP individuals
- Whenever public hearings are noticed, KCAPTA will consider the impact the proposed fare increase; service change, reduction, or loss; or major project will have on KCAPTA's Safe Harbor language populations and will provide notice in appropriate languages.
- KCAPTA's Notice of Language Assistance will be included in all notices of public meetings, including board agendas.
- KCAPTA will monitor requests for translation and adjust practices to meet demand while maintain a basic level of access by LEP populations.
- KCAPTA will monitor whether the need for translation services has changed
- KCAPTA will determine whether its financial resources are sufficient to fund language assistance resources needed.
- KCPATA will communicate with LEP individuals by including question about langue assistance and information needs on any community surveys.
- On a triennial basis, KCAPTA will review and update census and other LEP data and update its Language Assistance Plan accordingly.

APPENDIX A: CENSUS DATA

DP05: ACS 5-Year Estimates Data Profiles	Kings County, California	
Label	2023 - Estimate	
SEX AND AGE		
Total population	152,830	
Male	84,389	
Female	68,441	
Sex ratio (males per 100 females)	123.3	
Under 5 years	11,068	
5 to 9 years	9,706	
10 to 14 years	13,851	
15 to 19 years	10,774	
20 to 24 years	11,886	
25 to 34 years	25,463	
35 to 44 years	22,664	
45 to 54 years	16,782	
55 to 59 years	7,748	
60 to 64 years	6,667	
65 to 74 years	9,751	
75 to 84 years	4,578	
85 years and over	1,892	
Median age (years)	32.3	
Under 18 years	41,374	
16 years and over	115,997	
18 years and over	111,456	
21 years and over	104,680	
62 years and over	19,965	
65 years and over	16,221	
18 years and over	111,456	
Male	63,443	
Female	48,013	
Sex ratio (males per 100 females)	132.1	
65 years and over	16,221	
Male	7,733	
Female	8,488	
Sex ratio (males per 100 females)	91.1	

RACE		
Total population	152,830	
One race	121,878	
Two or More Races	30,952	
One race	121,878	
White	70,362	
Black or African American	9,782	
American Indian and Alaska Native	2,931	
Aztec	446	
Blackfeet Tribe of the Blackfeet Indian Reservation of Montana	85	
Maya	50	
Native Village of Barrow Inupiat Traditional Government	0	
Navajo Nation	93	
Nome Eskimo Community	0	
Other American Indian and Alaska Native	2,257	
Asian	5,381	
Asian Indian	141	
Chinese	628	
Filipino	3,033	
Japanese	126	
Korean	173	
Vietnamese	163	
Other Asian	1,117	
Native Hawaiian and Other Pacific Islander	395	
Chamorro	71	
Native Hawaiian	213	
Samoan	44	
Other Native Hawaiian and Other Pacific Islander	67	
Some Other Race	33,027	
Two or More Races	30,952	
White and Black or African American	1,489	
White and American Indian and Alaska Native	939	

White and Asian	1,262	
White and Some Other Race	24,640	
Black or African American and American Indian and Alaska Native	83	
Black or African American and Some Other Race	203	
Race alone or in combination with one or more other races		
Total population	152,830	
White	100,148	
Black or African American	12,089	
American Indian and Alaska Native	4,754	
Asian	7,791	
Native Hawaiian and Other Pacific Islander	1,289	
Some Other Race	59,086	
HISPANIC OR LATINO AND RACE		
Total population	152,830	
Hispanic or Latino (of any race)	87,860	
Mexican	81,398	
Puerto Rican	1,189	
Cuban	228	
Other Hispanic or Latino	5,045	
Not Hispanic or Latino	64,970	
White alone	43,991	
Black or African American alone	9,143	
American Indian and Alaska Native alone	1,107	
Asian alone	5,338	
Native Hawaiian and Other Pacific Islander alone	295	
Some Other Race alone	264	
Two or More Races	4,832	
Two races including Some Other Race	693	

Two races excluding Some Other Race, and three or more races	4,139	
Total housing units	46,695	
CITIZEN, VOTING AGE POPULATION		
Citizen, 18 and over population	94,189	
Male	53,860	
Female	40,329	
C16001 ACS 5-Year Estimates Detailed Tables	Kings County, California	
Language spoken at home for the population 5 years and over	Estimate	Margin of Error
Total:	141,762	±6
Speak only English	82,029	±1,739
Spanish:	53,500	±1,688
Speak English "very well"	27,169	±1,635
Speak English less than "very well"	26,331	±1,692
French, Haitian, or Cajun:	226	±118
Speak English "very well"	209	±112
Speak English less than "very well"	17	±22
German or other West Germanic languages:	224	±132
Speak English "very well"	179	±132
Speak English less than "very well"	45	±39
Russian, Polish, or other Slavic languages:	55	±51
Speak English "very well"	55	±51
Speak English less than "very well"	0	±32
Other Indo-European languages:	1,558	±413
Speak English "very well"	1,121	±359
Speak English less than "very well"	437	±206
Korean:	79	±78

Speak English "very well"	15	±17
Speak English less than "very well"	64	±65
Chinese (incl. Mandarin, Cantonese):	585	±311
Speak English "very well"	253	±134
Speak English less than "very well"	332	±269
Vietnamese:	173	±105
Speak English "very well"	66	±39
Speak English less than "very well"	107	±102
Tagalog (incl. Filipino):	2,097	±316
Speak English "very well"	1,213	±246
Speak English less than "very well"	884	±198
Other Asian and Pacific Island languages:	652	±251
Speak English "very well"	541	±243
Speak English less than "very well"	111	±78
Arabic:	188	±156
Speak English "very well"	186	±155
Speak English less than "very well"	2	±5
Other and unspecified languages:	396	±268
Speak English "very well"	261	±174
Speak English less than "very well"	135	±141



ATTACHMENT I

Fixed Facility Analysis

**KCAPTA Title VI Analysis
for
Kings County Area Public Transit Agency
KART Transit Station**

Prepared for:



Kings County Area Public Transit Agency
610 W. 7th Street
Hanford, CA 93230

Prepared by:



16431 Scientific Way
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October 2019



1.0 INTRODUCTION

The purpose of this equity analysis is to demonstrate that the Kings County Area Public Transit Agency (KCAPTA), which plans to construct and operate the Kings Area Rural Transit (KART) Station in the City of Hanford, is in compliance with Title VI of the Civil Rights Act of 1964, its implementing regulations, and guidance from the Federal Transit Administration (FTA).

KCAPTA, responsible for the planning and operation of KART and KART Paratransit, is committed to ensuring that no person is excluded from participation in or denied the benefits of its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964. In addition to following Title VI of the Civil Rights Act of 1964, the Kings County Area Public Transit Agency prohibits discrimination based on gender, age, income, or disability.¹

2.0 REGULATORY BACKGROUND

2.1 Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964² states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” This statute applies to the KART Station project because KCAPTA is receiving partial funding for it from the FTA.³

2.2 Criteria for Facility Siting

Title 49, Part 21 of the Code of Federal Regulations (CFR) establishes criteria for compliance with Title VI in selecting transit facilities. FTA Circular FTA C 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*,⁴ gives guidance to public transit agencies in complying with Title VI and 49 CFR Part 21.

“Facilities” include, among other things, storage facilities, maintenance facilities, and operations centers.⁵ The proposed KART Station is clearly a facility under this regulation. In order to comply with 49 CFR Part 21:⁶

- The recipient 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.

1 Kings County Area Public Transit Agency – Title VI Program Update, Revision 1, June 2019 - 2022. www.kartbus.org/wp-content/uploads/2019/08/KCAPTA-Title-VI-Program-Rev_1.pdf. Accessed on October 10, 2019.

2 Public Law 88-352, Title VI, § 601, July 2, 1964; codified at 42 U.S. Code § 2000d - Prohibition against exclusion from participation in, denial of benefits of, and discrimination under federally assisted programs on ground of race, color, or national origin.

3 Email from Angie Dow, Executive Director, Kings County Area Public Transit Agency, Hanford, CA to Margaret Partridge, UltraSystems Environmental Incorporated, Irvine, CA. September 19, 2019.

4 Title VI Requirements and Guidelines for Federal Transit Administration Recipients. U.S. Department of Transportation. Federal Transit Administration. Circular FTA C 4702.1B, October 1, 2012. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

5 Circular FTA C 4702.1B, Chapter III-11.

6 Ibid.



- Recipients shall engage in outreach to persons potentially impacted by the siting of facilities.
- The Title VI equity analysis must compare the equity impacts of various siting alternatives.
- The analysis must occur before the selection of the preferred site.

2.3 Kings County Area Public Transit Agency Title VI Program

As a frequent recipient of federal funding for its public transit system, the Kings County Area Public Transit Agency has developed and periodically updates a formal program for complying with Title VI.⁷ Major elements of the program include complaints of discrimination procedure, a limited English proficiency plan, a public participation plan, and service standards and policies, each of which is described below.

2.3.1 Complaints of Discrimination Procedure

This section describes KCAPTA's procedures for investigating and resolving Title VI complaints and information on obtaining a complaint form. If a complainant is unable or incapable of providing a written statement, a representative can be used. Title VI complaints must be filed within 180 days of the date of the alleged discrimination. Upon receiving a complaint, KCAPTA will provide the complainant with a written acknowledgement of receipt within five working days. As of the time of this report release, KCAPTA has not received a Title VI complaint and no Title VI-related lawsuits have been filed against KCAPTA.

The investigator will respond as follows to a complaint:

- Contact the complainant of the status of the complaint within 10 days of its receipt.
- Request additional information, if the complaint is to be investigated. Additional information must be received within five days of the request.
- Begin investigation within 15 working days of receipt of the complaint, if it is to be investigated.
- Complete investigation and a written investigative report within 60 calendar days of receipt of the complaint.
- A closing letter will be sent to the complainant, who will have five working days to file an appeal. The complaint will be closed if no appeal is filed.
- A copy of the investigative report will be sent to appropriate federal agencies if necessary,

2.3.2 Limited English Proficiency Plan

Per Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency,"⁸ KCAPTA is federally mandated to develop and implement a Language Assistance Plan (Plan) by which limited English proficiency (LEP) persons can meaningfully access translations of

⁷ Kings County Area Public Transit Agency – Title VI Program. June, 2019.

⁸ Published at 65 Federal Register 50121-50122. Aug. 11, 2000.



written and oral information. Moreover, under Title VI of the Civil Rights Act, EO 13166, and various directives from the U.S. Department of Justice and U.S. Department of Transportation, recipients of federal financial assistance must take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently.

In compliance with these regulations, KCAPTA conducted a “four-factor analysis” to determine the extent to which LEP services are required and in which languages.⁹ To ensure non-discriminatory services to LEP persons, a four-factor analysis will be performed every three years. The four factors and a summary of the City of Hanford’s analyses thereunder are:

Factor 1 - The number or proportion of LEP persons eligible to be served or likely to be encountered by KCAPTA’s programs, services, or activities. Through review of U.S. Census Bureau American Community Survey data for 2011-2015, the City determined that 16.8% of the total population five years and older speak English “less than very well.” Of this population, the most prevalent group was identified as LEP persons who speak Spanish. Spanish speakers represent about 90.2% of the LEP group.

Factor 2 - The frequency with which LEP persons come into contact with the program. KCAPTA conducted a survey of LEP persons and used prior experience to determine the frequency of contact with LEP persons, as well as the language spoken. Results of the surveys indicate that Spanish is the most prevalent language spoken by the LEP population in Kings County.

Factor 3 - The nature and importance of the program, activity, or service provided by the program to people’s lives. KCAPTA acknowledges that important information on KCAPTA’s website, customer service phone lines, printed schedules, and driver inquiries must be presented in commonly spoken languages for equitable access amongst LEP populations.¹⁰

Factor 4 - The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. KCAPTA created an inventory of language assistance measures currently provided and determined what, if any, additional services are needed to provide meaningful access. KCAPTA relevant programs activities and services that are being offered include:

- Maintain an inventory of employees who speak Spanish and are willing to provide translation and/or interpretation services. This list will be distributed to staff who regularly have contact with the public.
- Vital documents and most printed materials are available in both English and Spanish.
- During outreach meetings and forums in areas identified with a high concentration of LEP, KCAPTA staff will work to ensure that bilingual staff are available to provide translation services.

⁹ Circular FTA C 4702.1B, Chapter III-7.

¹⁰ Kings County Area Public Transit Agency – Title VI Program. June, 2019. p. 47



2.3.3 Public Participation Plan

As required by Circular 4702.1A, KCAPTA prepared a Public Participation Plan to promote public involvement in transit planning and decision making. The objectives of the Plan are:¹¹

- Implement consistent communication.
- Increase diversity.
- Make public participation accessible.
- Maintain and identify new partnerships.
- Provide relevant information.
- Clearly define potential for influence.
- Integrate public input into the decision-making process.

KCAPTA provides opportunities for public comment and strives to find new opportunities to solicit public comments from all segments of the population. Comments are accepted by phone, fax, email, U.S. mail, in person, or at any open meeting. Opportunities for comment include monthly KCAPTA Board meetings, KCAPTA and Kings County Association of Governments annual public hearings, and tri-annual rider surveys. Additionally, all public notices are available in English and Spanish. Moreover, accessibility services and special accommodations, including translators, special assistance, and/or transportation are provided for public meetings.

To engage Title VI protected groups, defined as groups of people that have been historically discriminated against based on their race, national origin, religion, ability, age and sex,¹² staff also attends various community events and presents at various organizations, school systems, and senior organizations to assist in information collection and feedback solicitation to see what services are sought by LEP population.

2.3.4 Service Standards and Policies

Circular FTA C 4702.1B requires federally funded transit agencies to develop and publish service standards and policies to serve as bases for determining whether there is discrimination by race, color, or national origin.¹³ To insure compliance with the Title VI Program, KCAPTA has adopted the following indicators to maintain consistency to all participants of public transportation.¹⁴

The measures implemented include:

- **Vehicle Load:** The average of loads at peak operating time will not surpass 40 passengers per low-floor 35-foot bus.

11 Kings County Area Public Transit Agency – Title VI Program. June, 2019. p. 27

12 Droste, M. What Are “Protected Classes.” Subscript Law, December 4, 2018. Internet Address: <https://www.subscriptlaw.com/blog/protected-classes>. Accessed September 17, 2019.

13 Circular FTA C 4702.1B, Chapter IV-4.

14 Kings County Area Public Transit Agency – Title VI Program. June, 2019. p. 6-7



- **Vehicle Headways:** Defined as “the amount of time between two vehicles traveling the same direction on a given line or combination of lines.”¹⁵ KCAPTA does not have a headway standard for its routes. KCAPTA conducts an annual evaluation to determine demand on fixed routes and whether the frequency of headways needs to be adjusted and works with the community to do so.
- **On-time performance:** Defined as bus arrives within five minutes of the scheduled time and no later than five minutes after the scheduled departure time for fixed routes. The goal is 85% or higher.
- **Service availability:** A measure of the distribution of routes in City Transit’s service area. The fixed bus service will serve 80% of the urban area population within a half mile.
- **Farebox recovery ratio:** KCAPTA must achieve a 15% farebox recovery ratio, based on the California Transportation Development Act.
- **Distribution of transit amenities:** Defined as items of comfort and convenience, such as benches and shelters, available to the general riding public. KCAPTA developed benchmarks to determine placement of benches and shelters.
- **Vehicle Assignment:** Defined as the process by which transit vehicles are assigned to routes due to variation (age, type, size), type of service offered (express or local), timing of vehicle assignment, and other factors. Vehicles are distributed equally for each area.
- **Performance Monitoring:** KCAPTA will review route performance to determine if it is meeting the adopted standards and policies. Comprehensive evaluation will be held triennially.

3.0 PROJECT DESCRIPTION

The proposed project would include the demolition of existing structures and construction of a new transit station and commercial development. The approximately four-acre project site is located in the downtown area of the City of Hanford, CA, and has been previously developed. The proposed project would consist of an approximately 19,000-square-foot Transit Station Building, offsite parking, and onsite bus parking. The transit building includes 6,900 square feet on the first floor, 5,516 square feet on the second, and 6,557 square feet on the third floor, totaling approximately 19,000 square feet for the entire building. The ground floor includes space for KART bus operators, a training room, a large central waiting area with an information kiosk, and additional meeting spaces with movable walls to accommodate events of varying sizes. The open atrium in the center waiting area would extend to the second floor. The third floor would be similar to the second without the open atrium, and would contain office space leasable to tenants. The proposed project also includes 21 sawtooth bus bays, 17 staff parking spaces, eight secure staff parking spaces, and 105 park-and-ride spaces for transit users. Additionally, two electric bus chargers and two electric car chargers would be constructed onsite.

¹⁵ Circular FTA C 4702.1B, Chapter IV-5.



4.0 SITE SELECTION

In July 2018, Mott MacDonald prepared the KART Transit Station Site Selection Study for the Kings County Association of Governments (KCAG).¹⁶ KCAG performed the study to provide KCAPTA with a new location for the Kings Area Rural Transit system. The goals of the study were to identify the future location, footprint of the facility, and next steps for implementation. The study was completed in three phases: (1) Potential Site Identification; (2) Preferred Sites Selection; (3) Recommended Site Selection.

Although there were procedural departures, KCAG complied throughout the site selection study with the requirement to ensure that the location was selected without regard to race, color, or national origin. The four criteria in Section 2.2 of this equity analysis were taken into account as follows:

The recipient 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.

Although a formal Title VI equity analysis was not prepared in the early planning stage of the project, the race, color or national origin of any group of Kings County citizens was completely disregarded.

Recipients shall engage in outreach to persons potentially impacted by the siting of facilities.

During Phase 3 of the site selection study, stakeholder interviews were conducted, and feedback was used to modify the boundaries of the three preferred project sites. The preferred sites were then subject to additional analysis and final screening. During Phase 2 of the study, points were assigned to each proposed site based on stated stakeholder preference. Three points were assigned if stakeholders indicated strong preference, one point if neutral, and none if there was strong objection. Additionally, public outreach has been planned for project implementation. The next steps include, “encourage strong community engagement including not-for-profit agencies in the planning process...”¹⁷ Therefore, the opinions of those community members who are potentially impacted will be considered and accounted for during the planning process.

The Title VI equity analysis must compare the equity impacts of various siting alternatives.

Potential impacts to disadvantaged communities were considered during all three phases of the site selection study. During Phase 1, designated disadvantaged communities were identified pursuant to Senate Bill 235. Five preliminary sites were shown to fall within disadvantaged communities. During Phase 2, points were assigned to these sites based on their potential to disproportionately negatively impact the identified disadvantaged communities. Lastly, during Phase 3, the three preferred sites were evaluated based on their potential to have disproportional negative impacts to low-income and minority communities. Of the three preferred sites, none was determined to impact these communities. Ultimately, Site 7 was chosen as the recommended site. As will be discussed below, no equity impacts are associated with the chosen site.

¹⁶ KART Transit Station Site Selection Study—Final. Prepared by Mott MacDonald for Kings County Association of Governments. July 3, 2018.

¹⁷ KART Transit Station Site Selection Study, p. 74.



The analysis must occur before the selection of the preferred site.

Sixteen potential sites were identified at the start of the study. Next, three preferred sites were screened, and one the recommended site was chosen. All analysis took place prior to selection of the preferred site.

5.0 DEMOGRAPHIC ANALYSIS

Demographic data from the U.S. Census Bureau's American Community Survey 5-Year Estimates¹⁸ are presented in **Table 5.0-1**. The project is in Block Group 5 of Census Tract 9. The location of the project with respect to local Census geographical units is shown in **Figure 5.0-1**. Block Group 5 and Census Tract 9 contain about 5% and 15% of the city's total population, respectively.

Table 5.0-1
COMPARISON OF RACIAL AND ETHNIC COMPOSITION,
CITY OF HANFORD AND PROJECT AREA

	Block Group 5 (Census Tract 9)	Census Tract 9	City of Hanford	Kings County
Total Population	2,805	8,546	55,599	150,183
White ^a	2,141	7,283	44,550	104,588
Non-White	664	1,263	11,049	45,595
Percent Non-White	23.7%	14.8%	19.9%	30.4%
Limited English Proficiency	844	1,985	8,922	25,680
Percent Limited English Proficiency	34.0%	25.4%	17.4%	18.6%

Source: (U.S. Census Bureau, 2018) 2013-2017 American Community Survey 5-Year Estimates.

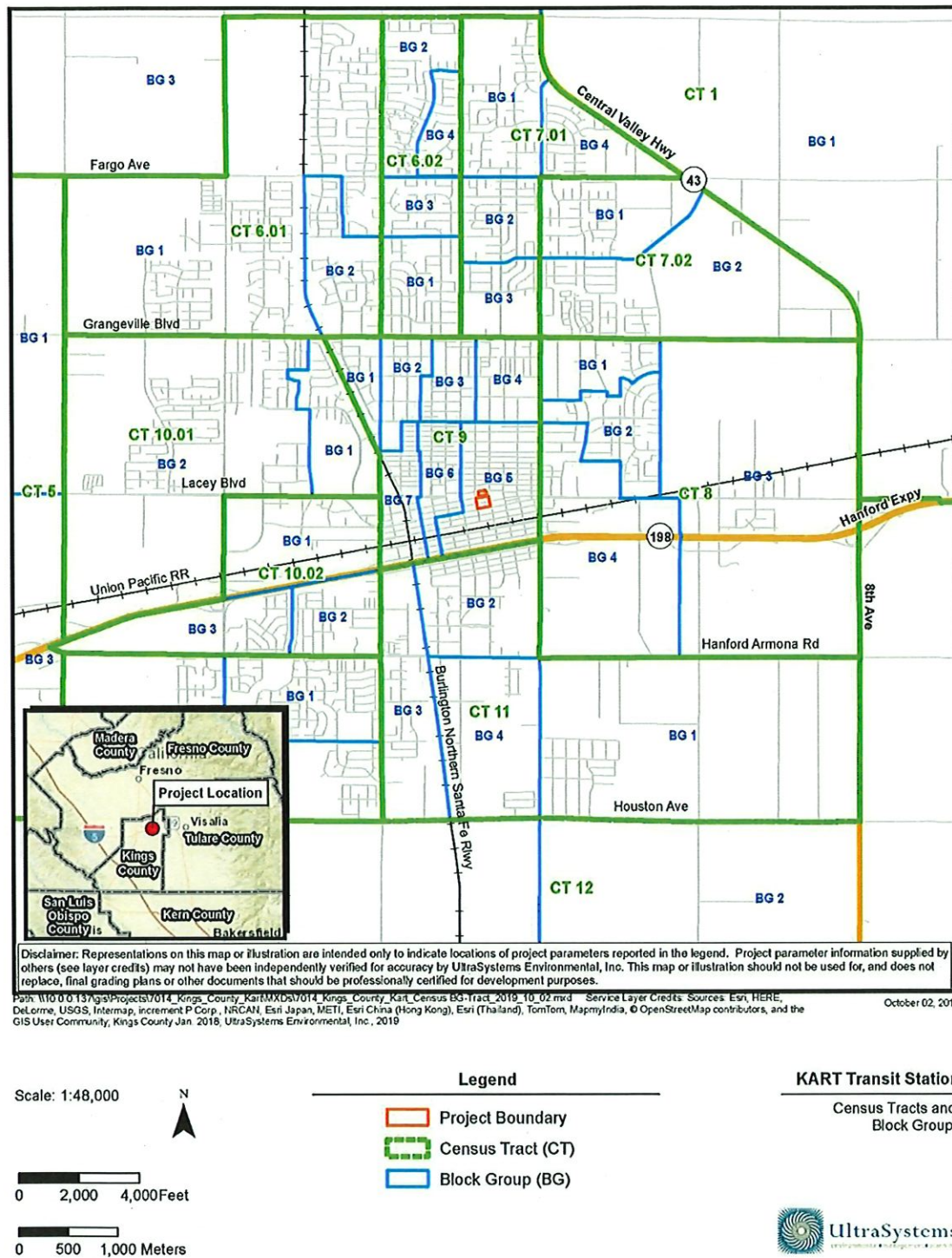
^aEstimate of white population includes white alone or in combination with one or more other races.

As seen in **Table 5.0-1**, the block group in which the KART station will be located has a higher percentage of nonwhite residents than does the city as a whole. Because all the KCAPTA bus routes will start and end at the station, being closest to the station gives the minority population easier access to more transportation services than is available to the city population as a whole. This relationship does not hold for Census Tract 9, however, because it has a lower nonwhite population percentage than does Hanford as a whole.

The new station will be only a few blocks from the old one, so that no one, of whatever race, color, or national origin, will be have more difficult access to the station than he or she does now. Similarly, the project does not include changes to any current bus routes, and it increases the frequency of service for passengers in all parts of the city of Hanford. Therefore, the project itself does not discriminate on the basis of race, color, or national origin.

18 U.S. Census Bureau, 2018. 2013-2017 American Community Survey 5-Year Estimates. Accessed online at: <https://www.census.gov/programs-surveys/acs> on September 25, 2019.

Figure 5.0-1
CENSUS TRACTS AND BLOCK GROUPS SURROUNDING PROJECT SITE



6.0 PUBLIC OUTREACH

KCAPTA's public outreach to date has included:

- **Stakeholder Interviews and Meetings:** February 2018
- **KCAPTA Board Public Meeting for Preliminary Site Selection:** February 28, 2018
- **KCAPTA Board Public Meeting for Site Selection:** June 27, 2018
- **Developed an informational meeting flyer for distribution:** June 21, 2019, for meeting held July 31, 2019
- **Informational Meeting:** July 31, 2019

Meetings were held in February 2018 with stakeholders to identify their preferences on project site location.¹⁹ Interviews were in person or over the phone. A standard set of 17 questions was used in order to gather valuable information about stakeholders' opinions and inside knowledge about the sites that were under consideration.

The KCAPTA Board held a public board meeting on February 28, 2018. The site selection study and three phases of the project were presented. The Board members reviewed the three potential sites and made comments asking the team to evaluate the cost of displacing businesses currently on the sites and the effect on traffic. After the discussion between the Board and KCAPTA staff, the public was invited to make comments. No public comments were made (Board Meeting Tapes February 27, 2018).

The KCAPTA Board held a public board meeting on June 27, 2018. The final site was presented and the process of the site selection was discussed. Site #7 was picked in part because it was close to a signalized intersection, near government and social services, and stakeholder preference. The next steps were discussed, mainly that NEPA would need to be completed before an offer could be made. Councilmembers made comments regarding adding an electric vehicle station, plants for landscaping, and if the property owners had been contacted yet. It was confirmed that the property owners were contacted and they were all willing to sell. After the discussion between the Board and KCAPTA staff, the public was invited to make comments. No public comments were made and the Board approved the motion to go forward with Site #7 (Board Meeting Tapes June 27, 2018).

At 5:00 p.m. on July 31, 2019, KCAPTA held its first and only public informational meeting to date. A flyer in English and Spanish announcing the meeting was distributed on June 21, 2019, and accommodations were offered to those who required extra assistance to attend. Twelve people signed in. From 5:15 p.m. to 5:30 p.m., an open house forum was conducted. The next 45 minutes were filled with a PowerPoint presentation, which covered project purpose, project background and description, and next steps. It also included an explanation of how to comment on the project. To conclude the meeting, 15 minutes were allotted for questions. Participants were allowed to leave their contact information and comment. No comments were left at the meeting.

Questions and concerns were brought up by attendees during the meeting. The first issue brought up was about the preference for the first floor to be all retail. It was explained, however, that funding for

¹⁹ KART Transit Station Site Selection Study, p. 42.



the project is only for transit. There was a concern about homeless issues in Kings County and it was confirmed that there will be paid security at the transit center to stop loitering. It was also confirmed that the existing transit station would have a bus stop to provide connectivity to the Amtrak station. People also had questions about the businesses currently on the property of the new transit station. It was confirmed that consultants would be hired to help businesses relocate and that property owners within a 500-foot radius were notified. Attendees were also concerned about dust from bus operations and it was confirmed that there would be no dust and that the plan is to change to energy-efficient vehicles by 2026.

In addition to these questions and concerns, attendees discussed project scheduling, the site plan, high-speed rail, and funding.

7.0 CONCLUSIONS

The site for the proposed KART facility was selected without regard to race, color, or national origin. KCAPTA is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its service on the basis of race, color or national origin under Title VI of the Civil Rights Act of 1964 and has a formal program to implement the provisions of Title VI, its implementing regulations, and Federal Transit Administration guidance. In conclusion, the KART project is not expected to result in disparate impacts to Title VI populations.



ATTACHMENT J

List of Meetings

KART Station Site Selection Study - KCAG

PROJECT DESCRIPTION	AGENCY	MEETING TYPE	DECISION / INFO	DATE
KART Station Site Selection Study Consultant Kickoff Meeting	KCAPTA/KCAG/Consultants*	Consultation #1	Project vision/goals, opportunity site, project constraints, project mgmt. plan, stakeholder outreach, next steps	11/20/17
KART Station Site Selection Study Project Technical Advisory Committee	KCAPTA/KCAG/Consultants/ City of Hanford City Manager	Consultation #2	General update, information gathering, stakeholder outreach, prelim sites selection, KCAPTA Board presentation preparation	2/15/18
KART Station Site Selection Study Stakeholders Advisory Group Outreach	Consultants	n/a	Interview stakeholders	2/20/18
KART Station Site Selection Study Public presentation	Kings County Area Public Transit Agency Board/Consultants	Public Meeting / Information	3 preferred sites overview	2/28/18
KART Station Site Selection Study Site Plan Workshop	KCAPTA/KCAG/Consultants	Consultation #3	General update, site design development	4/12/18
KART Station Site Selection Study Technical Advisory Committee	KCAPTA/KCAG/Consultants	Consultation #4	General update, P3 overview, conceptual design of recommended site	4/18/18
KART Station Site Selection Study Public Draft	KCAG Technical Advisory Committee/KCAG staff	Public Meeting / Information	n/a	6/13/18
KART Station Site Selection Study Public Draft	KCAG Transportation Policy Committee/KCAG staff/Consultant MM	Public Meeting / Information	n/a	6/27/18
KART Station Site Selection Study – Authorization for Additional Services (extend scope of work & modify preliminary site plan)	KCAG Transportation Policy Committee/KCAG staff/Consultant MM	Public Meeting / Action	Approved	6/27/18
KART Station Site Selection Study Final	KCAG Technical Advisory Committee/KCAG staff	Public Meeting / Recommendation	Recommend Acceptance	7/11/18
KART Station Site Selection Study Final	KCAG Transportation Policy Committee/KCAG staff	Public Meeting / Action	Accepted	7/25/18

* Consultant Team – Mott MacDonald, QK Inc., VRPA Technologies Inc., EBM Design Group



ATTACHMENT K

Site Selection Study

KART Transit Station Site Selection Study available for download at
www.kartbus.org