

# Title VI Program Update

2022-2024





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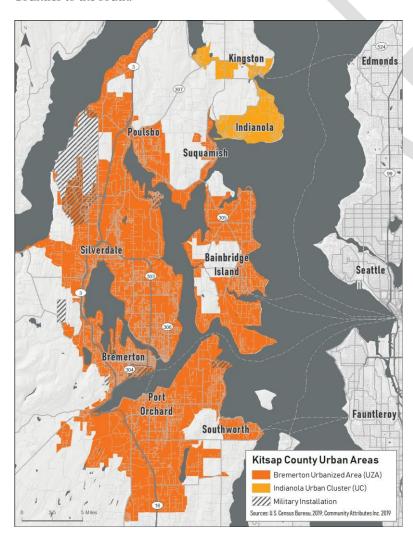
#### Chapter 1: Kitsap Transit

#### Introduction

On DATE, the Federal Transit Administration (FTA) approved Kitsap Transit's (KT) Title VI Program submission required pursuant to Title VI of the Civil Rights Act of 1964. FTA determined KT's Program met the requirements set out by FTA's Title VI Circular, 4702.1B. The next program due date is DATE.

#### Study Area

Kitsap Transit (KT) is located in Kitsap County, Washington. The people of Kitsap County are represented by three County Commissioners, and are served by a variety of agencies and government departments. Kitsap County occupies a unique portion of the State of Washington, directly between the urban areas of Seattle and Tacoma and the wilderness of the Olympic Mountains. It is bounded by the Hood Canal on the west, Puget Sound on the east, and Mason and Pierce Counties to the south.



Kitsap County is connected to the eastern native shore of Puget Sound by Washington State Ferries routes, including the Seattle-Bremerton Ferry, Southworth to West Seattle via Vashon Island, Bainbridge Island to Downtown Seattle, and Kingston to Edmonds, Washington.

The United States Navy is the largest employer in the county, with installations at Puget Sound Naval Shipyard, Naval Undersea Warfare Center Keyport, and Naval Base Kitsap (which comprises former NSB Bangor and NS Bremerton). The map on the left shows the two urban areas in Kitsap County, Bremerton UZA and the Indianola UC, the location of military presence and the connections across the Puget Sound to Seattle.

# **Background**

Kitsap Transit (KT) is a public transportation benefit area authority, authorized in Chapter 36.57A RCW, and located in Kitsap County, Washington. KT began providing public transportation services in early 1983. KT's system map appears in Appendix H, showing the extent of the agency's service area. Beginning in 2011, as the result of a change in state law, membership on the KT Board of Commissioners increased from nine to ten and now includes one non-voting member who represents the agency's labor unions. The nine voting members of the KT Board are the three Kitsap County Commissioners; the mayors (or an appointed Council Member) of the four incorporated cities in Kitsap County: Bainbridge Island, Bremerton, Port Orchard and Poulsbo; a member of the Bremerton City Council, appointed by the Bremerton City Council President; and one at-large member selected by the Board Chair from among interested elected officials from the four cities in the agency's service area. All board members serve for the duration of their elected term of office, with the exception of the Bremerton City Councilmember, who serves for a one year term, and the at-large member, who serves for a two-year term and is selected at the last meeting in December or the first meeting in January every other year.

Kitsap Transit's Marine Services Department operates passenger-only Fast Ferry services to Seattle from Bremerton, Kingston and Southworth. Increases in service hours, mileage and ridership forecasts can be attributed to the planned service improvements associated with new ferry services and the implementation of recommendations from the Long-Range Transit Plan (LRTP) and the Comprehensive Operational Analysis (COA).

Kitsap Transit provides fixed route service, ADA-accessible demand response service (ACCESS), VanLink, Worker/Driver service, vanpool service, general public dial-a-ride service, on-demand, foot ferry, and fast ferry service for parts of Kitsap County. Kitsap Transit's system map, in Appendix H, shows where Fixed Route service, Worker/Driver service, and Kitsap Transit Foot Ferry (KTFF) service is offered.

During the weekdays, route headways are typically one hour; service hours are from 4:15 a.m. to 9:25 p.m. During the AM and PM commute hours, several other routes are also added with the all-day routes to meet Washington State Ferries (WSF) at the Kingston, Bainbridge Island, Bremerton and Southworth terminals and Kitsap Transit's Fast Ferry service. Weekday Fast Ferry service is from 4:40 a.m. to 8:10 p.m. Weekday Port Orchard to Bremerton local ferry service hours are from 4:25 a.m. to 9:12 p.m.

On Saturdays during peak summer service, Kitsap Transit operates 20 fixed routes mostly on one-hour headways primarily between 10 a.m. and 5:30 p.m. Arterial and Fast Ferry connecting routes operate in the 8 a.m. – 8 p.m. window. The Port Orchard to Bremerton Foot Ferry operates Saturdays on the same weekday headway, every half hour with a shorter service window, except in the summer where it operates until midnight. Saturday Fast Ferry service is seasonal operating on a summer schedule.

Paratransit services operate throughout the County door-to-door during the same hours of operation as the fixed-route service. Taxi service is utilized to supplement the paratransit service. Ride services are a deviated response service either based on a passenger's phone call or a phone app that triggers the trip. Each ride service operates in a designated service area where there's a potential for future routed service.

Kitsap Transit also operates Vanpool and Worker Driver services. The Worker Driver services are effectively a bus-sized vanpool program operating to and from the largest employer in Kitsap County, Puget Sound Naval Shipyard.

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#### Chapter 2: Title VI

#### Purpose of the Title VI Program

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

This Title VI Program Report of KT is conducted in compliance with FTA Circular 4702.1B (10/1/12), to ensure that benefits and services provided by KT are distributed consistent with the provisions of Title VI.

# **Objectives**

#### The following are the objectives of Title VI:

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

The Title VI review of KT requires several separate processes to occur. First is the submission of the Title VI Program Report completed by KT. Second is FTA's evaluation of KT's compliance with the requirements of Title VI. Last is FTA's subsequent notification of findings, and the remedial actions which KT may be required to undertake. As a recipient of federal transportation capital funding, KT has prepared this Program Report in compliance with requirements of Title VI.

Kitsap Transit's Title VI Program update includes requirements for "Transit Providers that operate fixed route service" as defined by FTA Circular 4702.1B.

# Title VI Program Changes

Kitsap Transit's (KT) objective in the 2022 Title VI Program is to continue inclusive translated documentation and incorporate equity analysis for fare changes and major service changes. KT identified vital documents most beneficial to the public in the service area. The vital documents were translated or available upon request based on cost to translate and translated in both Spanish and Tagalog (see Page 14, Translated Documents). Rider Alerts for Quarterly Community Meetings, Special Meetings and limited media releases now include the language statement:

- For assistance with transportation to a meeting or for American Sign Language services, call 800.501.7433.
- Para la traducción de este documento al español, llame al 1-800-501-7433 durante el horario regular de oficina. El personal de servicio al cliente lo contactará a un intérprete.
- Para sa pagsasalin ng dokumentong ito sa Tagalog, mangyaring tawagan ang 1-800-501-7433 sa normal na oras ng trabaho. Ikokonekta ka ng kawani ng customer service sa isang tagapagsalin.

These documents are sent to the Agency Advocate mailing list for local agencies to display and provide additional public assistance.

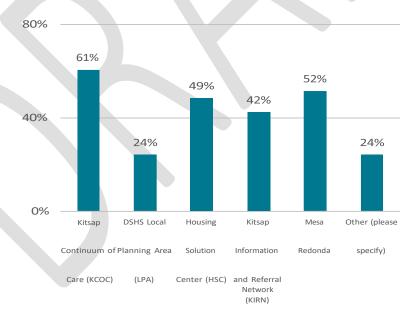
To ensure current and future buses and vessels received the translated documents and are compliant with the Title VI Program, packets have been created. Each vessel received a Title VI packet that contained the on-board fare information and language cards with graphics, on-board rider alerts, Title VI non-discrimination notices, and translation information cards including language line contact with translations in Spanish and Tagalog (see Appendix G, Title VI Packet).

An improved Title VI training module was implemented by the Kitsap Transit staff trainer. The training module includes an introduction to Title VI, LEP, and translated documentation with instructions on how to use the documentation and how it benefits riders. A short LEP video is also shown to provide beneficial examples from real life scenarios.

In 2012 Kitsap Transit formed "Agency Advocates for Low Income, Minority, and Limited English Proficiency (LEP) Populations", which was a quarterly meeting coordinated by Kitsap Transit to provide updates on KT's services and capital projects. The goal of this meeting was to reach Low Income, Minority, and LEP populations through the agencies that serve them. In recent years, attendance by community agency advocates had declined. In 2015, an average of six (6) community agency advocates attended each quarterly meeting. In 2016, an average of three (3) community agency advocates attended each quarterly meeting. Based on this decline in attendance, and in an effort to create the most effective and efficient partnership with community agencies that provide services for Low Income, Minority, and LEP populations, Kitsap Transit made the decision to utilize an alternative communication pathway to take the place of the Agency Advocates for Low Income, Minority, and LEP Populations meeting.

To determine the most effective and efficient communication pathway to take the place of this meeting, Kitsap Transit created a survey that was sent to all eighty-three (83) members of Kitsap Transit's Agency Advocates email group. The survey was also given out at meetings in the community attended by Kitsap Transit staff.

#### **Community Meetings Attended by Agency Advocates**



Thirty-three (33) community agency advocates participated in Kitsap Transit's Agency Low Income, Minority, and LEP Survey. We found that 100% of the survey participants or representatives of their agency attend established meetings in the community. The top three meetings attended are Kitsap Continuum of Care, Mesa Redonda, and Housing Solutions Center. The full results are shown in the figure below.

Based on these results Kitsap Transit concluded that the most effective and efficient communication pathway was to utilize established meetings in the community to interface with agencies that provide services to Low Income, Minority, and LEP Populations. Kitsap Transit will actively attend these meetings to share information about Kitsap Transit services and projects and to discuss effective communication methods for Low Income, Minority, and LEP outreach.

#### Chapter 3: Outreach Activities & Public Participation Plan

#### Overview

Kitsap Transit works to ensure all populations are included in the agency's decision-making process including minority, low-income and LEP populations. KT solicits broad participation through a variety of means. Included in this chapter is a summary of public outreach and involvement activities, those that are ongoing and those that have been undertaken since the last submission of the Title VI Program.

#### Limited English Proficient (LEP)

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

#### **Outreach Activities**

Kitsap Transit provides press releases about upcoming activities and meetings to the major media outlets serving the service area. The Kitsap Sun is designated as the official newspaper of KT for the purpose of publication of legal notices and dissemination of public information announcements. KT makes a special effort to contact organizations that serve special populations that may be affected.

Kitsap Transit keeps a list of interested and relevant persons and organizations, including those that serve minority, low income and LEP populations and contacts them regarding quarterly agency meetings and issues which may affect people that they serve. KT provides information about meetings and service changes in rider alerts available on the buses, ferries, website, at the customer service office and the Administrative Offices. KT also creates posters and cards to be displayed in buses, at transit centers, park and ride lots, at bus stops and at locations relevant to the issue being presented.

#### Kitsap Transit maintains a website, www.kitsaptransit.com. The website includes information on:

- Route maps and schedules
- Rider Alerts for notifications of route detours, snow routes and impacts on services
- Board of Commissioners meetings, sub-committee agendas and actions open to the public.
- Customer Comment Process
- Title VI considerations and Complaint Process
- ADA complementary service

- Notifications of public meetings regarding fare and/or service
- News and Events
- Available Employment Opportunities at Kitsap Transit
- •Learn How to Ride and the Benefits of Riding Transit

#### **Board & Committee Meetings**

Kitsap Transit's 10-member Board is comprised of nine elected officials and a non-voting member who represents the agency's labor unions, as required by state law. The Transit Board is a policy-making board. In addition to considering a variety of operational topics, ranging from bus purchases to software upgrades, it also deliberates on policy issues such as how much routed or ACCESS service the agency puts on the street. Board meetings are scheduled every month and are open to the public to the extent authorized by law. At each meeting a portion of the agenda is allotted for citizen communication.

#### **Public Hearings**

At public hearings KT provides opportunity for interested persons or agencies to give comments. Any interested persons may submit orally, or in writing, comments with respect to the issue being presented. If persons are not able to attend the public hearing they may submit comments via mail, comment phone line or email. KT also provides special assistance or materials in an accessible format upon request. Meeting locations are served by transit routes and KT offers rides if transit service is not available.

#### Soliciting Feedback

Kitsap Transit solicits feedback from the public by means of customer comment cards, the customer service phone line, public outreach tables, online, public hearings, a website comment line, and with periodic community surveys.

#### Fare and Service Changes

Kitsap Transit implements a public comment process whenever there is a proposed fare increase or a service reduction of more than 25% of daily revenue service hours on any route. Kitsap Transit may also implement this public participation policy for major route changes or other projects as deemed appropriate by the Service and Capital Development Director or the Executive Director.

Prior to a fare increase or a major service reduction, Kitsap Transit solicits comments from the public. In the case of a proposed fare increase, Kitsap Transit holds a series of public meetings around the county. In the case of a service reduction, the public meetings may be held in affected area(s). Consideration is given to using centrally located, transit-accessible facilities when appropriate for these public meetings. Public meetings are held during both the daytime hours and the evening hours to ensure maximum opportunity for people to participate. Kitsap Transit also makes every effort to accommodate persons with special needs and to include members of potentially underserved groups, including minority and low-income populations. Transportation and American Sign Language (ASL) services are available upon request if arranged prior to the public meeting. To publicize these public meetings, Kitsap Transit will provide a combination of:

- Post Notifications on social media, e-mail Agency Advocates, and post on the KT website
- Present information at the KT Board Meetings and sub-committee meetings

- Discuss all proposed changes with all Kitsap Transit Committees:
  - Citizens Advisory Committee (CAC)
  - Run Committee
  - Passenger Advisory Committee on Transportation for the disability community (PACT)
- · Place Rider Alerts on the affected bus routes, at park & ride lots, and transfer centers in affected areas
- Mail notification to all Kitsap Transit committee members and participants
- Place ads in the weekly newspapers of the affected area and in the daily newspaper
- · Place information on the Kitsap Transit website so that comments may be sent in via e-mail
- · Send out Rider Alerts on Kitsap Transit's subscription e-mail service for the affected routes
- Translate critical notification documents based upon languages indicated in Kitsap Transit's LEP Plan and indicated by demographic analysis of Kitsap Transit's service area
- Provide Spanish translation of public hearing and meeting notices and language that directs customer to the translation line.

Concurrent with public meetings, Kitsap Transit will post the materials to be presented on the Kitsap Transit website. The opportunity to comment is offered on-line. Comments made at the public meetings are recorded. Upon request, Kitsap Transit provides a translator for public meetings at which groups or individuals are present that have been identified as having Limited English Proficiency or a translator has been requested. All comments, whether made at the public meetings, via e-mail, regular mail or telephone are compiled and summarized. If deemed necessary by staff, adjustments may be suggested to the proposed change(s) based on the public comment. If the revisions are considered major, Kitsap Transit may hold additional public meetings and seek additional public comment, following the process described above.

#### **Public Participation Plan**

#### **Key Principles**

Kitsap Transit's Public Participation Plan has been prepared to ensure that no one is precluded from participating in KT's service and capital planning and development process. It ensures that:

- 1. Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- 2. The public's suggestions can and will influence KT's decision making;
- 3. The concerns of all participants involved will be considered in the decision-making process; and;
- 4. KT will seek out and facilitate the involvement of those potentially affected.

# **Goals and Objectives**

On an ongoing basis, Kitsap Transit engages the community regarding planning, service, and fares through several committees and public processes.

Kitsap Transit established the following committees:

- Citizens Advisory Committee (CAC)
- · Passenger Advisory Committee on Transportation for the disability community (PACT)
- Agency Advocates for LEP, Low Income, and Minority Populations

Kitsap Transit attends the following committees when available:

- Kitsap Continuum of Care (KCOC)
- Housing Solutions Center (HSC)
- Kitsap County Resource (KCR) Life Skills
- · Local Planning Area (LPA) DSHS
- KIRNS
- Mesa Redonda

# Citizens' Advisory Committee

Kitsap Transit's Citizens' Advisory Committee (CAC) meets monthly to give input to the agency's Transit Board. Since the general public is both the user and the financier of all transportation systems, we encourage the community to participate in identifying transportation issues and commenting on potential alternatives. The CAC consists of members representing all areas of the county: students, commuters, regular bus riders and senior citizens. CAC members apply for two-year appointments which are made by the Kitsap Transit Board of Commissioners. The CAC provides input in the following areas:

- Service suggestions
- · Usage of services what works and what needs modified or changed
- Quality of operations
- · Costs and fare-box return ratio
- Capital Project investment recommendations and suggestions
- Public information and marketing programs

# Passenger Advisory Committee on Transportation (PACT)

This public meeting is held for all ACCESS passengers and their families to get more information regarding ACCESS and major Kitsap Transit projects. There is no set roster and attendees vary. This meeting is held on the 2nd Tuesday of every other month at 2:00 p.m. at Kitsap Transit's Charleston Base, 200 Charleston Boulevard, Bremerton. Items of discussion are:

ACCESS services provided

- · Challenges related to service accessibility
- Who Kitsap Transit connects with
- Common customer challenges

• How to schedule a ride

Service statistics

# Limited English Proficiency, Low Income and Minority Participation

This committee met once a quarter from 2012 to 2017. In March 2017, Kitsap Transit began attending community meetings to review Kitsap Transits' services, projects, and to discuss effective communication methods for LEP and minority outreach. Service changes, issues, barriers, and fare information are frequently discussed.

#### The 2022 LEP, Low Income and Minority Roster (Agency Advocates) includes:

<ul> <li>Peninsula Community Health Servi</li> </ul>	ces
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- Goodwill
- Kitsap Mental Health
- Kitsap Recovery Center
- Kitsap Community Resources
- Catholic Community Resources/Benedict House
- South Kitsap Helpline
- · Olympic College
- Worksource (ESD)
- Kitsap Immigration Assistance Center
- Coffee Oasis

- Hospice
- North Kitsap Fishline
- Kitsap Public Health District
- Agape Unlimited
- · Department of Social and Health Services
- Kitsap Adult Center for Education
- Kitsap Transit
- Agape
- Kitsap Rescue Mission
- · Stand Up for Kids

# Other Kitsap Transit Participation

Kitsap Transit currently is active with other community groups and shares information with these groups as it relates to transportation issues. Participation is as follows; a detailed list of outreach events can be found in Appendix A.

- Kitsap Continuum of Care
- Kitsap County Developmental Disability Advisory Board
- · Various transit information events around the community

# Regional Partnership/Capital Programming

For its capital programming, including major facility and bus procurements, KT uses the Puget Sound Regional Council's (PSRC) adopted public participation plan, dated December, 2018. This plan clearly indicates that the Metropolitan Planning Organization's (MPO) public participation process satisfies the KT's public participation requirements for its Program of Projects. The notices for the regional Transportation Improvement Program (TIP) also state that the notice of public involvement activities and time established for public review of and comments on the TIP will satisfy FTA's program of projects requirement. The Transportation Improvement Program (TIP) implements the policy and investment priorities expressed by the public and adopted by PSRC in the Regional Transportation Plan (RTP). In this way, public comments made as part of the RTP are reflected in the TIP as well. The TIP covers a four year time frame,

and all projects included in the TIP must be consistent with the RTP. The TIP is a comprehensive listing of the region's surface transportation projects including transit, highway, local roadway, bicycle and pedestrian investments that receive federal or state funds, or are regionally significant, regardless of funding source, for federal and state air quality conformity purposes.

#### **Public Participation Process**

#### **LEP Threshold**

The 2020 census shows that Spanish and Tagalog1¹ continue to be the only languages meeting the LEP minimum of 1,000 speakers or 5% of the population, whichever is lowest. As a result, KT will translate vital headers into Spanish and Tagalog, identify critical documents, translate identified critical documents into Spanish and Tagalog or provide graphic-only alternatives, and work toward a more inclusive print translation.

Examples of written documents that will be translated include emergency messages and alerts, consent forms, complaint forms, notices of eligibility criteria, rights, denial, loss or decreases in fares, benefits or services, notices of availability of free language assistance and summary explanations of KT's direct services.

# Kitsap County Residents Who Speak English Less Than "Very Well"

2013, 2015, 2020 American Community Survey

	2013		2	015	2020		
Language	Number of People	Percent of County Total	Number of People	Percent of County Total	Number of People	Percent of County Total	
Spanish or Spanish Creole	2,677	1.12%	1,948	0.81%	1,859	0.73%	
Tagalog	1,599	0.67%	1,416	0.59%	1,722	0.68%	
Other Asian and Pacific Island languages	762	0.32%	645	0.27%	529	0.21%	
Chinese	262	0.11%	215	0.09%	409	0.16%	
Korean	304	0.13%	163	0.07%	289	0.11%	
Vietnamese	400	0.17%	385	0.16%	246	0.10%	
Other Indo-Euro languages	210	0.09%	243	0.10%	200	0.08%	
French	146	0.06%	123	0.05%	96	0.04%	
German	120	0.05%	106	0.04%	63	0.02%	
Slavic Languages	282	0.12%	192	0.08%	25	0.01%	
Other and unspecified languages	74	0.03%	157	0.07%	333	0.13%	

Source: American Community Survey, Table B16001, 2009-2013, 2011-2015, 2016-2020; Community Attributes, 2022.

The modern Tagalog language, spoken by people from the Philippines, exhibits a significant Spanish language influence with an estimated 40 percent of Tagalog vocabulary comprised of adopted Spanish words. KT has talked with several community organizations about the needs of the Tagalog-speaking population. The feedback received has been that Tagalog speakers use transit, but they speak English fluently because English is mandatory in the Philippines. The Tagalog-speaking LEP are therefore less reliant on translation and interpreting service. There was a general impression among the organizations that this group was getting its needs met and language was not a barrier. This finding was reinforced by the results of the on-board survey as well.

#### General Outreach Efforts (Alerting Riders and Encouraging Engagement)

The results of the new numerical threshold for what constitutes a significant LEP population has caused KT to modify its process for reviewing service and/or fare changes. This has prompted KT to expand its Public Participation Plan to include new outreach efforts. While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision making process using a service change as an example.

- 1. A service change proposal is developed internally or as a result of public comment;
- 2. An internal review by the appropriate committees is conducted;
- 3. The proposal, if significant, is reviewed by KT's Citizen Advisory Committee (CAC);
- 4. A Title VI review of the proposal is conducted to see whether minority or LEP persons might be disproportionally affected;
- 5. Public outreach avenues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the KT service area;
- 6. Public outreach materials are developed and distributed by mail, e-mail, online and through the LEP group;
- 7. The public comment period ends;
- 8. KT's *staff and appropriate committee members* review comments received and decides whether to modify the service change recommendation as a result;
- 9. The KT Board of Directors reviews the outcome of the public participation process along with staff recommendations;
- 10. If approved then planning for the implementation of the service change begins;
- 11. Outreach is conducted in advance of the service change via onboard rider alerts, transit station reader boards and on the website

#### Outreach Efforts (Spanish, Tagalog and English)

Kitsap Transit staff identified several "Vital Documents," that were translated or available to translate upon request in both Spanish and Tagalog. Documents that only include a header/footer statement in both Spanish and Tagalog are provided a phone number to contact Kitsap Transit for full translation. All documents are produced in English. Translated documents are marked with an S or a T if they are provided in Spanish or Tagalog.

- Title VI non-discrimination notices (to be posted in public places) (S&T) (Full Document)
- Title VI complaint form (available at transit stations, administrative building & website). (S&T) (Full Document)
- Translation services cards for drivers. (S&T) (Full Document)
- · On-board Non-English speaking fare information and language card with graphics . (S&T) (Full Document)
- ACCESS transportation eligibility determination letters (individualized) (Full Document)
- On-board rider alerts to provide riders with details of service changes and schedules of public meetings. (S&T) (Footer Only)
- Low Income Fare Eligibility Form. (S&T) (Full Document)
- ACCESS transportation riders' application form. (S&T) (Full Document)
- Translation information on website. (S&T) (Header/Footer Only)
- Direct mail groups or agencies representing citizens with limited English capabilities (language as needed for direct mail recipients) (Full or Header/Footer Only)
- Press Releases (Footer Only)

# Minority Representation in the Decision-Making Process

Minority Representation on Non-elected Planning Boards, Advisory Councils, Committees:

Kitsap Transit's Citizen's Advisory Committee (CAC) consists of members representing all areas of the county: students, commuters, regular bus riders and senior citizens. CAC members apply for two-year appointments which are made by the Kitsap Transit Board of Commissioners.

#### Citizens Advisory Committee (CAC)

Race	Number of People	% of CAC	% in Community
Caucasian	12	92%	76%
Latino	0	0%	8%
African American	1	8%	2%
Asian	0	0%	5%
Native American	0	0%	1%

The Run Committee is an internal staff planning group responsible for giving direction on routes, schedules and service related policies. No particular effort is made to ensure diversity on this committee. The diversity of the agency is naturally reflected in its membership.

#### **Run Committee**

Race	Number of People	% of RUN	% in Community
Caucasian	15	94%	76%
Latino	0	0%	8%
African American	0	0%	2%
Asian	0	0%	5%
Native American	0	0%	1%
Native Hawaiian or	1	6%	1%
Pacific Islander			

#### Chapter 4: Four Factor Analysis & Language Implementation Plan

#### Overview

The purpose of KT's Four Factor Analysis is to determine if Kitsap County has a significant population of Limited English Proficiency (LEP) residents. It includes LEP threshold data from the 2015 census. The Language Implementation Plan describes how KT will ensure meaningful access to benefits, services, information, and other important portions of programs and activities for LEP individuals.

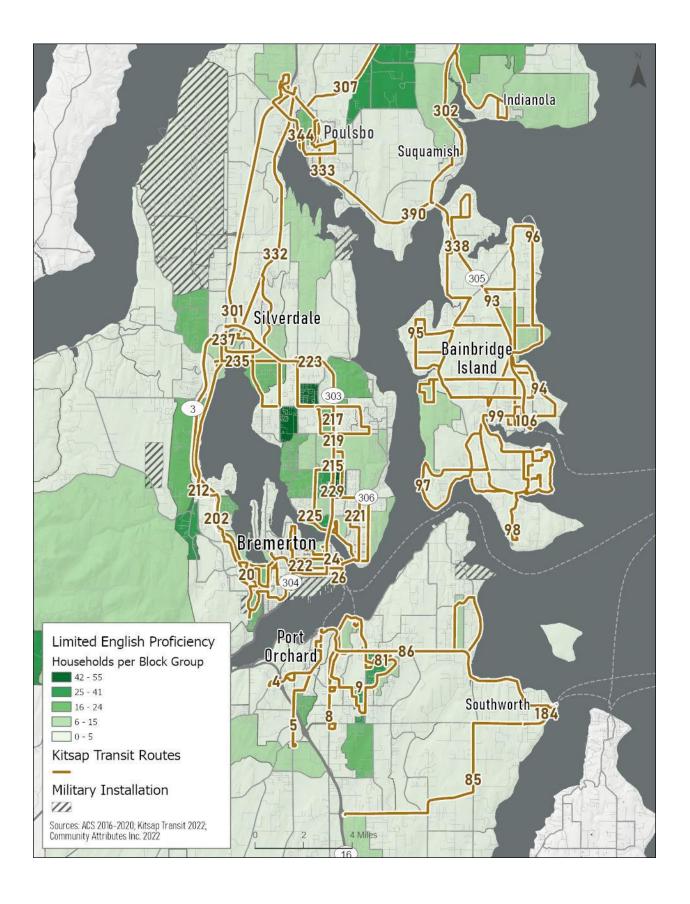
KT's service area includes all of Kitsap County. The main sources used by KT for this analysis are:

• US Census American Community Survey 5 Year Estimates, Kitsap County Residents who speak English less than "very well", 2016-2020

In addition to Census data, the following sources were used:

- Online Survey of Kitsap Transit riders (March-April 2022)
- Staff Survey (January 2019)
- LEP Outreach Questionnaire to Organizations (January 2019)

To illustrate the concentrations of LEP persons within the service area, KT developed the following map using census data. As the map shows, the highest concentrations of LEP households are in unincorporated and rural areas to the north of Bremerton and north-east of Poulsbo.



#### Four Factor Analysis

#### 1. Number or proportion of LEP persons eligible or likely to be encountered by a program.

#### **On-Board Survey**

Kitsap Transit undertook an online community survey of all riders in March and April 2022. The survey was offered in English, Spanish and Tagalog. Questions focused on customer demographics including proficiency with English as well as travel behavior. KT received 1,786 responses from across its service area.

# **Survey Results**

The survey showed the majority of KT ridership speaks English at home. Most survey respondents took the survey in English, though Spanish and Tagalog options were also available. The adjacent table shows the proportions of riders who self-identified the language spoken at home.

# Staff Survey

Kitsap Transit undertook a survey of all staff members in January 2019. Those who have significant interaction with the general public were the ones who tended to respond, including Customer Service Representatives, Bus Operators, and Supervisors. We surveyed 300 employees and received 156 responses, though not everyone responded to every question. A summary of survey responses is included below.

# **Survey Results**

Have you transported customers or spoke to customers (in person or by phone) who appeared to speak English less than very well, not well or not at all? Could you determine what language(s) the customers might be speaking? (see table to the right)

Language Spoken	Percent of
at Home	Ridership
English	97%
Spanish	1%
Tagalog	1%
Korean	0.2%
Chinese	0.2%
Russian	0.1%
Other	1%

Language	Number of
Encountered	Respondents
Spanish	52
Tagalog	19
Uncertain	17
Filipino	6
Chinese	5
Japanese	3
Korean	3
French	2
Hindi	2
American Sign Language	2
Russian	1
Arabic	1
Kurdish	1
Serbo-Croatian	1
Farsi	1
Italian	1
Chamorro	1
German	1
Scottish	1

Do you know of or belong to any groups that may have participants who might need English language interpre-	Language	Number Stating "Yes"	Department(s)
• American Sign Language (ASL), Kitsap County	Spanish	6	Routed Operations, HR, ACCESS, Services & Capital Development, Marine Services - Kingston Route
Deaf Community	Tagalog	1	ACCESS
Additional groups named in the 2016 Staff Survey:	Chinese	1	Finance
• Many Languages, Title VI Agency Advocates	French	2	ACCESS, Marine Services - Kingston Route
• Tagalog, Tamarack Apartments	ASL	2	CSO, ACCESS
88,	Kurdish	1	Facilities
	Serbo-Croatian	1	Marine Services - Kingston Route
Do you speak any languages besides English? If so,	Italian	1	Services & Capital Development
would you be willing to assist Kitsap Transit with	German	1	ACCESS

# LEP Outreach Questionnaire

translation services? (see table at right)

In 2019, Kitsap Transit (KT) sent out a questionnaire to ten (10) local organizations that served LEP persons asking what their transportation needs were and how well KT was meeting those needs. Follow up phone calls were conducted with most of the organizations. Key organizations and their responses are summarized in the table below.

# Results of LEP Outreach Questionnaire

Organization	Type	Participants	LEP	Non English Languages	Transportation Needs	Comments
Bremerton School District	School	5,000	400	Spanish, Mam	Need one on one assistance.	Best communication is done through testing and phones.
Kitsap Regional Library	Library	200 or more	20 - 30%	Spanish	Bus Service near home or employment	
DSHS/ Bremerton CSO	Social Services	200 or more	0 - 5%	Spanish	Illiteracy, Low Income, service not available near their home or employer and/or don't understand transit.	Schedules in other languages, translators available, information about low income fares, services to remote parts of county

Organization	Type	Participants	LEP	Non English Languages	Transportation Needs	Comments
Kitsap County Aging and Long Term Care	Social Services	200 or more	23	Tagalog, Spanish, Vietnamese, Farsi	Rural access and Sunday and after hours transportation service options.	Utilization of volunteer, advisory council members, and staff in community outreach activities. Community meetings, activities or events and word of mouth are helpful strategies.
Kitsap Rescue Mission	Social Services for Homeless	477	5	Spanish	Daily accessible transportation services.	Outreach, fliers, social media. The best communication tool for our LEP group is material translated.
Kitsap Public Health District	Public Health Agency	200 or more	40 - 50%	Spanish, Mam	Individual assistance to understand transportation services and availability near home or employer. Illiteracy (can not read English or their native written language), poverty and service may not be available near their home or employer.	Provide transit training in other languages.
Helpline House	Socal Services	500	75	Spanish, Tagalog, French	Assistance with available transit services.	Online presence.
Housing Resource Bainbridge	Housing	600+	20+	Spanish, French (African), Korean, Tagalog		We advertise that we have a Spanish-speaker on staff and that translators for other languages are available upon request.

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

Though the number of LEP persons who have trouble riding KT is not high (based on feedback from the LEP Outreach Survey), there is daily interaction between KT staff and members of the Spanish speaking and Tagalog speaking communities who do not speak English well. Less frequent interaction is had with Chinese, Japanese, Korean, and Russian speaking persons. Based on comments from the KT staff survey, they are willing and able to communicate effectively with LEP persons who speak Spanish or Tagalog.

#### 3. The importance of programs provided by KT to LEP persons

Kitsap Transit's most critical services are the service on the street (both fixed route and ACCESS Transportation). In order to use KT's services, people must have access to the fixed route routes and schedules and to ACCESS Transportation eligibility and application procedures.

Most of KT's bus routes are timed with a 5-10 minute window for transfers. If an LEP person is unable to understand what bus they need, and help from a staff member takes too long or is not adequate, then missing the transfer is highly likely. This could cause an individual to be late for important activities (work, school, meetings, etc.).

For ACCESS Transportation, where policies and procedures are more complicated than fixed route, the need for adequate access to information is important. Delays in the provision of LEP service can affect access to medical and social services.

Though KT's community outreach efforts didn't suggest a problem in the availability of KT information for LEP persons, there are improvements we can make to lessen the chance of problems occurring.

#### 4. The resources available and cost to the organization

The following is a list of existing LEP resources, and those in the process of being implemented by KT.

# Language Implementation Plan

#### **Ongoing Items**

- Train frontline and other key staff on:
  - -Awareness of type of language services available
  - -How staff and/or LEP customers can obtain these services
  - -How to respond to LEP callers
  - -How to respond to correspondence from LEPs
  - -How to respond to LEPs in person
  - -How to document LEP needs
- Continue to provide telephone interpretation for basic transit questions and trip planning assistance using Language Line Services.
- Identify routes serving areas with high concentrations of LEP individuals using 2016-2020 American Community Survey census data. (please see map on page 17)
- Continue to provide education, training, and tools for social service providers.
- Continue to provide diversity awareness training to employees.
- Continue partnerships and work closely with community organizations that serve LEP populations.
- Ensure that "Non-English" language cards remain available for Operators, Customer Service Representatives and Supervisors.
- Continue providing use of in-person interpreter services, for public meetings upon request..
- Continue to track and record use of language services.
- Routinely assess whether existing language services are meeting the needs of LEP customers. (ex. Tracking language line usage).

- Seek feedback from LEP organizations and customers on KT's Language Implementation Plan.
- Maintain list of KT bilingual staff.
- Provide copies of the most commonly asked transit questions in Spanish and Tagalog for Customer Service Representatives and Operators.
- Put language line link, as well as deaf and hard of hearing services on Kitsap Transit's website.
- Create signage in multiple languages informing LEP clients about the telephone language line and post in key locations.
- Continue to identify critical documents for translation and work towards a more inclusive print translation.
- Printed Materials
  - -Have all primary public information printed materials translated to Spanish and critical documents translated into Tagalog as well.
- Website
  - -Have a section on KT's website that offers translation assistance and critical documents available in Spanish and Tagalog
- Increase the visibility of Title VI nondiscrimination statements available at transit centers and administrative office Include Tagalog on signage as new interior cards are ordered.

#### **Chapter 5:** Tracking & Investigating Complaints

#### Overview

In order to comply with 49 CFR Section 21.9(b) KT needs to have procedures for investigating and tracking Title VI complaints filed against them and have the procedures for filing a complaint available to members of the public.

#### **Procedures**

Kitsap Transit has procedures for investigating and tracking Title VI complaints filed against it. The procedure for filing a complaint is available to members of the public upon request as is the Title VI complaint form. The procedure under Title VI of the Civil Rights Act of 1964 outlines KT's procedure for tracking and investigating Title VI complaints.

# Title VI Complaint Procedures

Any person who believes himself or any specific class of persons to be subjected to discrimination prohibited by Title VI may by himself or by a representative file a written complaint with Kitsap Transit. A complaint must be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by Kitsap Transit.

Once a Title VI complaint has been reviewed and accepted by Kitsap Transit, the Human Resources Director, or designee, will evaluate it, possibly in conjunction with Kitsap Transit's legal counsel. The complainant will receive an acknowledgement letter either informing him/her that an investigation will commence and/or requesting additional information.

Kitsap Transit will make a prompt investigation whenever a compliance review, report, complaint or any other information indicates a possible failure to comply with Title VI. After the investigator reviews the complaint, she/he will issue a letter of finding (LOF) to the complainant: The LOF will either state that Kitsap Transit did not find a violation and provide information about the right to appeal, or will indicate that a violation was found and provide a description of the proposed remedies. If the complainant wishes to appeal the decision, she/he has 60 days after the date of LOF to do so.

If an appeal is denied, a person may also file a complaint directly with the Federal Transit Administration, Attn: Civil Rights Officer, Jackson Federal Building, 915 Second Avenue Suite 3142, Seattle, Washington. 98174. (See Appendix E for the full complaint procedure)

# Title VI Complaint Form

	Tracking Number:	
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# Title VI Complaint Form

It is the policy of Kitsap Transit to assure that no person shall, on the grounds of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or otherwise be discriminated against under any of its federally funded programs and activities. Any person who believes his or her Title VI protection has been violated may file a complaint with Kitsap Transit's Human Resources department.

For Title VI complaints and additional information, please call (360) 478-6227.

1. Complainant's Name:			
2. Address:			
3. City:			
4. Telephone Number (Home):		(Business):	
5. Person discriminated against (if	f someone other than th	e complainant):	
Name:			
Address:	7		
City:	State:	Zip Code:	

6. Which of the following best describe because of your:	s the reason you believe the d	iscrimination took place? Was it
a. Race: □		
b. Color: □		
c. National Origin:		
7. What date did the alleged discrimina	tion take place?	
8. In your own words, describe the alleg believe was responsible. Please use the		
9. Have you filed this complaint with a state court?	ny other federal, state, or local	l agency or with any federal or
Yes □ No □		
If yes, check each box that applies:		
Federal Agency	Federal Court	State Agency
State Court □	Local Agency	

10. Please provide information	about a contact person at the a	agency/court where the complaint was filed.
Name:		
Address:		
City:	State:	Zip Code:
Telephone Number:		
to your complaint.		or other information that you think is relevant
Complainant's Signature	DO NOT WRITE BELOW T	Date This I his
		HIS LINE
	(Kitsap Transit Use O	nly)
Date Received:	Received By:	
To: Department Director:		
		me & Title)
Date:		

Assigned Investigator:	
Investigation Start Da	ate:
Investigation Comple	etion Date:
Complainant Notified On:	
Ву:	☐ Telephone
	☐ Personal E-mail
	☐ Certified Mail
	☐ Regular Mail
	☐ In Person
	COMMENTS

# Chapter 6: Investigations, Lawsuits, or Complaints

#### Overview

In order to comply with 49 CFR Section 21.9(b), Kitsap Transit (KT) shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming KT that allege discrimination on the basis of race, color, or national origin. The list shall include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by KT in response to the investigation, lawsuit, or complaint.

# List of Investigations, Lawsuits, or Complaints

Kitsap Transit's list of Title VI complaints and lawsuits since the last submission is included as follows:

Complaint #	Date	<b>Protected Class</b>	Status	Comments
39885	June 2017	Race	Closed	No Response from Claimant
41378	February 2018	Race	Closed	No Response from Claimant
42184	July 2018	Race	Closed	No Response from Claimant
43065	December 2018	Race	Closed	No Response from Claimant
43581	March 2019	Color	Closed	No Response from Claimant
42843	May 2019	Race	Closed	No Response from Claimant
44150	June 2019	Color	Closed	No Response from Claimant
47435	June 2021	Race/Color	Closed	No Response from Claimant
47750	September 2021	Race	Closed	No Response from Claimant
47889	October 2021	Race	Closed	No Response from Claimant

#### Chapter 7: Notice to the Public

#### Overview

In order to comply with Title VI 49 CFR Section 21.9(d), KT shall provide information to the public regarding the agencies Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. The notice is provided in English, Spanish, and Tagalog.

#### Kitsap Transit Title VI Notice to the Public

It is the policy of Kitsap Transit to assure that no person shall, on the grounds of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or otherwise be discriminated against under any of its federally funded programs and activities. Any person who believes his or her Title VI protection has been violated may file a complaint with Kitsap Transit's Human Resources Director by calling (360) 478-6227.

Es política de Kitsap Transit asegurar que ninguna persona, por motivos de raza, color o nacionalidad de origen, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964, sea excluida de la participación en, se le nieguen los beneficios de, o de otra manera sea discriminada en virtud de cualquiera de sus programas y actividades financiados por el gobierno federal. Cualquier persona que crea que su protección de Título VI ha sido violada, puede presentar una queja ante el departamento de Recursos Humanos de Kitsap Transit. Para quejas sobre el Título VI e información adicional, llame al (360) 377-2877.

Patakaran ng Kitsap Transit na tiyakin na walang sinuman, sa batayan ng lahi, kulay o bansang pinagmulan, tulad ng nakasaad sa Titulo VI ng Batas ng mga Karapatan bilang Mamamayan ng 1964 (Title VI of the Civil Rights Act of 1964), ang hindi isasama sa pakikilahok sa, ang tatanggihan ng benepisyo ng, o di kaya'y didiskriminahin sa ilalim ng anumang mga programa at aktibidades na pinondohan ng pederal. Sinumang naniniwala na ang kanyang proteksyon sa ilalim ng Titulo VI ay nilabag ay maaaring magsampa ng reklamo sa Human Resources Department ng Kitsap Transit. Para sa mga reklamo na may kaugnayan sa Titulo VI at karagdagang impormasyon, mangyaring tawagan ang numerong: (360) 377-2877.

#### List of Places Where Notice is Posted

- Kitsap Transit Website
- ${}^{\bullet}$  Kitsap Transit Customer Service Office (CSO), Harborside, and Charleston
- Kitsap Transit Buses
- Kitsap Transit Ferries

#### Chapter 8: List of Recent Construction Projects (2016–2022)

#### Wheaton Way Transit Center

In 2017, federal funds were used to plan and design a new East Bremerton bus transit center and park and ride facility. The project completed construction and was funded through the Washington State Regional Mobility Grant Program. Title VI Environmental Justice Analysis was included in the NEPA process and the project received Documented Categorical Exclusion from FTA.

#### Annapolis Ferry Dock Upgrade

In 2018, federal funds were used to design and construct a new floating dock for the Annapolis Ferry Terminal. The project completed construction and was funded by the 5307(h) Passenger Ferry Grant Program. Title VI Environmental Justice Analysis was included in the NEPA process and the project received Documented Categorical Exclusion from FTA

#### **Bremerton Dock Improvements**

In 2019, federal funds were used to design and construct dock modifications for the Bremerton Ferry Terminal. The project completed construction and was funded by the 5307(h) Passenger Ferry Grant Program. Title VI Environmental Justice Analysis was included in the NEPA process and the project received Categorical Exclusion from FTA

#### Chapter 9: Vehicle Assignment

Bus assignment for fixed routes is based on maximum daily passenger loads. KT's fixed route fleet includes a total of 81 buses ranging from larger 35-40' buses to smaller 24-27' buses.

High ridership routes are assigned the larger buses while lower ridership routes (typically ones that serve rural or less populated areas) are assigned the smaller buses. In terms of fleet age, the larger buses are older (~10 years old). The smaller buses are newer (3-5 years old).

#### Chapter 10: Fixed Route Service Standards

# Vehicle Load Standards (max. passengers on board / # of seats)

Service Type	Adequate	Optimal
High ridership urban service on segments of <10 mins.	<= 1,50	<= 1.50
Other Urban Service	<= 1.50	<= 1.50
Rural Intercity (trips >10 mins.)	<= 1.25	<= 1.00

# Service Headway Minimum Standards (minutes between buses)

Service Type	Peak Hour	Non-Peak	Evening	Saturday
High Frequency Corridors	60	60	60	60
Other Urban Service	60	60	60	60
Rural Service	60		n/a	

<sup>&#</sup>x27;n/a' indicates that there is no service provided

#### On-Time Performance Standard (% of buses arriving at a transit station within 5 minutes of posted schedule)

Time of Day	Min. %
AM Peak	95%
Mid-Day	95%
PM Peak	90%

#### Service Availability (maximum average distance between stops)

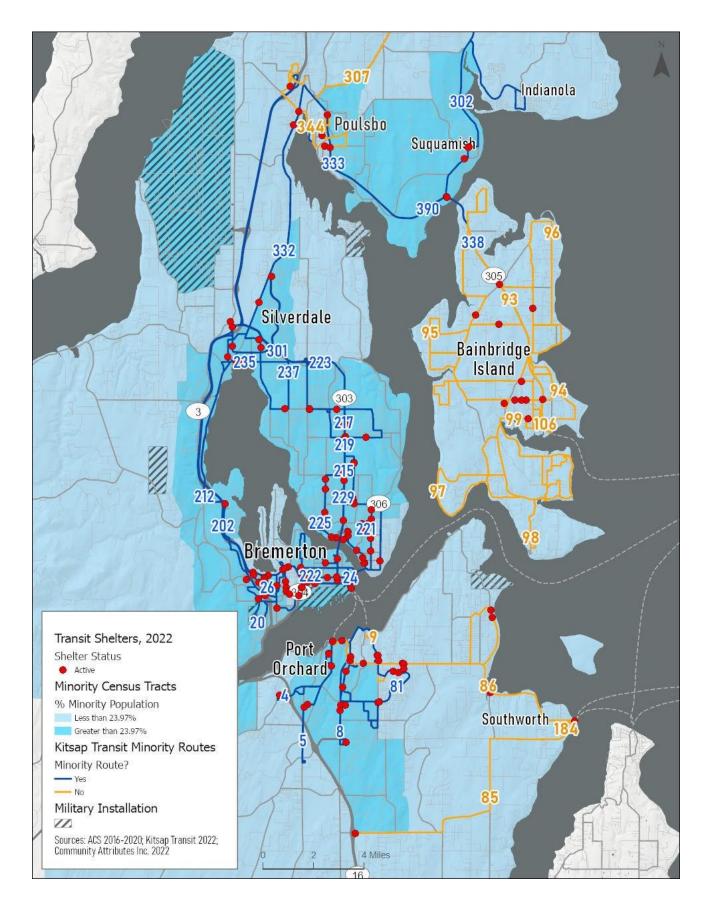
Route Type	Distance Between Stops
Urban	1/4 mile
Rural	1 mile

<sup>&#</sup>x27;...' indicates that service levels are determined on a case by case basis

# Chapter 11: Transit Amenities by Census Tract, 2022

Transit amenities by census tract are summarized in the table below and illustrated in the map that follows.

Census Tract	Minority/ Non-Minority	Total Shelters	Census Tract	Minority/ Non-Minority	Total Shelters
801.01	Minority	3	912.05	Minority	0
801.02	Minority	4	912.06	Minority	2
802	Minority	8	913.01	Non-Minority	0
803	Minority	12	913.02	Non-Minority	0
804	Non-Minority	3	914	Minority	0
805	Minority	3	915	Minority	1
806	Minority	3	916	Minority	4
807	Non-Minority	1	917.01	Minority	0
808	Minority	1	917.02	Minority	3
809	Minority	4	918	Minority	4
810	Minority	10	919	Minority	2
811	Non-Minority	9	920	Non-Minority	0
812	Minority	3	921.01	Non-Minority	2
814	Minority	1	921.02	Minority	0
901.01	Non-Minority	0	922	Minority	8
901.02	Non-Minority	9	923	Minority	6
902.01	Non-Minority	1	924	Non-Minority	5
902.02	Non-Minority	O	925	Non-Minority	8
903	Minority	0	926	Non-Minority	2
904	Non-Minority	3	927.01	Non-Minority	0
905.01	Non-Minority	5	927.04	Non-Minority	2
905.02	Minority	1	928.01	Minority	1
907	Non-Minority	1	928.02	Non-Minority	1
908	Non-Minority	3	928.03	Non-Minority	0
909.01	Non-Minority	4	929.01	Non-Minority	0
909.02	Non-Minority	3	929.02	Non-Minority	0
910.01	Non-Minority	1	9400	Non-Minority	0
910.02	Non-Minority	0	9401	Minority	5
911	Non-Minority	0	9901	Non-Minority	0
912.01	Minority	5	9901	Non-Minority	0
			Total M	inority	97
			Total No	on-Minority	63
			TOTAL		160



#### Chapter 12: Service Monitoring

#### Overview

Part of Kitsap Transit's compliance with FTA Circular 4702.1B is ongoing performance monitoring of the transit system relative to Kitsap Transit's system-wide service standards and service policies not less than every three years.

# **Route Sampling**

To implement a monitoring procedure, Kitsap Transit identified each route as either minority/non-minority using GIS mapping and 2016-2020 ACS data at the census tract level. Census tracts in which the percentage of minorities exceeded the Kitsap County average (23.97% currently) were designated as minority census tracts. Routes where at least one-third of the revenue miles passed through or adjacent to minority census tracts were designated "minority route". Kitsap Transit minority routes are shown on the map found on page 33.

Kitsap Transit will select a sample of minority and non-minority routes. The sample shall include routes that provide service to predominantly minority areas and non-minority areas. The selection of routes to be included in the sample for the service monitoring analysis will be based on the following factors:

- Routes selected represent all geographical areas of Kitsap Transit's service area
- Routes selected serve census tracts with both higher and lower concentrations of minorities, allowing a basis for comparison between minority and non-minority routes
- Routes selected provide a mix of frequent and basic service, designating higher and lower levels of frequency.

# **Analysis Methodology**

Consistent with FTA guidance the performance standards compared in this analysis are meant to ensure transit services and amenities are equitably distributed throughout the system. This entails an analysis of vehicle load, service headway, on-time performance, service availability, vehicle assignment, and distribution of transit amenities. Kitsap Transit will assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies. For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the standard measured, the transit provider shall analyze why the discrepancies exist, and take steps to reduce the potential effects. Where service metrics on routes serving minority populations perform lower than non-minority routes, strategies are identified for improving performance.

#### Chapter 13: Fare Change & Major Service Change, Disparate Impacts and Disproportionate Burden Policies

#### Overview

Transit providers who operate 50 or more fixed route vehicles in peak service and are in an urbanized area (UZA) of 200,000 or more in population are required to meet all requirements in Chapter VI of the FTA's Circular 4702.1B, including evaluating fare and service changes during the planning and programming stages. To comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7), and Appendix C to 49 CFR part 21, recipients shall develop written procedures to "evaluate, prior to implementation, any and all service changes that exceed the transit provider's major service change threshold, as well as all fare changes, to determine whether those changes will have a discriminatory impact based on race, color, or national origin."

# Fare Change & Major Service Change Policy

When planning fare changes or major service changes, Kitsap Transit will consider if any adverse effect would occur because of the fare change or major service change. Kitsap Transit will consider the degree of adverse effects (if any), analyze those effects, and discuss any necessary minimization and/or mitigation that need to be considered because of the proposed fare change or major service change. This section establishes policies for conducting equity analyses of major service changes and fare changes impacting minority and low-income populations.

The FTA requires transit providers to develop guidelines and thresholds for what it considers a "major" service change. Title VI of the Civil Rights Act of 1964 requires that Kitsap Transit evaluate the impacts of service changes that are deemed as major service change on minority and low-income populations. The following defines when a change in the transit service at Kitsap Transit is considered a major service change and will trigger a service equity analysis in accordance with the regulatory requirements set forth in FTA Circular 4702.1B (unless otherwise noted under "Exemptions"):

• When revenue miles or hours on any route increase or decrease by 25% or more when compared to the previous fiscal year.

#### Exemptions

- The major service change thresholds exclude any changes to service that are caused by the following:
- Temporary or Demonstration Services The initiation or discontinuance of a temporary transit service or demonstration service that will be or has been in effect for less than one year.
- Promotional Fares that will be or have been in effect for a maximum of twelve months.
- Natural or Catastrophic Disasters Forces of nature such as earthquakes, wildfires, pandemic, or other natural disasters or human-caused catastrophic disasters that may force the suspension of transit service for public safety or technical events.

- Temporary Route Detours A short-term change to a route caused by road construction, routine road maintenance, road closures, emergency road conditions, fiscal crisis, civil demonstrations, or any uncontrollable circumstance, less than one year.
- When a segment of one route is moved to another route but the route miles or hours do not change by 25%.
- Renaming a route or replacing it with an equal service.

# **Adverse Affects**

Kitsap Transit will analyze all major service change proposals to measure and compare the level of adverse effect (loss) or benefit (gain) between minority and non-minority populations and between low-income and non-low-income populations. The adverse effect is measured by the change between the existing and proposed service levels that would be deemed significant. Changes in service that have an adverse effect and that may result in a disparate impact include reductions in service (e.g., elimination of route, short lining a route, rerouting an existing route, increase in headways). Elimination of a route will likely have a greater adverse impact than a reduced frequency (headway change) in service. Kitsap Transit will consider the degree of adverse effects, and analyze those effects, when planning their service changes.

#### **Disparate Impact Policy**

A disparate impact occurs when a fare change or major service change results in adverse effects that are significantly greater for minority populations than for non-minority populations. For the purposes of this policy, minority population means any readily identifiable group of minority persons who live in geographic proximity and in residential land use areas within Census tracts where the percentage of minority persons is higher than the Kitsap Transit service area average. Minority census tracts in Kitsap Transit's service area are shown on the map found on page 32.

When conducting service and fare equity analysis, the following threshold will be used by Kitsap Transit to determine when a fare change or major service change would have a disparate impact on minority populations.

• A disparate impact occurs if a proposed fare or major service change requires a minority population to bear adverse effects by twenty percent (20%) or more than the adverse effects borne by the non-minority population.

# Disproportionate Burden Policy

A disproportionate burden occurs when a fare change or major service change results in adverse effects that are significantly greater for low-income populations than for non-low-income populations. For the purposes of this policy, a household earning less than 200% of the federal poverty level is considered low income. Low-income census tracts in Kitsap Transit's service area are shown on the map found on page 38.

When conducting service and fare equity analysis, the following threshold will be used by Kitsap Transit to determine when a fare change or major service change would have a disproportionate burden on low-income populations.

• A disproportionate burden occurs if a proposed fare or major service change requires a low-income population to bear adverse effects by twenty percent (20%) or more than the adverse effects borne by the non-low-income population.

# **Public Participatory Procedures**

For all proposed fare changes and major service changes, Kitsap Transit will implement the public participatory procedures described in the agency's Outreach Activities & Public Participation Plan under "Fare and Service Changes" section on page 9. These procedures are in line with Kitsap Transit's Public Comment Process Policy adopted in 2006 through Resolution 12-30 included in Appendix I.

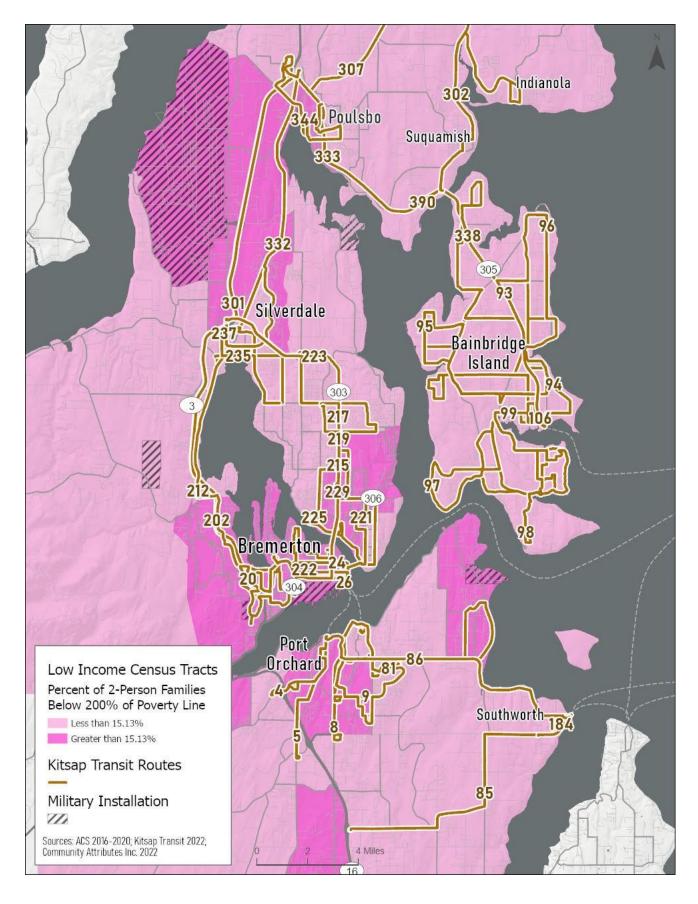
As part of Kitsap Transit's public involvement process, the transit agency uses varied tools to encourage, facilitate, and engage the public in dialogue and activities. Methods of outreach are tailored to engage a diverse population. Kitsap Transit is mindful in identifying and including in this process minority and low-income participants, people with limited English proficiency, and people with disabilities. The transit agency provides meaningful access to outreach activities by making available the service of translators and providing materials in appropriate languages, adapting a wide range of media communications to advertise and increase public participation. Detailed methods and commitments are available in the Public Participation Plan and the Language Assistance Plan.

#### **Analysis Framework and Assessing Impacts**

Kitsap Transit will document the dataset(s) used in the fare or service equity analysis, the techniques and/or technologies used to collect the data, and the analytical methodology followed to determine whether the proposed change(s) would impact minority and low-income populations. Kitsap Transit will use the adverse effects definition and disparate impact and disproportionate burden policies established in this chapter and compare the proportion of minorities/low-income persons adversely affected to the proportion of non-minorities/non-low-income persons adversely affected.

If Kitsap Transit determines a disparate impact or a disproportionate burden exists, the transit agency will take steps to avoid, minimize or mitigate impacts then re-analyze the modified service plan to determine whether the impacts were avoided, minimized, or mitigated. Kitsap Transit will also describe alternatives available to low-income passengers affected by the fare and service changes.

If Kitsap Transit determines that a disparate impact exists and decides to make the service changes despite these impacts, the transit agency will clearly demonstrate that it has a substantial legitimate justification for the proposed changes and clearly demonstrate that it analyzed alternatives to determine whether the proposed changes are the least discriminatory alternative.



# **Appendix A:** Kitsap Transit Outreach Events

Type of Meeting	# of Meetings Held	Topics of Discussion
Quarterly Community Meetings	24	Cross-Sound Ferry Service Approved, Cross-Sound Ferry Service Plan: Boats, Funding and Rider communications, Long Range Transit Plan, Wheaton Way Transit Center update, Silverdale Transit Center, Pas- senger-Only Ferry Update, North End Service Changes, and Long Range Transit Plan
KT Board of Commissioners Meeting	14	Cross-Sound Passenger-Only Ferry Implementation, Grant Opportunities, Financial Report, Capital Budget, Fuel Cost, Progress Reports, Golder Associates for Wake Research, ESMS Audit Presentation, North Base update, System Perfomance Report, Work Study Session: 2017 Budget Presentation, Washington State Legislative Agenda (WSTA), Next Generation ORCA, North End Service Changes, Sistership Design Update, Electric Bus purchase, Passenger Amenities at Transfer Centers, Solar Panel Pilot Project Update. Passenger-Only Ferry Implementation Work Plan, Transfer Policy Briefing, Gateway Center/Park & Ride, and East Bremerton Shared Use Path
Citizens Advisory Committee (CAC)	11	2016-2021 Transit Development Plan, Autonomous Vehicle Pilot Program, Solar Panel Pilot Project, System Performance Report, Finacial Report, Mid-Year Budget Amendments, 2016-2023 Long Range Transit Plan, 2015 ACCESS Customer Service Survey, Member Renewal, SK Ride, ESMS Update, North End Service Changes, Sistership Design Update, Electric Bus Purchase, Passenger Amenities at Transfer Centers, Cross-Sound Passenger-Only Ferry, System Review Consultant, Silverdale Transfer Center, Driver Shortages, Ridership Campaign, Operating and Capital Budgets, Free Fare Ticket Program, Wheaton Way Transit Center, and North Base Project Video
Passenger Advisory Committee on Transportation (PACT)	4	New Access vans, The Older American Conference, Same Day Transportation, ACCESS additional Propane Buses, SK ride update, Facebook contest, Community Events, Van Link Follow up, Accessibility with New Vehicles, and Upcoming Public Meeting regarding Fast Ferry information.
Community Outreach/Public Meetings	19	2016-2021 Transit Development Plan, KT's Cross Sound Fast-Ferry Proposition, Long Range Transit Plan, Changes coming to North Kitsap, new proposed Wheaton Way Transit Center, Wheaton Way Transfer Center, Title VI-Four Factor Analysis, Transit Development Plan, Connection With Riders: Kitsap Transit Passenger Only Ferry, Translated Documents, Silverdale Transfer Center, Quarterly Meetings, Be Transported Campaign, KT Services, ORCA cards, Low income eligibility, outreach events, New North Viking Transfer Center, North End Route Changes, Proposition 1 (KT Fast Ferry Proposition) approved by voters, Cross-Sound Ferry Service Plan: Boats, Funding and Rider communications, and Long Range Transit Plan

Type of Meeting	# of Meetings Held	<b>Topics of Discussion</b>
Notice of Public Hearing	6 Meetings/ 2 Hearing	Cross-Sound Passenger-Only Ferry Fare Structure and Transit Development Plan (TDP)
Quarterly Community Meetings	25	Fast Ferry Service, Reservation System, Future Plans, 2018 budget, Orca
KT Board of Commissioners Meeting	20	CAC Report, Bus Fund, Ferry Fund, Capital Budget/Bond, Progress Reports, Staff Recognition, Comprehensive Route Analysis and Review, Grant Opportunities, Kingston Ride, Orca, Fast Ferries, Wheaton Way Transit Center, Transform Transit, Holiday Service Schedule, Extension of Saturday Service for Passenger-Only Ferry, Marine Services Work Plan, Marketing Projects, Electric Bus, Hiring Summary, Employee Referrals, Restroom Facilities for future Transit Centers and Public Comments
Citizens Advisory Committee (CAC)	10	Comprehensive Route, Analysis Report, Carlisle II 100 birthday celebration, Wheaton Way Tranist Center, Cross-Sound Passenger-Only Ferry Reservation Survey Results, Survey on Proposed Schedule, Double-Map Software, Fuel Costs, Sales Tax Report, Dial-A-Ride Service Review, Vessel Naming, Fast Ferries, M/V Finest, and Transit Development Plan
Passenger Advisory Committee on Transportation (PACT)	6	Driver of the year, Customer Survey, Appointment Times, Fast Ferry, Community Meetings, Winter Preparedness, Kingston ride, BI Ride, TapRide, Fast Ferry, Onboard safety, Sunday service, holiday service schedule, and Community Meetings
Community Outreach/Public Meetings	23	Wheaton Way Transit Center, Transform Transit, New Service Kingston Ride, Fast Ferry Service, Reservation System, Public Meeting dates/times/locations and website location, Severe Weather Shelter header signs on buses and new severe weather shelters around Kitsap County, Route Study, Title VI, LEP Vital Documents, DBE Opportunity, Comprehensive Route Analysis, Fare-Free in July for Fast Ferry new service, Orca, Low Income, Reduced Fare, Route Information, Dial-A-Ride
2018		
Type of Meeting	# of Meetings Held	<b>Topics of Discussion</b>
Quarterly Community Meetings	24 D	Comprehensive Route Review, Route Services, Electric Bus, Future Development of Routed and Fast Ferry Services, Agency solicitating Public Comment on the development of a day pass, Transform Transit, Report on the Kingston Fast Ferry Service

KT Board of Commissioners Meeting	20	CAC Report, PacShip VanPool Agreement Update, M/V Finest update, Progress Reports, Grant Opportunities, Park & Ride IP Cameras, Financial Report, Fast Ferry Service, Comprehensive Route Analysis, Employee Recognition, Trapeze Software, Capital Budget/Bond Update, Wheaton Way Transit Center, Silverdale Transit Center, and Tri-Review No Errors
Citizens Advisory Committee (CAC)	6	M/V Finest Update, DoubleMap Presentation, Transit Development Plan Review, W/D Program, Officers, Fast Ferry Performance Indicators Dashboard, Silverdale Transit Center Update, Executive Director Items, and Committee Member Items, Electric Bus, and Day Pass Pilot Proposal
Passenger Advisory Committee on Transportation (PACT)	5	Kingston Fast Ferry Service, Trapeze Maps, Seat Belts, Pilot Program/Pass Notification and Double Map App, National/Local Ridership statistics, KT 2018 goals, 2018 Holiday Schedule, Customer Service Survey, New software for Automated Notifications to Passengers - Test Phase, Tri-Review No Errors, and Rider Information
Community Outreach/Public Meetings	25	Future Development of Routed and Fast Ferry Services, Title VI, LEP Vital Documents, DBE Opportunity, Comprehensive Route Analysis, Fare-Free in November & December for Kingston Fast Ferry new service, Orca, Low Income, Reduced Fare, Route Information, Dial-A-Ride, Wheaton Way Transit Center, Silverdale Transit Center, Electric Bus, VanLink, ACCESS and eligibility process, Transform Transit, Employment Opportunity with KT, Bainbridge Island Bike Barn

Type of Meeting	# of Meetings Held	Topics of Discussion
Quarterly Community Meetings	18	Bremerton, Kingston, Poulsbo, Port Orchard, Silverdale Transportation Development Plan 2019 – 2024 Outreach, Fleet and Facilities Outreach, Impact of I-976
KT Board of Commissioners Meeting	18	CAC Reappointments, Pier 50 Ramp, Silverdale Transit Center Update, 2019 Title VI Program adoption, Capital Budget Amendment, Annapolis Ferry Dock Update, Hwy 16 P&R Location Study, Long Term Base Siting, Bremerton Dock Improvements
Citizens Advisory Committee (CAC)	3	Approval of Minutes, Board Meeting Reports - Dec & Jan Recap, Feb Business Meeting, Membership Renewal, Kingston Fast Ferry Update, Routed Service Changes, Reservation System Analysis. Other Executive Director Items and Other Committee Member Items

Passenger Advisory Committee on Transportation (PACT)	5	Kingston Fast Ferry Service, Trapeze Maps, Seat Belts, Pilot Program/Pass Notification and Double Map App, National/Local Ridership statistics, KT 2019 goals, 2019 Holiday Schedule	
Community Outreach/Public Meetings	51	Bike Barn rehab, South Kitsap Route information, Bremerton Project Connect, STEM, Mesa Redonda, Marketing Survey, Southworth Ferry Service, Silverdale Transit Center Open House, Wheaton Way Transit Center Grand Opening, Stand Down for Veterans, Bremerton back to School Fair, Kid's Day, Touch a Truck Poulsbo, BI Senior Center Outreach, Kitsap Housing and Homeless Coalition	

Type of Meeting	# of Meetings Held	<b>Topics of Discussion</b>
Quarterly Community Meetings	9	COVID-19 Response, Agency Finance and Operation 2020
KT Board of Commissioners Meeting	14	COVID-19 Response, Warrants, Minutes, Resolutions
Citizens Advisory Committee (CAC)	0	On Hold due to COVID-19
Passenger Advisory Committee on Transportation (PACT)	0	On Hold due to COVID-19

#### 2021

Type of Meeting	# of Meetings Held	Topics of Discussion
Quarterly Community Meetings	9	COVID-19 Response, Agency Finance and Operation 2021
KT Board of Commissioners Meeting	14	COVID-19 Response, Warrants, Minutes, Resolutions
Citizens Advisory Committee (CAC)	0	On Hold due to COVID-19
Passenger Advisory Committee on Transportation (PACT)	0	On Hold due to COVID-19

# Appendix B: Online Survey

# Overview

Kitsap Transit (KT) is a public transportation agency serving Kitsap County, Washington. The system is based in Bremerton, Washington and is overseen by a nine-member board composed of the three county commissioners, the mayors of the four incorporated cities in Kitsap County and two Bremerton City councilmembers.

Kitsap Transit oversees the operations of a variety of services, including: fixed routes, foot ferry service, Worker/Driver (35 commuter routes operating to and from Puget Sound Naval Shipyard/Naval Base Kitsap-Bremerton, SubBase Bangor; drivers are full time shipyard employees who are also part time Kitsap Transit operators), Vanpool, SCOOT (Smart Commuter Option of Today), a commuter alternative program and Flexcar.

Kitsap Transit conducted an online survey of its riders to collect demographic data for its Title VI report. This memo summarizes the methods, instrument, and results for the online survey.

# Survey Methodology

An online survey of riders on Kitsap Transit bus and ferry routes was conducted between March 9, 2022 and April 9, 2022. The survey collected demographic information at the rider level to inform Title VI profile development. Kitsap Transit distributed the survey through posters and survey invites in the format of business cards that were displayed on all bus and ferry routes. Additionally, the survey was promoted on Kitsap Transit's website and through social media. An incentive was offered for completing the survey to ensure a good response rate.

To increase accessibility and represent the diverse communities in Kitsap County, the online survey was available in English, as well as Spanish and Tagalog. Spanish and Tagalog have been identified as the two main languages spoken in Kitsap Transit's service area, in addition to English.



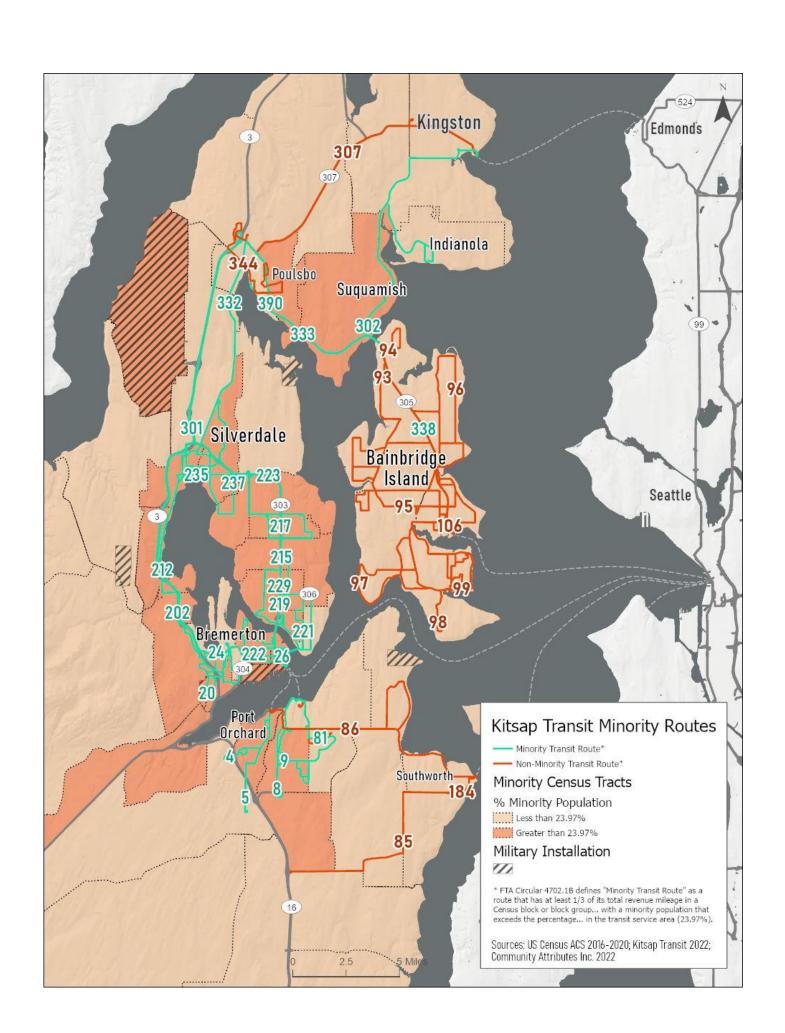


manalo ng \$100 na gift card pang-grocery!

https://bit.ly/Tagalog?

# Survey Instrument

The survey instrument included 24 questions, focused upon the demographic characteristics/travel patterns of the individual respondent. Once the survey instrument was approved by Kitsap Transit, it was translated into Spanish and Tagalog. The survey questions are on the pages following the map:



# Kitsap Transit Title VI Demographic Profile Online Survey

By telling us how you use Kitsap Transit, you can help us improve our services. The information you provide is anonymous (data cannot be linked to specific individuals). You will not be contacted by Kitsap Transit about this survey. Thank you for your time and for riding Kitsap Transit!

This survey is provided in English, Spanish, and Tagalog. Please select the language in which you would like to take the survey from the drop down above.

- 1. Have you ridden a Kitsap Transit bus or ferry recently (within the past month) or are you on a Kitsap Transit bus/ferry now?
  - Yes, I am on a bus or ferry now
  - I am not on a bus or ferry now, but I rode a bus or ferry within the past month
  - No
- 2. Are you riding:
  - A bus.
  - A ferry.
- 3. What was your most recent trip:
  - On a bus.
  - On a ferry.
- 4. Insert route number or name.
- 5. At what time did you board the bus/ferry, roughly?

#### **Demographic Information**

- 6. What age group are you in?
  - 18 or under
  - 19-24
  - 25-44
  - 45-64
  - 65-74
  - 75 and over
- 7. Do you consider yourself:
  - American Indian or Alaska Native
  - Asian
  - Black or African American
  - Native Hawaiian or other Pacific Islander
  - Hispanic or Latino
  - White
  - Multiracial or Biracial
  - Other, please specify.
- 8. How many people (total) are in your household?

- 9. What is the primary language you speak at home?
  - English
  - Spanish
  - Tagalog
  - Korean
  - Russian
  - Chinese
  - Vietnamese
  - Other, please specify
- 10. What was the total income for your household last year?
  - Less than \$10,000
  - \$10,000-20,000
  - \$21,000-30,000
  - \$31,000-50,000
  - \$51,000-80,000
  - \$81,000-120,000
  - Over \$120,000
  - Do not know
  - Prefer not to answer
- 11. Which of the following devices do you own? (Select all that apply)
  - Laptop or desktop computer
  - Laptop or desktop computer connected to the Internet
  - Tablet or other portable wireless computer
  - Landline telephone
  - Cellphone(phone, text only)
  - Smartphone (phone, text, e-mail, web browser, apps)
- 12. Do you have a disability that impacts how you use public transit?
  - Yes
  - No

# Where You Came From and Where You'll Go

If you are riding a Kitsap Transit bus or ferry now, please answer the questions below for your current trip. If you are not on a bus or ferry now, please think about your most recent trip when you answer the questions below.

- 13. Where did you come from before you got on the bus/ferry?
  - Home
  - Work/work-related
  - College/other school
  - Shopping
  - Religious worship
  - Social/entertainment
  - Doctor/medical appointment or health services
  - Other, please specify

4.	Ho	w did you get from there to the bus/ferry?
	•	Walked number of minutes
		o Number of minutes:
	•	Dropped off by someone
	•	Rode in a carpool/vanpool with someone
	•	Rode a bicycle number of minutes
		o Number of minutes:
	•	Rode a bus/train/ferry
		o Transit Agency:
		o Route #:
	•	Drove my car
	•	Other, please specify
5.	Wh	ere will/did you ride the bus/ferry to?
	•	Home
	•	Work/work-related
	•	College/other school
	•	Shopping
	•	Religious worship
	•	Social/entertainment
	•	Doctor/medical appointment or health service
	•	Other, please specify
6.	Но	w will/did you get there from the bus/ferry?
	•	Walk number of minutes
		o Number of minutes:
	•	Get picked up by someone
	•	Ride in a carpool/vanpool with someone
	•	Ride a bicycle number of minutes
		o Number of minutes:
	•	Ride a bus/train/ferry
		o Transit Agency:
		o Route #:
	•	Drive my car
	•	Other, please specify
7.	Hov	w did you pay for the bus/ferry trip?
	•	Cash
	•	Adult ORCA Card
	•	Reduced Fare ORCA Card
	•	Paper Transfer
	•	Mobile App

Other, please specify

#### **Rider Assessment**

- 18. Are there trips that you would like to make on transit, but cannot?
  - No
  - Yes
- 19. Please indicate why you cannot make those trips using transit (Select all that apply)
  - The buses/ferries do not start running early enough
  - The buses/ferries do not run late enough
  - The bus/ferry does not go where I want to go
  - The walk to the bus stop/ferry is too long
  - The bus/ferry schedule isn't reliable enough
  - The wait time between buses/for ferries is too long
  - I cannot make the transfer needed to complete my journey
  - The buses/ferry do not run during midday (11AM 3PM)
  - The buses/ferry do not run on the day I need it
  - Other, please specify

#### **How You Use Transit**

- 20. On average, how often do you ride a Kitsap Transit bus or ferry?
  - 3 or more times a week
  - 1 to 2 times a week
  - Less than once a week
  - Less than once a month
  - Unsure
- 21. How long have you been riding Kitsap Transit?
  - Less than 6 months
  - 6-12 months
  - 1-2 years
  - 3-5 years
  - 6-10 years
  - More than 10 years
- 22. What is the single most important reason you use public transit?
  - I could use a car, but I prefer to use public transit
  - I don't have a car available
  - Gas is too expensive
  - I am unable to drive
  - Other, please specify.

#### Place of Residence

- 23. Please enter your home zip code (Please select)
- 24. Enter your name and email address for a chance to win one of two \$100 grocery gift cards.
  - a. Name:
  - b. Email Address:

# **Analysis and Key Findings**

A total sample of 1,786 was achieved from the online survey. Most of the respondents reported their home zip code within Kitsap County (92%), with more than a third reporting they live in Bremerton. The table on the right shows the proportion of survey respondents residing within Kitsap County and outside.

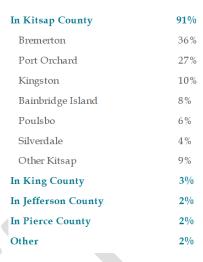
# Demographic Profile of Riders

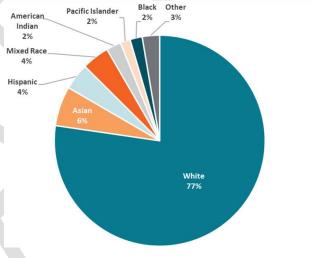
#### Race

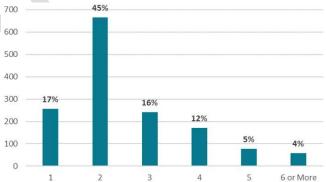
More than three quarters (77%) of all survey respondents described themselves as white. Survey respondents were more diverse than Kitsap County as a whole, which is estimated to be 82.5% white.

#### **Household Size**

Respondent household sizes were predominately two to three people (61%). This aligns with the average household size of the county as a whole, which is 2.46.

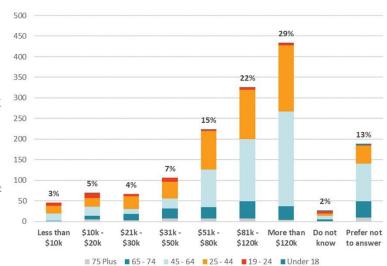






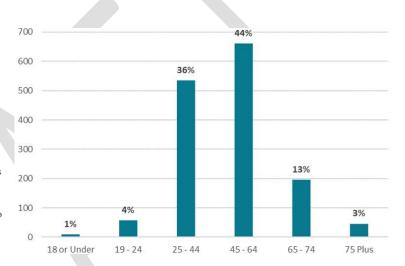
#### **Household Income**

Just 12% of respondents reported earning an income of 30K or less, with 51% stating they made more than \$80K a year. In total, 8% of survey respondents reported incomes below 20K or less, the two lowest income brackets among the options provided. The 2022 federal poverty threshold for a 2-person household is \$18,310. Depending on the size of the household, the cost of riding transit is an important consideration for low-income riders.



# Age

About 44% of those surveyed reported being between the ages of 45 and 64. Riders aged 25 to 44 represented the next largest proportion of respondents (36%). Respondents aged 24 years and younger only represented 5% of survey respondents, while those 65 years and older represented 16%. The larger proportions in the 25-44 and 45-64 age cohorts are likely because transit is used by residents primarily to commute to work.



# Travel Behavior of Minority and Low Income Riders

# **Transit Dependence**

"Choice Riders" are people who have other transportation choices, but prefer to take transit. Out of all people surveyed 35% were choice riders. A large proportion (65%) of KT riders are transit dependent. This proportion jumped up to 73% among minority riders and 80% among riders who were low income. Of those who were transit dependent, the main reason was due to not having access to a car. Given this reliance on KT's services, especially by minority and low income riders, it is important to understand the type and quality of transit services that can meet the needs of these customers.

	A11	Minority	Low Income (\$30k or Less)
Prefer transit	53%	42%	23%
Unable to drive	9%	16%	32%
No car	8%	14%	26%
Gas is too expensive	7%	10%	12%
Other	22%	18%	8%

#### **Fare Payment**

Most riders paid with an adult ORCA card, except for in the low income riders where the majority of people paid with a reduced fare ORCA card.

# Length of Time Riding

Most people reported they have been riding Kitsap Transit for 1-2 years, regardless of income or race. While the majority of riders are experienced (have been riding KT for more than one year) 13% of riders are new to KT and have been riding less than 6 months.

# **Trip Frequency**

Low income riders tended to take more trips than minority riders, though both were slightly less than the overall average for everyone surveyed.

# **Primary Purpose of Trip**

The primary purpose of most trips was commuting to work. Those who are low income were more likely to report their trip was for a reason other than a work commute. Riders who use KT for commuting to work are the agency's core market. These commutes typically involve trips from residential centers to the ferry terminals and other transfer centers. At the same time, riders who make non-work trips represent a source for incremental increases in ridership.

	A11	Minority	Low Income (\$30k or Less)
Adult ORCA Card	56%	57%	30%
Cash	16%	24%	24%
Reduced Fare ORCA Card	13%	9%	33%
Mobile App	4%	4%	4%
Paper Transfer	0%	0%	1%
Other	10%	5%	8%
	All	Minority	Low Income (\$30k or Less)
Less than 6 months	10%	14%	4%
6 - 12 Months	14%	15%	24%
1 - 2 Years	18%	22%	30%
3 - 5 Years	22%	21%	33%
6 - 10 Years	13%	13%	1%
More than 10 years	23%	17%	8%
			Low Income
	All	Minority	(\$30k or Less)
3 or more times a week	56%	53%	48%
1 to 2 times a week	19%	18%	22%
Less than once a week	13%	16%	16%
Less than once a month	11%	11%	10%
Unsure	2%	2%	4%
	A11	Minority	Low Income (\$30k or Less)
Commute to work	66%	70%	42%
Commute to school	2%	2%	2%
Non-commute	33%	29%	56%
Social/entertainment	9%	9%	11%
Doctor/medical appointment or health services	7%	4%	13%
Shopping	6%	9%	21%
Other	10%	6%	11%

# **Demographics of Minority and Non-Minority Riders**

The following table presents a demographic summary of all survey respondents, comparing minority and non-minority riders. The primary age groups for both subsets of riders were 25 to 44 and 45 to 64. Almost a third of minority riders identified as Asian, 21% as Mixed Race and another 20% as Hispanic. English was the predominant language for all riders. Roughly 22% of all respondents who identified as minority reported a household income below \$30k, compared to 12% of non-minority riders. Twice as many minority riders as non-minority riders reported they do not have access to a vehicle.

	Minority	Non-minority
	Riders	Riders
Age		
18 or Under	1%	1%
19 - 24	7%	3%
25 - 44	42%	35%
45 - 64	42%	43%
65 Plus	7%	18%
Race		
Asian	30%	0%
Mixed Race	21%	0%
Hispanic	20%	0%
American Indian	11%	0%
Black	9%	0%
Pacific Islander	8%	0%
White	0%	100%
Language		
English	89%	99%
Tagalog	5%	0%
Spanish	4%	0%
Other	3%	0%
Income		
\$30k or less	22%	12%
\$31k - \$50k	13%	7%
\$51k - \$80k	21%	17%
\$81k - \$120k	17%	28%
More than \$120k	27%	36%
Vehicle Access		
Prefer transit	42%	56%
No car	14%	7%

# Appendix C: Survey Topline

1. Have you ridden a Kitsap Transit bus or ferry recently (within the past month) or are you on a Kitsap Transit bus/ferry now?

	Yes, I am on a bus or ferry now.	62%
	I am not on a bus or ferry now, but I rode a bus or ferry within the J	past month 23%
	No.	.15%
2. If on a	bus or ferry now, are you riding?	
	A bus.	
	A ferry	
3. What v	was your most recent trip?	
	On a bus	31%
	On a ferry	.69%
4. At wh	at time did you board the bus/ferry, roughly?	
	12am – 4:59am	.2%
	5am - 6:59am	.20%
	7am – 9:59am	26%
	10am – 11:59am	
	12pm - 2:59pm,	11%
	3pm – 4:59pm	
	5pm – 6:59pm,	13%
	7pm - 8:59pm	
	9pm – 11:59pm	1%
5. What a	age group are you in?	
	18 and under	1%
	19 - 24	.4%
	25 - 44	36%
	45 - 64	44%
	65 - 74,	13%
	75 and over.	3%

# 6. Do you consider yourself:

	White.	
	Asian	6%
	Hispanic or Latino	4%
	Multiracial or Biracial	.4%
	American Indian or Alaska Native	2%
	Black or African American	2%
	Native Hawaiian or other Pacific Islander	2%
	Other	3%
7. How m	nany people (total) are in your household?	
	Average size,	2.6 pec
8. What is	s the primary language you speak at home?	
	English	97%
	Spanish.	.1%
	Tagalog,	.1%
	Korean,	.0%
	Russian	.0%
	Chinese	.0%
	Other.	
9. What v	vas the total income for your household last year?	
	Less than \$10,000	3%
	\$10,000 - 20,0000	.5%
	\$21,000 – 30,000	.4%
	\$31,000 – 50,000	7%
	\$51,000 - 80,000	15%
	\$81,000 - 120,000	22%
	Over \$121,000 _	29%
	Do not know,	2%
	Prefer not to answer	.13%

10. Which of the following devices do you own? (Select all that apply)		
Smartphone (phone, text, e-mail, web browser, apps).		
Laptop or desktop computer connected to the Internet		
Tablet or other portable wireless computer		
Laptop or desktop computer	53%	
Landline telephone	15%	
Cellphone (phone, text only)		
11. Do you have a disability that impacts how you use public transit?		
Yes.	.9%	
No.	.91%	
12. Where did you come from before you got on the bus/ferry?		
Home,		
Work/work-related	28%	
Social/entertainment	2%	
Shopping	_2%	
Doctor/medical appointment or health services	2%	
College/other school.		
Religious worship.		
Other.	3%	
13. How did you get from there to the bus/ferry?		
Walked	35%	
Average number of minutes	12 min walk	
Drove my car.	29%	
Rode a bus/train/ferry	13%	
Dropped off by someone	12%	
Rode a bicycle .	5%	
Average number of minutes	15 min ride	
Rode in a carpool/vanpool with someone	2%	
Other.	4%	

# 14. Where will/did you ride the bus/ferry to?

	Work/work-related	44%
	Home <sub>.</sub>	.28%
	Social/entertainment	8%
	Doctor/medical appointment or health services .	6%
	Shopping.	
	College/other school	.1%
	Religious worship	.0%
	Other	7%
15. How w	vill / did you get from there to the bus/ferry?	
	Walked	47%
	Average number of minutes	14 min walk
	Drove my car	
	Ride a bus/train/ferry	
	Get picked up by someone	9%
	Ride a bicycle	5%
	Average number of minutes	15 min ride
	Average number of minutes	
		2%
	Ride in a carpool/vanpool with someone	2%
16. How d	Ride in a carpool/vanpool with someone	2%
16. How d	Ride in a carpool/vanpool with someone,  Other	2% 5%
16. How d	Ride in a carpool/vanpool with someone,  Other,  id you pay for the bus/ferry trip?	
16. How d	Ride in a carpool/vanpool with someone,  Other.  id you pay for the bus/ferry trip?  Adult ORCA Card.	
16. How d	Ride in a carpool/vanpool with someone,  Other,  id you pay for the bus/ferry trip?  Adult ORCA Card  Cash.	
16. How d	Ride in a carpool/vanpool with someone,  Other,  id you pay for the bus/ferry trip?  Adult ORCA Card,  Cash.  Reduced fare ORCA Card,	
16. How d	Ride in a carpool/vanpool with someone,  Other,  id you pay for the bus/ferry trip?  Adult ORCA Card,  Cash,  Reduced fare ORCA Card,  Mobile app	
16. How d	Ride in a carpool/vanpool with someone,  Other.  id you pay for the bus/ferry trip?  Adult ORCA Card.  Cash.  Reduced fare ORCA Card.  Mobile app  Paper Transfer.	
	Ride in a carpool/vanpool with someone,  Other.  id you pay for the bus/ferry trip?  Adult ORCA Card.  Cash.  Reduced fare ORCA Card.  Mobile app  Paper Transfer.	
	Ride in a carpool/vanpool with someone,  Other.  id you pay for the bus/ferry trip?  Adult ORCA Card,  Cash.  Reduced fare ORCA Card.  Mobile app.  Paper Transfer.  Other.	
	Ride in a carpool/vanpool with someone,  Other.  id you pay for the bus/ferry trip?  Adult ORCA Card.  Cash.  Reduced fare ORCA Card.  Mobile app.  Paper Transfer.  Other.	

	The buses/ ferry do not run on the day I need it.	39%
	The buses/ferry do not run during midday (11AM – 3PM)	36%
	The bus/ferry does not go where I want to go.	28%
	The bus/ferry schedule isn't reliable enough	26%
	The buses/ferries do not run late enough	21%
	The wait time between buses/for ferries is too long	20%
	The walk to the bus stop/ferry is too long	13%
	Other	15%
18. On ave	rage, how often do you ride a Kitsap Transit bus or ferry?	
	3 or more times aweek	56%
	1 to 2 times a week.	19%
	Less than once a week	13%
	Less than once a month	11%
	Unsure	2%
19. How lo	ng have you been riding Kitsap Transit?	
	Less than 6 months.	10%
	6-12 months	14%
	1-2 years	18%
	3-5 years	22%
	6-10 years.	13%
	More than 10 years	23%
18. What's	the single most important reason you use public transit?	
	I could use a car, but I prefer to use public transit	53%
	I don't have a car available	
	Gas is too expensive	
	I am unable to drive	
	Other_	

# Appendix D: Board Approval

# **RESOLUTION NO. 22-\_**

A RESOLUTION OF KITSAP TRANSIT BOARD OF COMMISSIONERS ADOPTING KITSAP TRANSIT'S TITLE VI PROGRAM IN ACCORDANCE WITH FEDERAL TRANSIT ADMINISTRATION (FTA) CIRCULAR 4702.1B

**WHEREAS**, a Title VI Program submission is required pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Program Guidelines for FTA Recipients," effective October 1, 2012; and

**WHEREAS**, at its regular meeting on March 5, 2019, the Board approved Resolution No. 19-22 adopting Kitsap Transit's Title VI Program; and

**WHEREAS**, Kitsap Transit hired a consultant to assist with updating the agency's Title VI Program using 2020 U.S. Census data; and

**WHEREAS**, due to delays associated with the COVID-19 pandemic the original due date of April 1, 2022 could not be met and an extension was requested;

WHEREAS, the FTA extended Kitsap Transit's due date to October 1, 2022; and

**WHEREAS** federal requirements state that the Board of Commissioners of Kitsap Transit must adopt the Title VI Program; and

**WHEREAS**, the updated Title VI Program, attached and incorporated by reference herein as Exhibit A, more fully defines Kitsap Transit's Title VI requirements and processes.

**NOW THEREFORE, BE IT RESOLVED** the Board of Commissioners hereby adopts Kitsap Transit's updated Title VI Program.

**ADOPTED** by the Kitsap Transit Board of Commissioners at a regular meeting held on the 4th day of October, 2022.

ATTEST:	Edward Wolfe, Chairperson	
Stephanie Milne-Lane Clerk of the Board		

# **KITSAP TRANSIT**

# TITLE VI COMPLAINT PROCEDURE

# INTRODUCTION

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

Kitsap Transit has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter IX of the Federal Transit Administration Circular 4702.1B, October 1, 2012.

The complaint procedure is outlined below:

<u>RIGHT TO FILE A COMPLAINT:</u> Any person who believes himself or any specific class of persons to be subjected to discrimination prohibited by Title VI may by himself or by a representative file a written complaint with Kitsap Transit. A complaint must be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by Kitsap Transit.

<u>COMPLAINT TRACKING:</u> Once a complaint is received, it will be reviewed to determine jurisdiction (Human Resources under Title VI, or other department under another process). All Title VI complaints will be assigned a tracking number. If a complaint is received by Human Resources outside of the customer service office, Human Resource staff will contact customer service to obtain a tracking number via their customer service tracking system.

<u>COMPLAINT ACCEPTANCE</u>: Once a Title VI complaint has been accepted by Kitsap Transit, the Human Resources Director, or designee, will evaluate and investigate it, possibly in conjunction with Kitsap Transit's legal counsel. The complainant will receive an acknowledgement letter either informing him/her that an investigation will commence and/or requesting additional information. If the investigator is not contacted by the complainant or does not receive any additional information (if requested in the acknowledgment letter) within thirty (30) days, Kitsap Transit can administratively close the case.

<u>INVESTIGATIONS:</u> Kitsap Transit will make a prompt investigation whenever a compliance review, report, complaint or any other information indicates a possible failure to comply with this part. The investigation will include, where appropriate, a review of the pertinent practices and policies of Kitsap Transit, the circumstances under which the possible noncompliance with this part occurred, and other factors relevant to a determination as to whether Kitsap Transit has failed to comply with Title VI.

<u>LETTERS OF FINDING AND RESOLUTION:</u> After the investigation has been completed, the investigator(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Kitsap Transit's Human Resources Director will transmit to the complainant one of the following two letters based on its findings:

- a. A letter of finding indicating Kitsap Transit did not find a violation of DOT's Title VI regulations. This letter will include any explanations of why Kitsap Transit did not find a violation and provide notification of the complainant's appeal rights. If applicable, the letter can include a list of procedural violations or concerns that certain practices are questionable and that without corrective steps, a future violation finding maybe possible.
- b. A letter of finding indicating that Kitsap Transit found a violation of DOT's Title VI regulations. This letter will include a summary of the allegations and interviews of each violation referenced, a brief description of proposed remedies (including any disciplinary action, additional training of the staff member or other remedy/action), a notice of an anticipated completion date for the proposed remedies and notification of the complainant's appeal rights.

APPEALS PROCESS: The letters of finding and resolution will offer the complainant an opportunity to provide additional information that would lead Kitsap Transit to reconsider its conclusions. In general, Kitsap Transit requests that the parties in the complaint provide this additional information in writing, to Kitsap Transit's Board of Commissioners within 60 calendar days of the date that Kitsap Transit's letter of finding was transmitted. The request for reconsideration shall be sufficiently detailed to contain any items the complainant feels were not fully understood or reviewed during the investigation. After reviewing this information, the Kitsap Transit Board of Commissioners' designee will respond either by issuing a revised letter of resolution or finding to the appealing party, or by informing the appealing party that the original letter of resolution or finding remains in force. Kitsap Transit strives to transmit these letters within 30 to 60 days of receiving the appeal. If the request for reconsideration is denied, the complainant may also submit a complaint to the Department of Transportation for investigation, at FTA Region X Headquarters:

Attn: Civil Rights Officer

Jackson Federal Building

915 Second Avenue, Suite 3142

Seattle, WA 98174

Telephone: (206) 220-7954

Fax: (206) 220-7959

In accordance with Chapter IX, Title VI Discrimination Complaints, of FTA Circular 4702.1B, such a complaint must be submitted within 180 calendar days after the date of the alleged discrimination. Chapter IX of the FTA Circular 4702.1B, which outlines the complaint process of the Department of Transportation, may be obtained by requesting a copy from Kitsap Transit Human Resources Department (360) 478-6227.

Kitsap Transit reserves the right to assign any Title VI complaint to Kitsap Transit's Counsel for dissolution of any or all parts of this process. If so, Kitsap Transit's Counsel will contact the complainant.

For more information via the internet go to: <a href="http://www.fta.dot.gov/civil\_rights.html">http://www.fta.dot.gov/civil\_rights.html</a>

eff Cartwright, Human Resources Director



# Transform Transit Let's map our future together!

Kitsap Transit is looking to you to help us identify how we might transform our bus system in the future. Join project staff for one of three in-person workshops where you can learn more about the current bus system and share your ideas for the future:

Wednesday, May 17

PORT ORCHARD 5:30 - 7:30pm South Kitsap Fire & Rescue Station 8 Fircrest Dr SE, Port Orchard Monday, May 22

BREMERTON 5:30 - 7:30pm Sheridan Park Community Center 680 Lebo Blvd., Bremerton Wednesday, May 31

POULSBO 5:30 - 7:30pm North Viking Transit Center 1974 21992 Viking Ave NW, Poulsbo

Can't participate in person? Learn more and give your feedback online:

Starting TODAY until June 5 kitsaptransit.participate.online

Attend a meeting or take our survey for a chance to win a \$250 VISA gift card.

# **ABOUT THE PROJECT**

Kitsap Transit is taking a fresh look at our bus routes and services to ensure we provide safe, reliable and efficient transportation choices to meet emerging community needs. This comprehensive route analysis will look at community input, data on current ridership patterns, and projected population growth in Kitsap County. Our population is growing and it is essential we look forward and grow our bus network together. Learn more at kitsaptransit.com.

## **QUESTIONS OR COMMENTS?**

Contact us at RouteAnalysis@kitsaptransit.com

- For assistance with transportation to a meeting or for American Sign Language services, call 1-800-501-7433. -

Para la traducción de este documento al español, llame al 1-800-501-7433 durante el horario regular de oficina. El personal de servicio al cliente lo contactará a un intérprete.

Para sa pagsasalin ng dokumentong ito sa Tagalog, mangyaring tawagan ang 1-800-501-7433 sa normal na oras ng trabaho. Ikokonekta ka ng kawani ng customer service sa isang tagapagsalin.

alertsmisc/2017.indd



Issue: 5/8/2017 Remove: 6/6/2017

connect with us! • kitsaptransit.com • kitsapride@kitsaptransit.com • 800.501.7433







# RP1 Packet Title VI and LEP Program

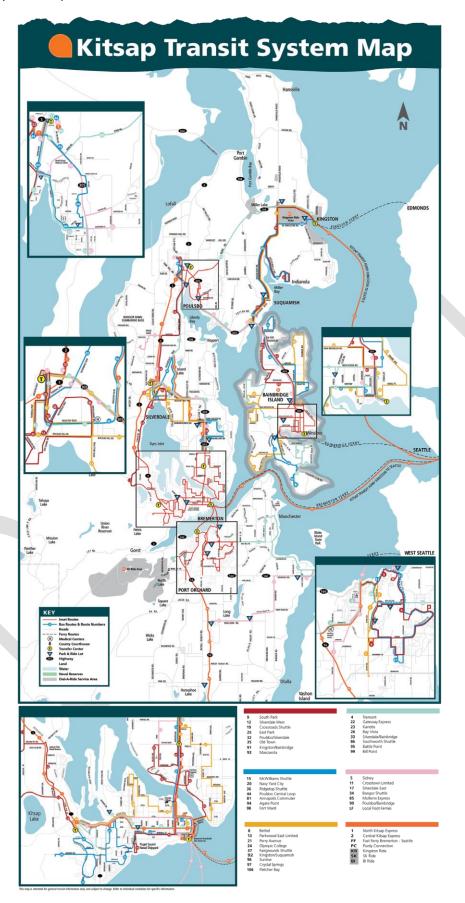
This RP1 packet contains the following Title VI and LEP documents to assist riders and to meet the criteria stated in the Title VI Program.

On-board fare information and language card with graphics. (S&T)
On-board rider alerts to provide riders with details of service changes
and schedules of public meetings. (S&T)
Title VI non-discrimination notices. (To be posted in public places.)
(S&T)
Translation information cards and language line contact. (S&T)

Rider Alerts are regularly switched out as services change and new public meetings are scheduled. Additional materials can be obtained from the Capital Department and Marketing Department if needed.

Thank you.

# Appendix H: System Map



RESOLUTION AUTHORIZING KITSAP TRANSIT STAFF TO MANAGE ITS PUBLIC COMMENT PROCESS ACCORDING TO KITSAP TRANSIT'S UPDATED PUBLIC PARTICIPATION PROCESS POLICY

# **RESOLUTION 12-30**

WHEREAS, Kitsap Transit in 2006 adopted a Public Comment Process Policy for issues that require public comment, such as fare changes, service revisions and other activities, and;

WHEREAS, Kitsap Transit has recently received a Title VI compliance review performed at the request of the Federal Transit Administration (FTA), and;

WHEREAS, Kitsap Transit's Public Comment Process Policy adopted by Resolution 06-46 at a regular meeting of the Board of Commissioners of Kitsap Transit on September 19, 2006, is in need of updating to be in compliance with Title VI requirements, and;

WHEREAS, a revised Public Comment Process Policy has been developed using the FTA guidelines and input, and;

WHEREAS, the revised policy, attached and incorporated by reference herein as Exhibit A, more fully defines Kitsap Transit's inclusion of Title VI public notice requirements and process;

NOW, THEREFORE BE IT RESOLVED by the Board of Commissioners of Kitsap Transit that the updated Public Participation Process Policy is hereby approved and the staff of Kitsap Transit are hereby authorized to manage the agency's Public Participation Process under the terms of this policy.

ADOPTED by the Board of Commissioners of Kitsap Transit at a regular meeting thereof, held on the 15<sup>th</sup> day of May, 2012.

45

Charlotte Garrido, Chairperson

ATTEST:

Cathie Knox-Browning Clerk of the Board

Resolution 12-30

# KITSAP TRANSIT PUBLIC PARTICIPATION PROCESS POLICY May 2012

Kitsap Transit promotes participation in its planning, service and fares by having a public participation policy that includes the following:

Kitsap Transit maintains a website that is up-to-date with all Kitsap Transit information including:

- Route maps and schedules
- Notifications of route detours and snow routes
- Board of Commissioners meetings and sub-committee agendas and actions open to the public
- Customer Comment Process
- Title VI considerations and Complaint Process
- Americans with Disabilities Act (ADA) complementary service
- Notifications of public meetings regarding fare and/or service

On an ongoing basis, Kitsap Transit engages the community regarding planning, service and fares through several committees and public processes.

Kitsap Transit has established the following committees:

- Citizens' Advisory Committee
- Passenger Advisory Committee on Transportation for the disability community
- Transportation for the Elderly and Disabled Committee; agencies that use Kitsap Transit's *ACCESS* service
- Limited-English Proficiency (LEP), Low-income and Minority Committee

#### Citizens Advisory Committee

Kitsap Transit has an active Citizens Advisory Committee (CAC) that meets monthly. Representatives from all areas of Kitsap County are members. Kitsap Transit will be working with its recently formed committee for LEP, Low-income and Minorities to recruit for CAC members from those areas. The CAC currently represents members of the disabled community, users of transit services from all geographic areas of the county and riders of Kitsap Transit's array of services.

The CAC discusses business and financial status and issues, service status and issues, any proposed service or fare changes and any concerns with transportation in general. Opportunities for marketing, public participation, Transit Board items and discussions are reviewed and comments and suggestions from the CAC are forwarded to the Board of Commissioners at its next meeting.

#### Passenger Advisory Committee on Transportation

Kitsap Transit's Passenger Advisory Committee on Transportation (PACT) includes members from the CAC and riders of Kitsap Transit's *ACCESS* (complementary paratransit) service. This committee meets bi-monthly or as issues arise. Comments, suggestions and complaints are gathered and addressed at these meetings. Any proposed changes to services or fares are discussed in advance with this group.

## Transportation for the Elderly and Disabled Committee

The Transportation for the Elderly and Disabled (TIED) group meets quarterly or as needed. This group discusses issues related to the *ACCESS* transportation that Kitsap Transit provides for the social service agencies in Kitsap County. Planning, service and fare changes are discussed with this group to determine what impact they might have. Many of the TIED agencies coordinate transportation with Kitsap Transit and they also purchase tokens and passes for their clients.

#### LEP, Low-Income and Minorities Committee

Kitsap Transit has recently formed a group to ensure inclusion of LEP individuals as well as members of the low-income and minority populations in Kitsap County. Kitsap Transit has contacted all of the agencies listed in its LEP Plan as well as other agencies and churches that have low-income and minority participants. Olympic College is one of the agencies that Kitsap Transit has contacted to coordinate with their Multi-Cultural Center. A complete list of included agencies is attached to Kitsap Transit's LEP plan.

This newly formed committee will meet quarterly, or as needed, to discuss any transit service, transit issues or barriers that may exist for members of the LEP, low-income and minority populations. Kitsap Transit currently offers one of the only low-income fare programs in the state of Washington.

#### Other Kitsap Transit Participation

Kitsap Transit currently is active with other community groups. Kitsap Transit shares information with these groups as it relates to transportation issues. Participation is as follows:

Kitsap County Continuum of Care Kitsap County Developmental Disability Advisory Board Senior fairs around the community

#### FARE AND SERVICE CHANGE PUBLIC PARTICIPATION POLICY

The Federal Transit Administration requires grantees to have a locally developed process and written policy for soliciting and considering public comment, including minority and low income populations according to Title VI requirements, prior to a fare increase or a major reduction in transit service. This policy describes the public comment process that Kitsap Transit will use when a fare increase or major service reduction is proposed.

Kitsap Transit will implement the public comment process whenever there is a proposed fare increase or a service reduction of more than 25% of daily revenue service hours on any route. Kitsap Transit may also implement this public participation policy for major route changes or other projects as deemed appropriate by the Service Development Director or the Executive Director.

In order to ensure that Kitsap Transit is equitable in its provision of service, and not disproportionately affecting minority or low income groups by reducing service or increasing fares, Kitsap Transit will notify the public as well as all of the committees listed in Kitsap Transit's Public Participation Policy.

Prior to a fare increase or a major service reduction, Kitsap Transit will hold a public meeting to solicit comments from the public. In the case of a proposed fare increase, Kitsap Transit will hold a series of public meetings around the county. In the case of a service reduction, the public meetings will be held in the affected area(s). Consideration will be given to using centrally located, transit-accessible facilities when appropriate for these public meetings. Public meetings will be held during the daytime hours and the evening hours to ensure maximum opportunity for people to participate. Kitsap Transit will also make every effort to accommodate persons with special needs and to include members of potentially underserved groups, including minority and low-income populations. To publicize these public meetings, Kitsap Transit will:

Resolution 12-30, Exhibit A

- Discuss all proposed changes with all Kitsap Transit Committees
  - o Citizens Advisory Committee
  - o Passenger Advisory Committee on Transportation for the disability community
  - o TIED committee of agencies that use Kitsap Transit's ACCESS service
  - o LEP, Low-Income and Minority committee
- Place Rider Alerts on the affected bus routes, and at park & ride lots and transfer centers in affected areas
- Mail notification to all Kitsap Transit committee members and participants
- Place ads in the weekly newspapers of the affected area and in the daily newspaper
- Place information on the Kitsap Transit web page so that comments may be sent in via email
- Send out Rider Alerts on Kitsap Transit's subscription e-mail service for the affected routes
- Translate critical notification documents based upon languages indicated in Kitsap Transit's LEP Plan and indicated by demographic analysis of Kitsap Transit's service area

Concurrent with public meetings, Kitsap Transit will post the materials to be presented on the Kitsap Transit website. The opportunity to comment will also be offered on-line. Comments made at the public meetings will be recorded. Upon request, Kitsap Transit will provide a translator for public meetings at which groups or individuals are present that have been identified as having Limited English Proficiency over the threshold levels that require translation. All comments, whether made at the public meetings, via e-mail, regular mail or telephone will be compiled and summarized. If deemed necessary by staff, adjustments may be suggested to the proposed change(s) based on the public comment. If the revisions are considered major, Kitsap Transit will hold additional public meetings, following the process described above.

A summary of the comments, by category, will be provided to the Kitsap Transit Board of Commissioners for consideration prior to Board approval of proposed fare or service changes.

In the case of an emergency or unusual circumstance, the Executive Director may make exceptions to these guidelines.

Failure to exactly comply with all elements of this policy shall not constitute a failure of public process, nor render any actions or decisions invalid.

