



Federal Transit Administration
Title VI Program
Knox County Transit

April 15, 2025

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents

The **Knox County Transit** Title VI plan includes the following elements:

1. Plan Approval and Revision Log
2. Policy Statement
3. Notice to the Public
4. Complaint Procedure
5. Complaint Form
6. List of transit related Title VI Investigations, Complaints and Lawsuits
7. Public Participation Plan
8. Language Assistance Plan
9. Minority Representation Table and Description
10. Providing Assistance to and Monitoring Subrecipients
11. Title VI Equity Analysis
12. MPO Requirements

Section 1: Title VI Plan Approval

Title VI Plan
Adopted on: _____
Knox County Board of Commissioners
Adopted by: _____

Signature(s): _____

Include documentation to show approval (i.e., minutes, resolutions, ordinance, etc.)

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Section 2: Title VI Policy Statement

Policy Statement

Knox County Transit, operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan.

Title VI Notice to the Public

Knox County Transit's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

KNOX COUNTY TRANSIT

- **Knox County Transit** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with **Knox County Transit**.
- For more information on **Knox County Transit's** civil rights program, the procedures to file a complaint, or to file a complaint contact 740-392-7026 x6300, (TTY 800-750-0750); email bethanycelmar@knoxcountytransit.com; or visit our administrative office at 25 Columbus Rd., Mount Vernon, Ohio 43050. For more information, visit www.knoxcountytransit.com.
- A complaint may also be filed directly with the:

Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223; or

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

- If information is needed in another language, contact the Transit Director at 740-392-7026 option 2.

The **Knox County Transit** Notice to the Public is posted in the public areas of the office and inside the transit vehicles. The public area in the office is the public bulletin board at 25 Columbus Rd., Mount Vernon OH 43050.

Notificación al público de derechos bajo el Título VI

- El Knox County Transit opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el Knox County Transit.
- Para obtener más información sobre el programa de derechos civiles de Knox County Transit, o para obtener más información sobre los procedimientos para presentar una queja llame al 740-392-7026, bethanycelmar@knoxcountytransit.com o visite nuestra oficina administrativa en 25 Columbus Rd., Mount Vernon, OH 43050.
www.knoxcountytransit.com.
- Un demandante puede presentar una queja directamente a la el Departamento de Transporte del estado de Ohio, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223.
- Un demandante puede presentar una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 740-392-7026.

Section 4: Title VI / ADA Complaint Procedure

Knox County Transit's Title VI / ADA Complaint Procedure is made available in the following locations:

- ☒ Organization website, if available: www.knoxcountytransit.com
 - ☒ Hard copy in the central office
 - ☒ Title VI Plan
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, national origin or disability by **Knox County Transit** may file a Title VI / ADA complaint by completing and submitting the agency's Title VI / ADA Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with **Knox County Transit** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, **Knox County Transit** will review it to determine if our office has jurisdiction. (A copy of each Title VI complaint received will be forwarded to the Ohio Department of Transportation within ten (10) calendar days of receipt). The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Knox County Transit has 45 days to investigate the complaint. If more information is needed to resolve the case, **Knox County Transit** may contact the complainant.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 20 days after the date of the closure letter or the letter of finding to do so.

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223, or Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact Transit Director at 740-392-7026.

Section 5: Title VI / ADA Complaint Form

Knox County Transit's Title VI / ADA Complaint Procedure is made available in the following locations:

- ☒ Organization website, if available: co.knox.oh.us/knox-area-transit/
- ☒ Hard copy in the central office
- ☒ Title VI Plan

Complaint Form:

Please check one of the following below:

☐ ADA Complaint or ☐ Title VI Complaint

Part I.

Name: _____

Address: _____

Telephone: _____

Email Address: _____

Additional Formats Needed:

☐ None ☐ TDD ☐ Large Print ☐ Audio Tape ☐ Other

Part II.

Are you filing this complaint on your own behalf?

☐ Yes – Proceed to Part III

☐ No – Please provide the name of and your relationship with this person:

Name of Individual: _____

Your Relationship: _____

Please explain why you have filed for a third party:

Confirm:

☐ I have obtained permission of the aggrieved party to file this form on his or her behalf.

☐ I have not confirmed permission to file this form on behalf of the aggrieved party.

Part III.

I believe the discrimination I experienced was based on:

☐ Other: _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses.

[illegible]

☐ Yes ☐ No

☐ Yes ☐ No

☐ Local Agency

Page 9 of 27

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Email: _____

Part VI.

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

Important Notice: To protect your rights, your complaint must be filed within 180 days following the date of the alleged discrimination. Failure to file within 180 days may result in dismissal of the complaint.

You may attach any additional written materials or other information that you think is relevant to your complaint to this form. Please submit this form by mail or in person to **Knox County Transit 25 Columbus Rd. Mount Vernon OH 43050.**

Signature and date required below.

Signature of Person Filing Complaint

Date

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

Knox County Transit maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 x There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below.*
Attach additional information as needed.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, **Knox County Transit** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio talk shows on local stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by **Knox County Transit** since the last Title VI Program submission are summarized in the table below.

Event Date	Knox County Transit Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
1/10/24	Bethany Celmar, Joe Porter	Mobility Management Advisory Committee	Email, Verbal discussion and invitations	
1/30/24	Bethany Celmar	Commissioner's Update	Website, social media	
1/30/24	Bethany Celmar, Joe Porter	Coordinated Plan Meeting	Email, verbal invitation	
2/27/24	Bethany Celmar	Commissioner's update	Website, social media	
3/7/24	Bethany Celmar	Public Meeting on Fixed Routes	Website, social media, radio, newspaper notification	
3/26/24	Bethany Celmar	Commissioner's update	Website, social media	
3/7/24-4/15/24	Bethany Celmar	Public Survey	Email, social media, newspaper	
4/9/24	Bethany Celmar, Joe Porter	Mobility Management Advisory Committee	Email, Verbal discussion and invitations	
4/15/24	Bethany Celmar	Radio discussion	Radio broadcast	
4/16/24	Bethany Celmar	Commissioner's update	Website, social media	
5/7/24	Bethany Celmar	DD trip to Center of Hope	Email, Verbal discussion, written handouts	
5/29/24	Bethany Celmar	Centerburg Senior Center Open House	Email, Verbal discussion, Posters written handouts	
5/30/24	Bethany Celmar	Commissioner's update	Website, social media	
6/25/24	Bethany Celmar	Commissioner's update	Website, social media	
7/10/24	Bethany Celmar	Mobility Management Advisory Committee	Email, Verbal discussion and invitations	
7/30/24	Bethany Celmar	Commissioner's update	Website, social media	
8/22/24	Bethany Celmar	Commissioner's update	Website, social media	
9/24/24	Bethany Celmar	Commissioner's update	Website, social media	

10/9/24	Bethany Celmar,	Mobility Management Advisory Committee	Email, Verbal discussion and invitations	
10/29/24	Bethany Celmar	Commissioner's update	Website, social media	
11/26/24	Bethany Celmar	Commissioner's update	Website, social media	
12/19/24	Bethany Celmar	Commissioner's update	Website, social media	
2/25/25	Bethany Celmar	Access To Care Group	Email, social media	
12/16/24	Bethany Celmar	Radio discussion	Radio broadcast	
1/28/25	Bethany Celmar	Commissioner's update	Website, social media	
2/19/25	Bethany Celmar	Active Transportation Coalition Meeting	Website, social media	
2/26/25	Bethany Celmar	FCFC	Email, handouts	
2/25/25	Bethany Celmar	Access To Care Group	Email, social media	
3/4/25	Bethany Celmar	Commissioner's update	Website, social media	
4/9/25	Bethany Celmar	Mobility Management Advisory Committee	Email, Verbal discussion and invitations	
4/21/25	Bethany Celmar	Radio discussion	Radio broadcast	

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, **Knox County Transit** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (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. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Knox County Transit's Language Assistance Plan includes the following elements:

- Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
- Item #2: A description of how language assistance services are provided by language
- Item #3: A description of how LEP persons are informed of the availability of language assistance service
- Item #4: A description of how the language assistance plan is monitored and updated
- Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, **Knox County Transit** has conducted a *Four Factor Analysis* of the following areas: 1) LEP Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, **Knox County Transit** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program: Identifies and assesses the frequency **Knox County Transit's** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

This section discusses how **Knox County Transit's** program and services impact the lives of people within the community. **Knox County Transit** will specify the community organizations that serve LEP persons, if available.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

The summary below discusses the low-cost methods **Knox County Transit** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Item #1 – Results of the Four Factor Analysis <i>(including a description of the LEP population(s) served)</i>
--

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

Knox County Transit's staff reviewed the latest U.S. Census Bureau data reports (either the decennial Census or the American Community Survey) and determined that 136 (.46%) persons in Knox County speak English less than very well.

Knox County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
English	55345	95.31%	58070
Speak Language other than English	2725	4.69%	58070
Speak English Less than Very Well	1148	1.98%	58070
Spanish	607	1.05%	58070
Other Indo-European languages	1948	3.35%	58070
Aisian and Pacific Island languages	154	0.27%	58070
Other Languages	16	0.03%	58070

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

Knox County Transit assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Knox County Transit provides approximately 113,197 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and ODOT, if needed, to ensure the individual receives access to the transit services.

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

All of Knox County Transit's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. Knox County Transit is committed to providing meaningful access and will provide written translation for any

of its documents, when reasonable, effective and with the available resources. In other cases, Knox County Transit will strive to provide alternative but meaningful accessibility. Moreover, Knox County Transit continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

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

Knox County Transit makes every effort to make its programs, services, and activities, accessible to LEP individuals. Knox County Transit will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
--

Knox County Transit has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) Knox County Transit has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contracting the Human Resources Department.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Knox County Transit’s language assistance measures, Knox County Transit provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Knox County Transit will continue to update the LEP plan as required by U.S. DOT. At a minimum, the plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission, or when data from the 2020 U.S. Census is available, or when it is clear that the concentrations of LEP individuals are present in the Knox County Transit service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.

- Determine whether Knox County Transit's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Knox County Transit has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Knox County Transit's failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Knox County Transit staff:

- Information on Knox County Transit Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Knox County Transit shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Knox County to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 740-392-7026.

Si usted necesita ayuda con el inglés, por favor llame 740-392-7026.

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaunh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø nouì ñõõïc Vieät Ngõõ.	Vietnamese
	당신이한국어말할경우이 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian

	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اگر آپ	Urdu

“I Speak” Language Identification Card

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population	95.3%	1.6%	1.1%	0.6%	0.3%	
Transit Advisory/Stakeholder Committee						

Knox County Transit participates in a Transit Advisory/Stakeholder Committee maintained by Knox Mobility Management. This committee is comprised of 30 participants representing community organizations in government, healthcare, education, law enforcement, and retail. In addition, there are seven general public participants. To date a race survey has not been completed by the participants in this committee. Knox County Transit and Knox Mobility Management has entertained an open participation policy on this committee. Knox County Transit also participates in the planning committee for transportation through the local Job and Family Services agency. Participation in this committee is open to the public. Knox

County Transit participates in the Access to Care committee made up of healthcare stakeholders in the community.

B. Efforts to Encourage Minority Participation

Participation on the Stakeholder committee and planning committee is open to any members of the public. Communication about board participation is posted and conveyed through social media and meetings that are open to the public. Knox County has very few cultural centers in the community due to the lack of cultural diversity but every effort is made to reach minorities to encourage participation.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

☒ No, the agency does not have subrecipients.

☐ Yes. If yes, list the subrecipient names: (list other agency names here)

Knox County Transit monitors subrecipients using the following process:

1. Knox County Transit uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA C4702.1B: (document the process here)
2. Knox County Transit collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

Section 11: Title VI Equity Analysis

1. Has the agency built a facility? (check a response below)

☒ No, the agency has not built a facility.

☐ Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the TVI plan a copy of the Title VI equity analysis.)

Section 12: Requirements for Metropolitan Planning Organizations (MPOs)

☒ N/A

All MPOs must meet the following requirements if the agency is included in the MPO constituency.

MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)	Status
---	--------

1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	<input type="checkbox"/> Y <input type="checkbox"/> N
Comments:	

TITLE VI EQUITY ANALYSIS

NEW FACILITY ACQUISITION

KNOX COUNTY TRANSIT

Contents

BACKGROUND & PROJECT DESCRIPTION	22
A. Transit Agency Basics.....	22
B. Project Description	22
C. Project Benefit	22
STUDY PURPOSE	22
TITLE VI COMPLIANCE.....	23
SITE SPECIFICS.....	24
A. SITE IDENTIFICATION PROCESS.....	24
B. BENEFITS AND BURDENS ANALYSIS	24
C. ALTERNATIVE EQUITY ANALYSIS.....	25
D. COMMUNITY OUTREACH	25
E. SITE LOCATION MAPS.....	25
F. CUMULATIVE IMPACT ANALYSIS.....	27

BACKGROUND & PROJECT DESCRIPTION

A. Transit Agency Basics

Knox County Transit is a County department providing public transportation in Knox County, Ohio. Knox County Transit reports to the Knox County Commissioners. Knox County Transit runs two types of Public Transportation in Knox County. Door to door demand response services are available from 5:00 AM to 7:00 PM. One vehicle runs door to door demand response for designated workplace zones from 7:00 PM to 3:00 AM. One deviated fixed route is provided Monday through Saturday 10:30 AM to 8:30 PM.

Knox County Transit ridership increased 5% from 2023 to 2024. Average trip counts each month are between 8,500 and 9,000 trips. In 2024 Knox County Transit had a total trip count of 105,242 trips. Between regular daily riders, group trips and the deviated fixed route it is estimated Knox County Transit serves about 8,000 unique individuals in the county to provide the transportation needs. That is 12% of the total population of the county.

Knox County Transit provides these services with 17 full-time Drivers and 7 part-time Drivers. Our schedule is coordinated by a staff of 5 full-time and 4 part-time employees. We have 1 Mechanic and 1 part time detailer. Our staff of 39 employees is rounded out by 3 managers and the Director.

B. Project Description

The proposed project is to construct an 8,100 square feet (sf) Transit Community Center that includes a transit facility and administrative offices, a 7,000 sf Vehicle Maintenance Facility and a 28,800 sf Transit Vehicle Storage Facility that will accommodate the current needs of Knox County Transit and allow room for future growth. The Transit Community Center will be located at 503 West High Street, Mount Vernon and the Vehicle Maintenance and Storage Facility will be located at 601 West Chestnut Street Mount Vernon. This project will be on two separate parcels, located approximately 528 feet from each other. The project scope includes 60,900 sf of asphalt paving, 1,100 linear feet of fencing, landscaping, and site work. The buildings that were located at 503 W. High Street were demolished in Early 2022 prior to the purchase of properties.

C. Project Benefit

Knox County has been looking for a new location for approximately six years. After reviewing options of vacant buildings in the community it became apparent that none of the facilities would work to suit the needs of the transit or our residents due to the fact that the majority of them were too far from the downtown Mount Vernon County, thus causing our passengers a major inconvenience to try to get to the new location to get on/off of our buses. Mount Vernon, Ohio is a close-knit city that houses 27% of the county's entire population. As the only city in the county, it is the primary location for government offices, retail, restaurants and non-profit offices. A number of these organizations have joint initiatives related to improving transportation in our county. Our current building location inhibits us from addressing the obstacles that have been identified. Our new building is a vital piece to break down barriers to access to healthcare and work. The specific location picked for the new building is imperative for our solutions.

The vision for our new Community Transit Center is to be a transfer station hub where all of our free deviated fixed routes intersect. Residents of Mount Vernon would be able to board a bus in their

neighborhood, switch buses at the station, then travel to any corner of the city. In discussing a location for a new transit community building with local stakeholders, one common attribute was identified consistently. The building must be as close to downtown Mount Vernon as possible.

The lot purchased by the county is one of the only lots available in the downtown County that would be large enough to accommodate our Community Transit Center. Not only is this site a walkable distance to the west side shops and government buildings in downtown, but it will also give pedestrian access to several new manufacturing and business facilities in the Heartland Progress Park in which it borders. This would make it easy for clients to ride to the transit center and walk to work from our location. The county Health Department has recently purchased a lot a few blocks away and will house a walk-in medical clinic. By having our transit building at the specific location of this lot, we will be giving community members easy access to public health care and work locations.

This site also borders two low-income neighborhoods that are close to downtown. Community members could easily walk or ride a bike to the transit center and then ride a bus to be transported to another end of town. The lot location is an ideal location for the county as well. It sits three blocks from a major intersection of State Route 13 and State Route 36. Two villages are directly located along those state routes.

STUDY PURPOSE

The purpose of the Title VI Equity Analysis is to determine whether the site selected for the new Operations Center will disproportionately impact or burden people on the basis of race, color, or national origin.

TITLE VI COMPLIANCE

Knox County Transit is committed to complying with Title VI. The Title VI Policy Statement is as follows:

- **“Knox County Transit**, operating demand response and deviated fixed route transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. **Knox County Transit** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with **Knox County Transit**.

According to FTA Circular 4702.1.B regarding the determination of site or location of facilities: Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits or, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

SITE SPECIFICS

A. SITE IDENTIFICATION PROCESS

Knox County Transit started looking at sites six years ago. The vision for the location was to find something easily accessible and safe for riders to walk to and centrally located to foster efficient routes to coincide at the Community Transit Center as a hub. We wanted the location to be close to work and residential locations. At the time we started looking a large manufacturing company had just vacated a campus. We worked with the County Development Foundation who took over management of the property and reviewed several buildings on and around the newly vacated site.

1. Building on Greenwood Avenue in Mount Vernon, Ohio. This building was too large for our needs and would have required considerable work to make it safe as a transfer station. It was also a little far from main roads to be easily accessible.
2. Shellmar Factory Site- a previous candy wrapper company manufacturing building had been demolished leaving a large concrete pad Area on 298 Madison Street Mount Vernon, Ohio. The site was far bigger than what we needed and would hinder development of a larger manufacturer building on site. The location was also not easily accessible or walkable to the public. We would also have to remove the old concrete at the site and it would have been an extra burden to the project.
3. Next we looked at a 4 bay building and a 3 bay on the Heartland Commerce Park site in Mount Vernon Ohio. The 3 bay building was too small and the 4 bay building needed a lot of remodeling work. Both buildings had concrete floors that were 3 feet thick and would have required quite a bit of demolition to put the necessary drainage to meet regulations for a Mechanic work Area. These buildings were also dangerous to access by walking because they were in the middle of the commerce park which would have traffic from other manufacturers. The property is also gated so it would have directed all foot traffic through one access point that would have created congestion for pedestrians and vehicles.
4. There was also a site on 301 N Mulberry Mount Vernon, Ohio. This is the site of the old high school. The idea was to buy the property and demolish the building and then build on it. The building was not up for sale and the owner was not interested in selling.

The sites we selected were developed by the Area Development Foundation. They were the best choice because they would not need concrete demolition or the demolition of a building. These are open sites ready for a building. The Community Transit Center is on a main road with sidewalks that are easily walkable. The site borders the manufacturing park but is not in it creating hazards and unnecessary congestion. The site is easily accessible to one of the lower income Areas of town.

B. BENEFITS AND BURDENS ANALYSIS

The selected site was evaluated to determine the benefits and burdens of an impact of a Transit Community Center. Table 1 (see below) presents the benefits and burdens of the site:

Site	Benefits/Positive Impacts	Burdens/Negative Impacts
503 West High Street and 601 West Chestnut Street; Mount	<ul style="list-style-type: none">• Easily accessible to residents• Safe for pedestrians• The building's location is central to the City and conveniently located	<ul style="list-style-type: none">• Construction of a new building may temporarily interrupt Chestnut Street traffic.

Vernon, OH
43050. Parcels:
66-01281.000; 66-
09538.001 and
66-09538.000

for low income residents and
Heartland Commerce industrial
park.

- Location makes an excellent place for routes to overlap for riders to transfer.
- No need for remodeling or demolitions of prior buildings, new building will meet all regulations for safety and accessibility
- Brings new development to County of town in need of positive change
- Maintenance building is separate and makes less congestion at the Transit Center where pedestrians will walk.

C. ALTERNATIVE EQUITY ANALYSIS

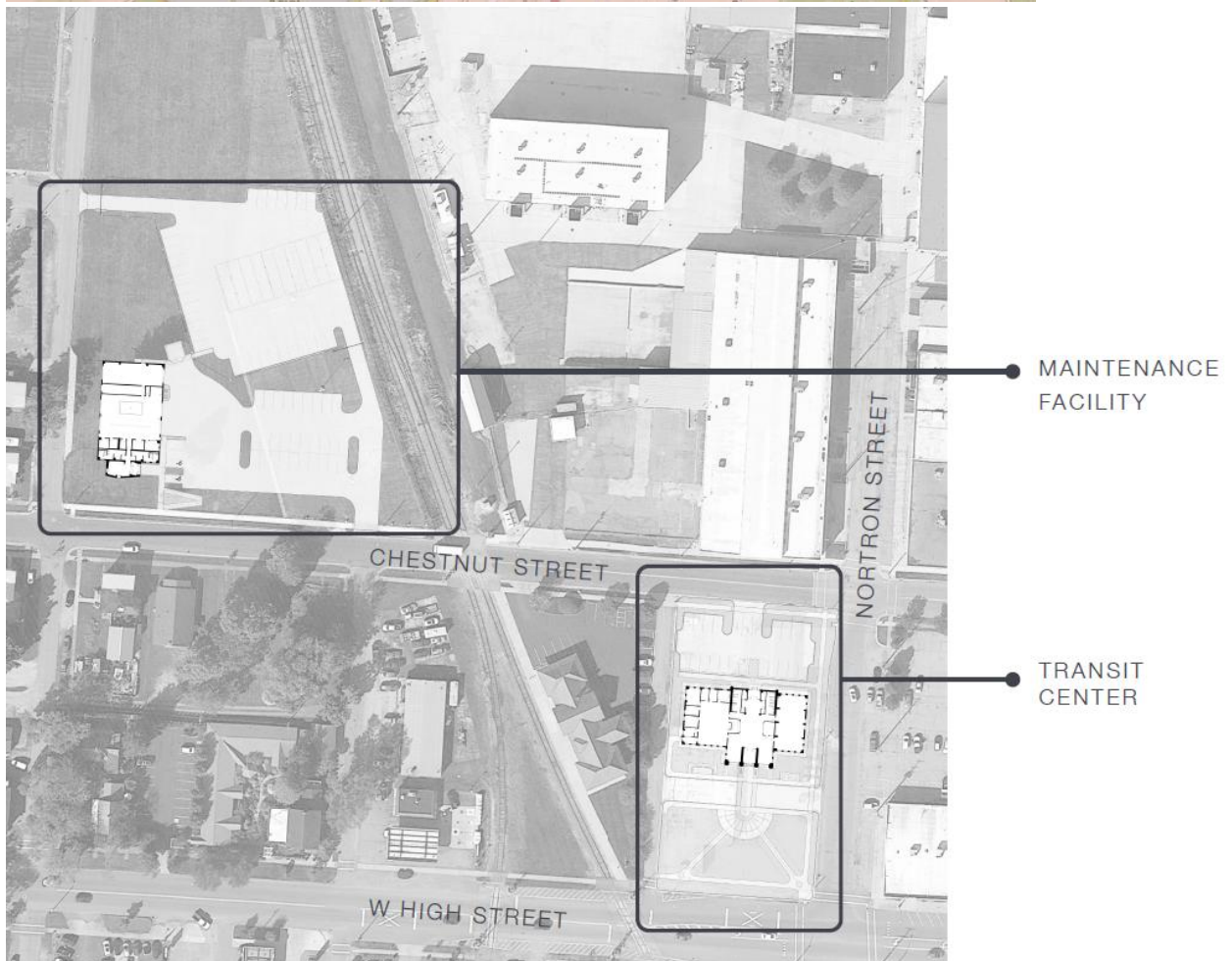
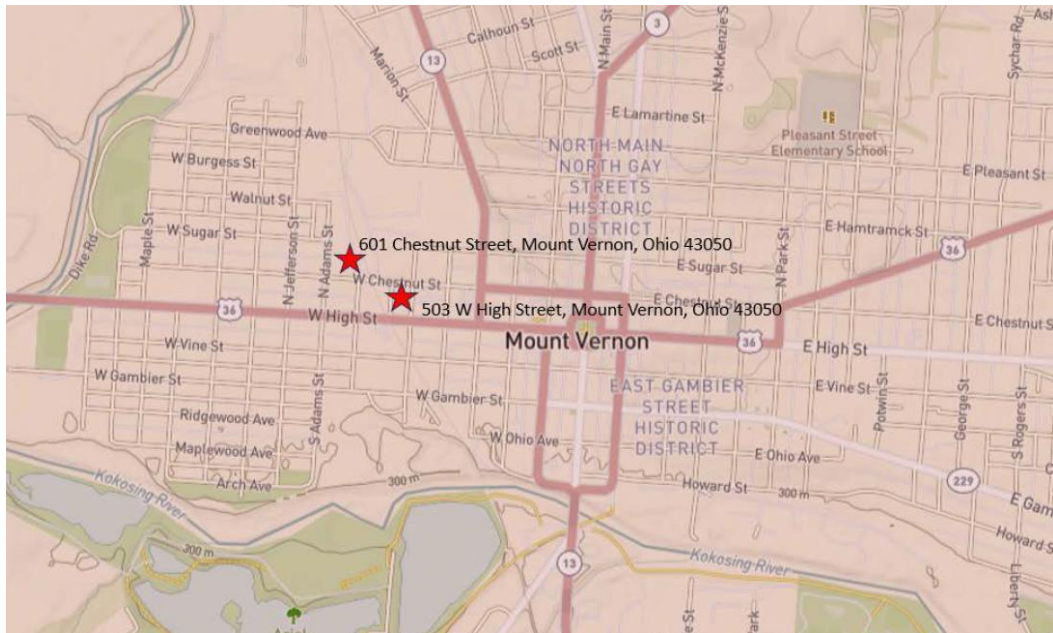
No other site is available that would meet the needs of the community and Knox County Transit. This site gives the best access to residents and better equity to residents than our current facility or any of the other options reviewed.

D. COMMUNITY OUTREACH

The Knox County Commissioners collaborated with several community organizations to look for sites and evaluate the best plan. Once a site was decided key stakeholders and the public were made aware of the proposed plans and given the opportunity for feedback. Entities consulted for feedback were the Area Development Foundation, the City of Mount Vernon, Knox County Job and Family Services and Ariel Foundation. Public communication and opportunity for comments were distributed through presentations to the Kiwanis Club and the Rotary Club as well as a release to the news media Knox Pages. No concerns were raised from the community. The property for the Maintenance building was previously part of a heavy manufacturing site with lots of large vehicle activity. The bus garage and parking will not increase activity from prior use for the surrounding counties. Community feedback about the Community Transit Center with the waiting County site is overwhelmingly positive. Many community members and riders have been following up to hear about progress on the potential new buildings.

E. SITE LOCATION MAPS

These maps show the distance between the facilities at 503 West High Street and 601 West Chestnut Street.



F. CUMULATIVE IMPACT ANALYSIS

The Transit Center will create a positive social impact for the community. The new transit center will provide customers with a proper transit waiting environment and facilities. The location of the new Transit Center will provide walkability to the surrounding community that has a high usage of transit.

The project County abuts an industrial complex and will connect the business district and residential neighborhoods. This County is currently served by transit and the new transit center will aid in the walkability to the surrounding community. There are two census tracts, Tract 71 and 76, that are within 0.25 miles from the project site. The tables below are community information of these tracts:

Table 1: Race Demographics

Race	EJ Screen (Census Tract 76, 71)
White alone	96.0%
Black	1.0%
American Indian	0.0%
Asian	0.0%
Hawaiian/Pacific Islander	0.0%
Other Race	0.0%
Two or more races	3.0%
Hispanic	0.0%

Table 2: Community Information

Community Information	EJ Screen (Census Tract 76,71)
Low Income	52%
Less than high school education	10%
Persons with disability	22%

Table 3: Language Spoken at Home

Languages Spoken at Home	EJ Screen (Census Tract 76, 71)
English	99%
German or other West Germanic	1%
Total Non-English	1%