

Capital Area Transit System (CATS) Baton Rouge Title VI Program 2022-2024 Update



Final

September 2022



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I. OVERVIEW

A. Purpose

Capital Area Transit System (CATS) is responsible for complying with Title VI of the Civil Rights Act of 1964. Pursuant to 49 CFR 21.9 (d), it is CATS' goal to ensure that no one is denied participation in, denied the benefits of, or is otherwise discriminated against in regards to the provision of public transportation because of race, color, or national origin. The Federal Transit Administration (FTA) requires that transit agencies that are recipients of federal funds maintain a Title VI Program to ensure compliance with Title VI. Title VI prohibits discrimination on the basis of race, color, national origin, or income during the provision of transit services by recipients of Federal financial assistance. To demonstrate compliance with these provisions, Capital Area Transit System (CATS) is submitting this report in accordance with FTA Circular 4702.1B issued October 1, 2012. CATS is committed to upholding the intent and obligation of Title VI regulations and to providing meaningful language assistance to persons who are limited in English proficiency.

In March 2021, the CATS board adopted a strategic plan for the agency. In this plan, a mission, Core Values, Strategic Priorities, and measurable goals and targets were established. The overall strategic mission is:

*ENRICHING THE LIVES OF OUR CUSTOMERS AND
COMMUNITIES BY OFFERING INDEPENDENCE AND
SAFETY...CONNECTING YOU TO WHAT MATTERS.*

In addition, the overall strategic values adopted are:

1. Customer Focused Service
2. Safety First
3. Social and Environmental Responsibility
4. Drive Economic Innovation
5. Culture of Excellence
6. Integrity in everything we do

Strategic Values established are:

1. Mobility and Ridership
2. Management and Financial Sustainability
3. Capital Investment
4. Community Stewardship

These established values and priorities were used to develop goals and thresholds incorporated in the service standards section of this document.

The CATS board of commissioners adopted this plan September 20, 2022. The minutes of the meeting are included in **Appendix H**.

B. Background of the Service Area

Capital Area Transit System (CATS) is the regional transit authority of the Baton Rouge metropolitan region. CATS provides quality mass transit services within the cities of Baton Rouge and Baker. The U.S. Census Bureau's American Community Survey (ACS) data for the 2020 5-year estimate will be used for population characteristics detailed in this document.

Since the election in 2012, the CATS service area has comprised the corporate limits of the cities of Baton Rouge and Baker, with a total area of 97 square miles. The property tax, authorized in 2012, was renewed in the fall of 2021 for another 10 years.

The City of Baton Rouge was incorporated in 1817 and became the Louisiana state capital in 1849. The ACS estimates the 2020 population at 222,191 while the median household income is \$44,177. The City of Baton Rouge covers a 77 square mile area and is located in East Baton Rouge Parish, on the east bank of the Mississippi River.

The City of Baker is a suburb of Baton Rouge and has been a contributing member of CATS since 2012. According to the ACS, the 2020 population for the city of Baker was estimated at 13,233, and the median income was \$64,455.

CATS provides fixed-route service and paratransit service for disabled passengers. CATS currently operates 23 fixed routes and paratransit services, with 41 peak transit buses and 22 paratransit vans operated in maximum services. Two routes are still suspended at this time.

The baseline set of demographic characteristics were developed in the 2021 update of this plan using 2019 American Community Survey (5-year) block group level census data characteristics analyzed through the SimpleGIS Software application. The block groups were redrawn with the 2020 Census and instead of 239 block groups that intersect the CATS service area covering (192.1 sq. miles), there are now 245 block groups that cover 181.9 sq. miles. Each of these 245 block groups are used as a whole if they intersect the service area in order to accurately depict the population characteristics of the service area. The breakdown of the population in terms of race for the CATS service area is detailed in **Table 1**.

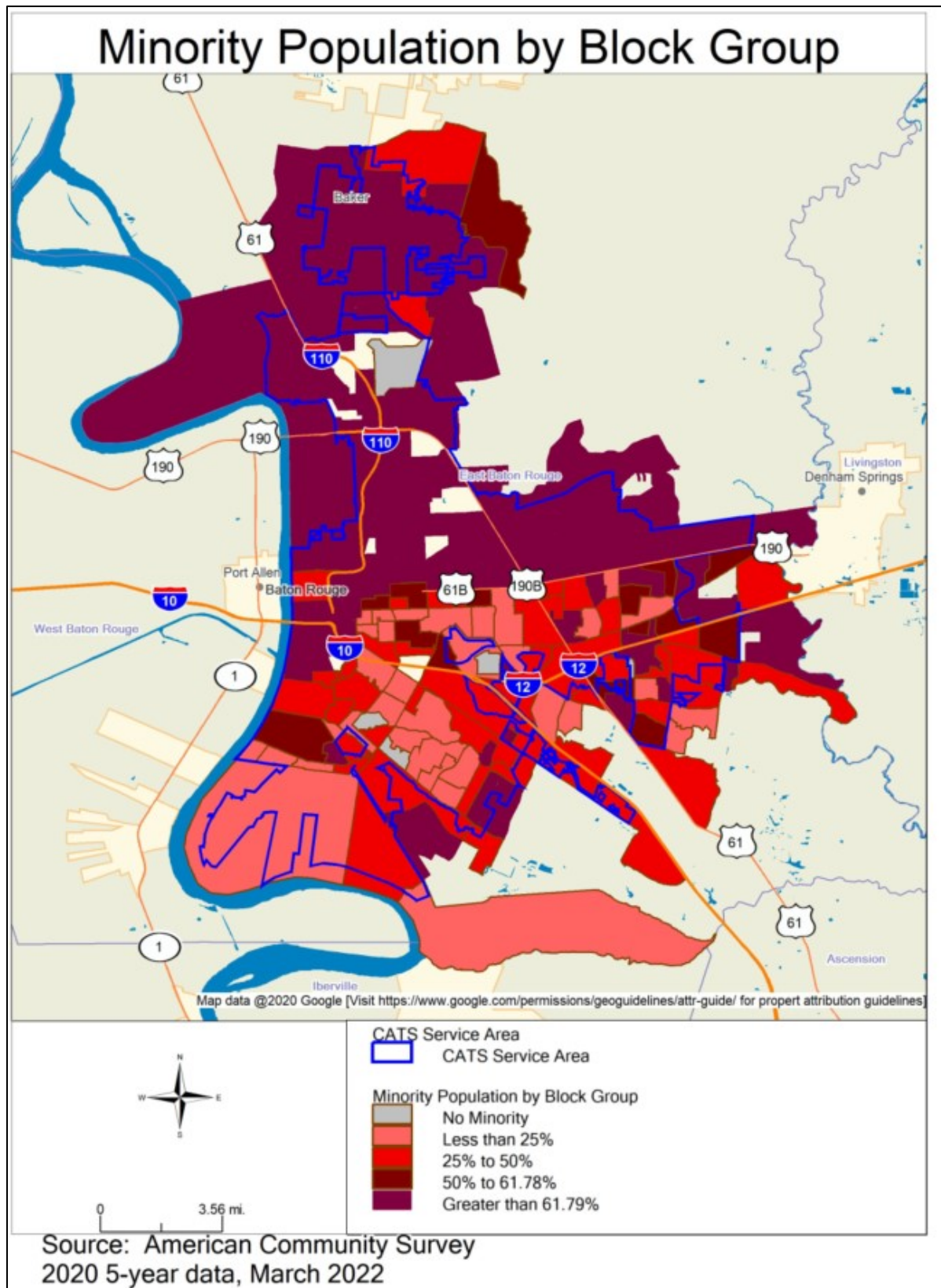
Table 1: 2020 CATS Service Area Racial Composition

	Population 2020	Percent of Total
White	118,374	38.21%
Black / African American	158,935	51.30%
American Indian / Alaska Native	809	0.26%
Asian	9,787	3.16%
Hawaiian / Pacific Islander	299	0.10%
Other Race	6,969	2.25%
2 or More Races	14,644	4.73%
Total	309,817	100.00%

Source: US Census Bureau American Community Survey 2020 5-year estimates, March 2022.

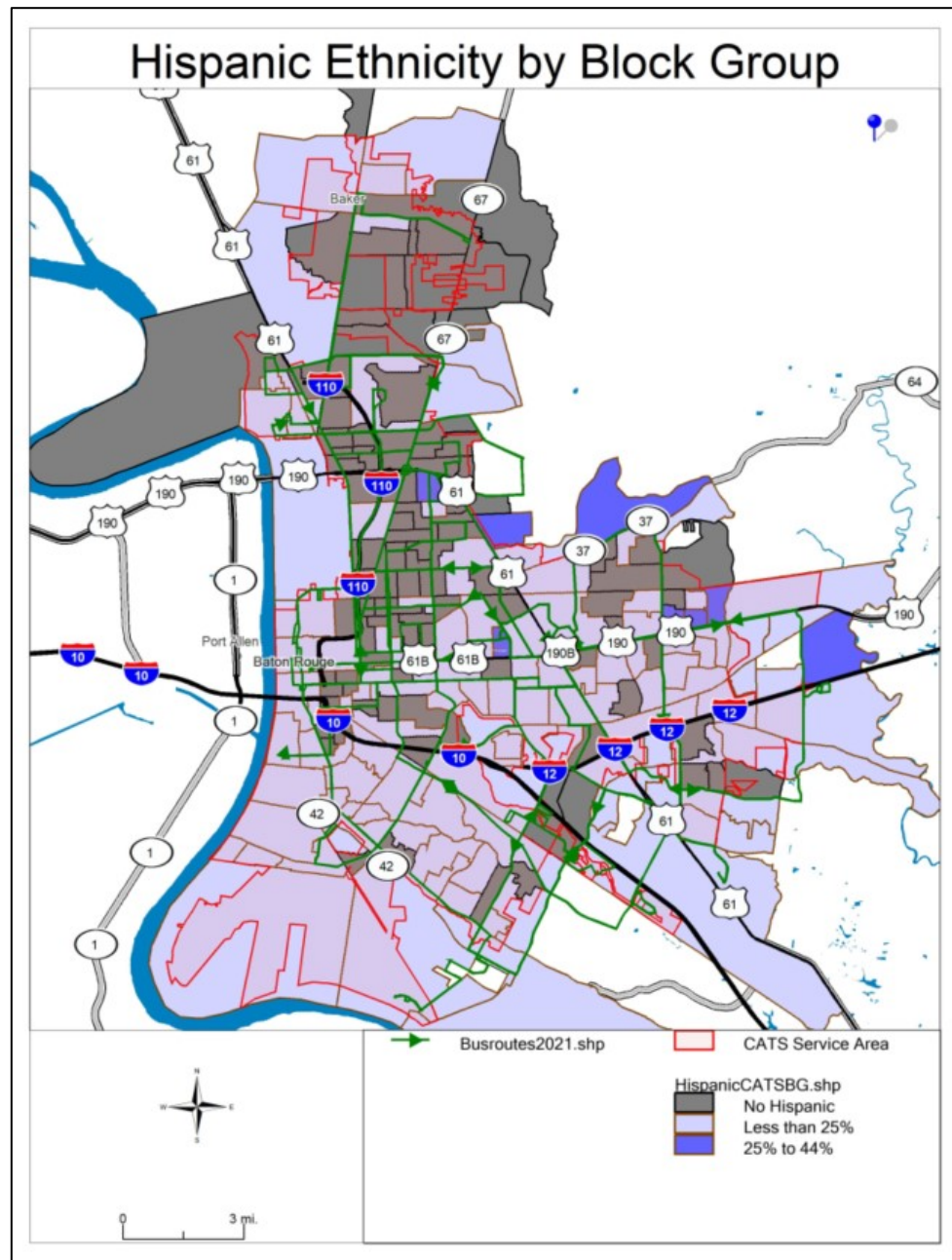
This analysis details that 61.79% of the population in the CATS service area is considered minority. In addition, 143 of the 245 block groups have a percentage minority population that exceeds that of the service area as a whole. **Figure 1** depicts these block groups and the percentage of the minority population.

Figure 1: Minority Population by Block Group



In addition to detailing the minority composition of the population, the ACS also measures those in the population that identify as having a Hispanic ethnicity. **Figure 2** shows the percentage of those community members in the respective block groups. Figure 2: Hispanic Population by Block Group

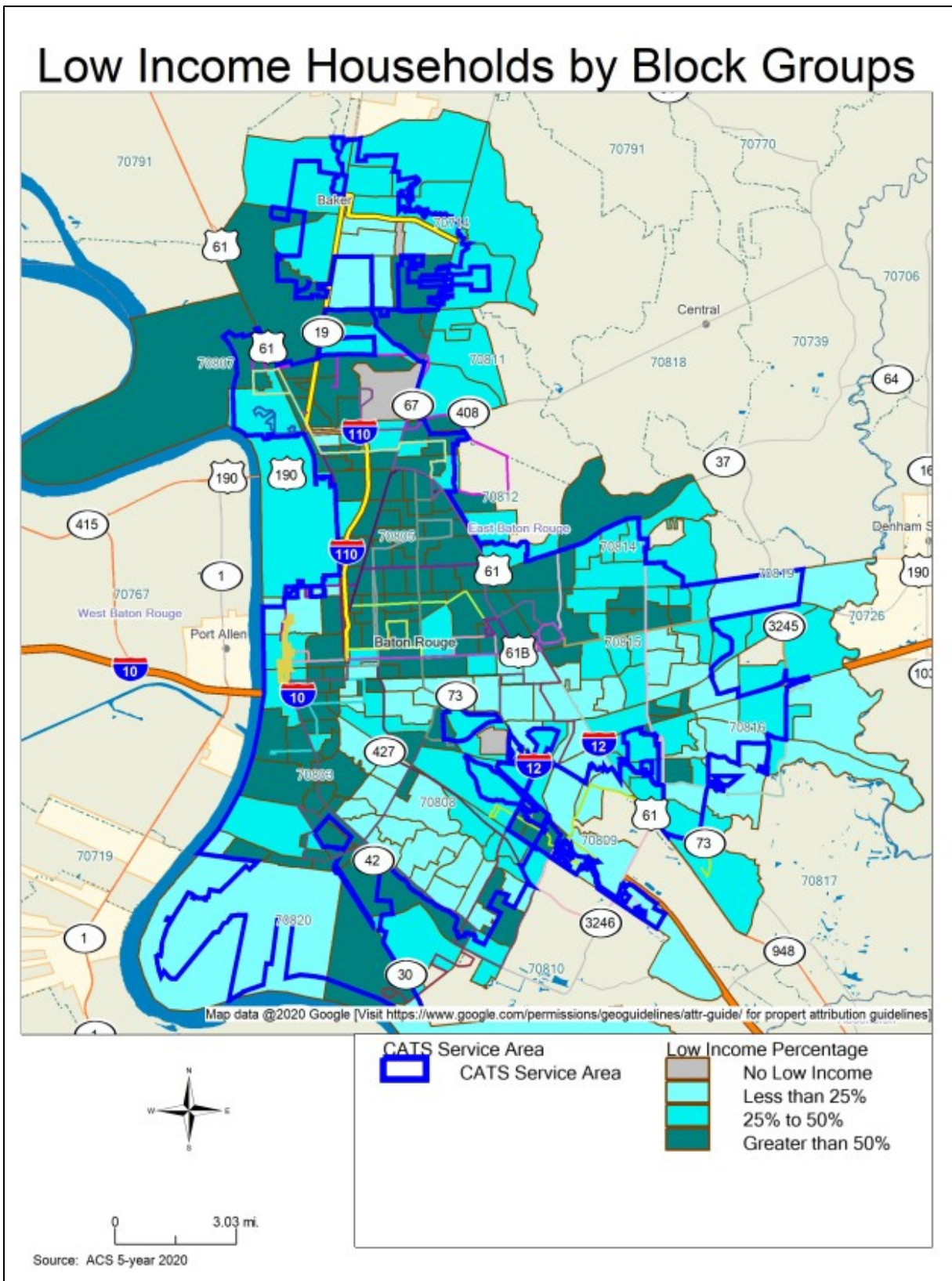
Figure 2: Hispanic Population by Block Group



Source: Census 5-year American Community Survey 2019

In addition to the protection of minority races and ethnicities, low-income populations are protected from discrimination. The 2020 ACS block group data shows that 40% of the population in the CATS service area has an income less than 1.5 times the US Department of Health and Human Services (HHS) poverty threshold. The percentage of low-income households in each block group is highlighted in **Figure 3**.

Figure 3: Low Income Population by Block Group



C. CATS Service Provision

Fixed-route Revenue Service

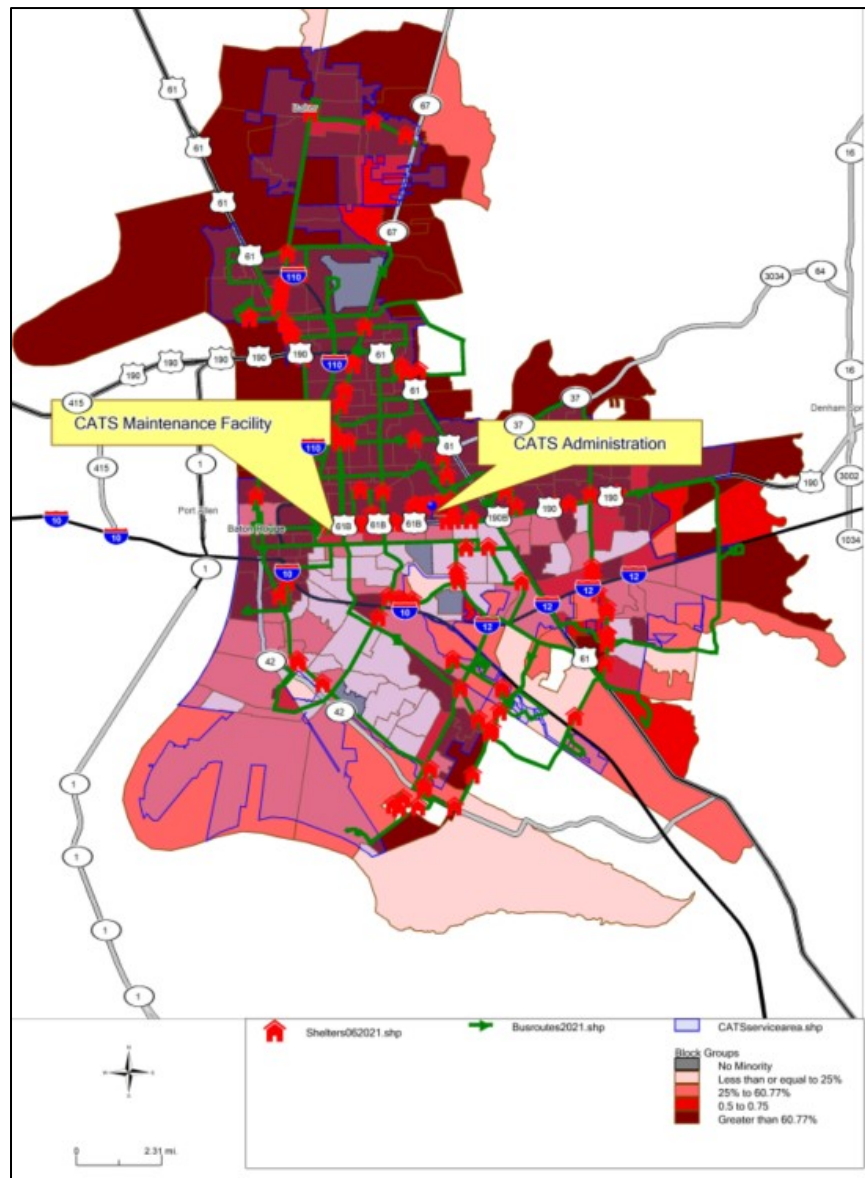
As of January 2021, CATS' total fleet is comprised of 64 fixed-route vehicles and 22 paratransit vehicles. **Appendix A** includes a complete vehicle inventory and fleet replacement plan as of February 2021. CATS operates 41 peak-hour fixed-route buses and provides public transportation for 3.8 million unlinked passenger trips annually, according to the NTD 2019 Agency profile. CATS accrues 14.4 million annual passenger miles and 3.9 million annual vehicle revenue miles. **Table 2** provides the peak frequencies of service by day for all CATS routes. **Figure 4** depicts the CATS service area and key amenities and facilities.

Table 2: Service Days and Operating Frequencies (Headway) by Route

Route #	Route Name	Weekday		Saturday	Sunday
8	Gus Young / BRCC	60	60	60	60
10	Scenic Hwy / Southern Univ	30	60	60	60
11	Northside Circular	60	60	60	60
12	Government St / Jefferson Hwy	30	45	45	45
14	Thomas Delpit Dr	60	60	60	60
15	Glen Oaks / Blount Road / Crestworth	30	60	60	60
16	Capitol Park Shuttle	15	15	N/A	N/A
17	Perkins Road - Mall of LA	45	60	60	60
18	Cortana Transit Center / Tigerland	60	60	60	60
20	North Acadian Thruway	60	60	60	60
21	Fairfields Ave	60	60	60	60
22	Winbourne Ave	60	60	60	60
23	Foster Drive	60	60	60	60
41	Plank Road	30	30	30	45
44	Florida Blvd	30	30	30	45
46	Cortana Transit Center / L'Auberge	60	60	60	60
47	Highland Road / LSU	30	45	45	60
54	Airline / Southern University	45	60	60	60
57	Sherwood Forest Blvd	45	45	60	60
58	Coursey Blvd / O'Neal Lane	60	60	60	60
59	East Florida Blvd	60	60	60	60
60	Medical Circulator	45	45	45	60
70	Baker Limited	45	45	60	60
72*	Florida Boulevard Limited Stops				
80*	Southern University Shuttle				

Note: * Service suspended.

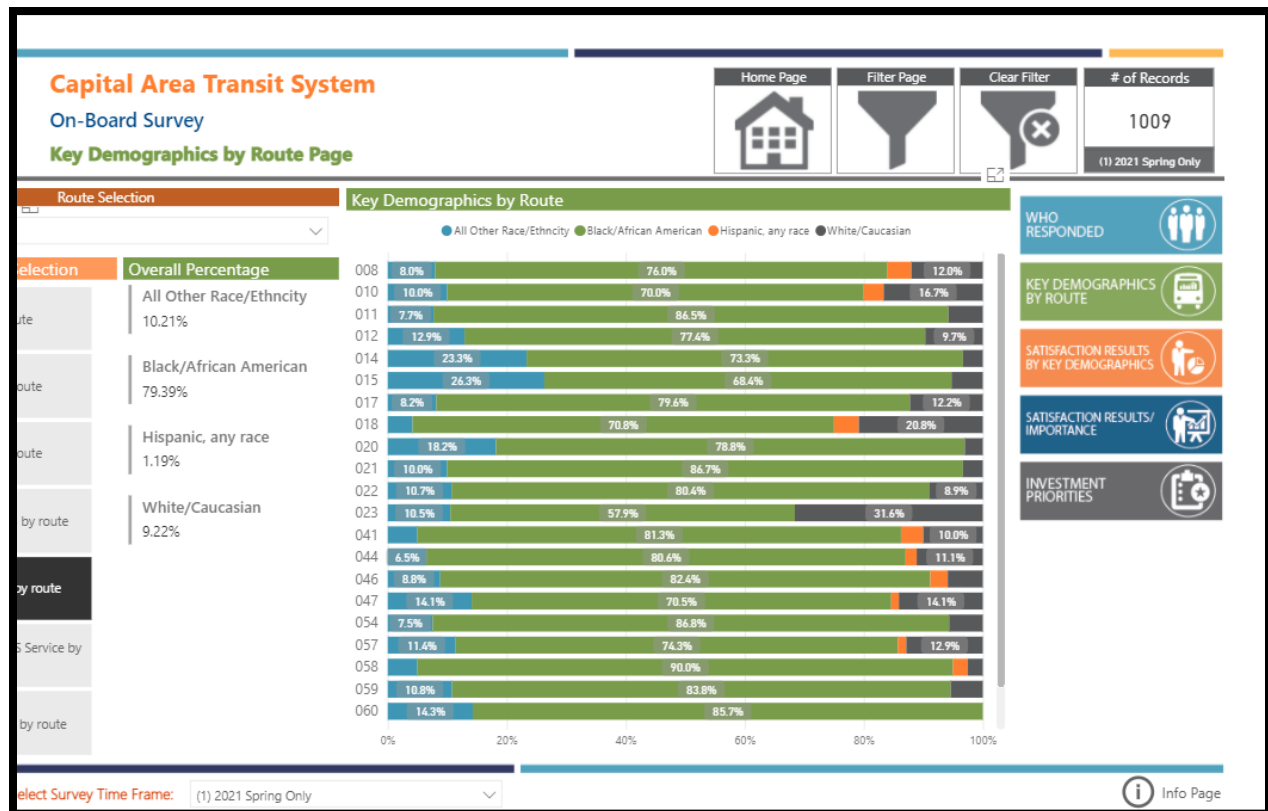
Figure 4: CATS Service area and Fixed Route Service



On-Board Survey

Starting in the fall of 2018, CATS contracts with the ETC institute to conduct an on-board survey twice a year. This survey measures trip purpose, demographic information, and customer satisfaction along with other data. As shown in **Figure 5** the majority of ridership (79.39%) identified as African American.

Figure 5: On-Board Survey Dashboard



Paratransit Services

CATS also provides paratransit service as required under the Americans with Disabilities Act (ADA). A contracted service provider operates the paratransit service, CATS On Demand, for CATS. CATS On-Demand operates 18 paratransit vans each day and serves nearly 95,000 annual passengers as noted in the 2019 NTD Agency profile.

ADA Paratransit service operates seven days a week, with service schedules consistent with CATS' span of service for fixed-route service operation. CATS On-Demand operates Monday thru Friday from approximately 4:15 a.m. - 12:00 a.m., and Saturdays and Sundays from 5:15 a.m. - 11:30 p.m. CATS On-Demand fares are \$1.75 per ride. **Figure 6** depicts the complementary paratransit service area.

Microtransit Service

CATS recently implemented a pilot project in the city of Baker for microtransit service. This project is a pilot project and part of the evaluation of the pilot project was a service equity analysis that is included in **Appendix B**.

Figure 6: ADA Complementary Service Area



II. GENERAL REPORTING REQUIREMENTS

A. Monitoring Subrecipient Compliance with Title VI

At this time, CATS has no subrecipients. Therefore, this section only remains in the plan for future reference.

To ensure that all subrecipients comply with Title VI regulations, grants staff and program managers monitor the performance of sub-recipients quarterly in accordance with FTA milestone reporting. The subrecipient monitoring process is summarized below. Note: If a subrecipient is already a direct recipient of FTA funds, CATS is not responsible for monitoring the sub-recipient's Title VI compliance.

Grants staff:

- Ensure that project agreements with sub-recipients contain all required federal documents and clauses, including sample notices to the public informing them of their rights under Title VI, sample procedures on how to file a Title VI complaint, sample procedures for tracking and investigating Title VI complaints, and information regarding expectations for notification from the subrecipient to CATS when a Title VI complaint is received.
- Request sub-recipients provide us with Federal Funding Accountability and Transparency Act (FFATA) information, and requests sub-recipients provide us with a copy of a Title VI Plan.
- Review Title VI plan, if required.
- File copy of agreement/contract, FFATA form, and Title VI plan, if available, in Grants Official Subrecipient File.
- Submit FFATA information on the www.FSRS.gov website.
- On an annual basis, send a letter to subrecipient requesting a copy of the A-133 audit report or other financial documentation if the sub-recipient received less than \$500,000 in federal funding from all sources.
- Review financial paperwork and communicate information to project managers. If necessary, request that project managers closely monitor the sub-recipient.

Project managers:

- Maintain ongoing communication with subrecipient and manage sub-recipient agreement/contract and approve invoices.
- Report sub-recipient progress on FTA quarterly milestone progress reports.
- Gather documents from sub-recipients to ensure they are complying with Title VI, if applicable.

B. Public Notification of CATS' Title VI Protections

It is CATS' responsibility to inform the public of its obligations through a public notice that details their Title VI complaint procedures. Please see the announcement from the CATS web page below.

The following notice was updated in 2017. The new notice is available in Spanish and Vietnamese and is posted in every CATS vehicle, in the lobby of the CATS operating facility and main terminal (2250 Florida Blvd. Baton Rouge, LA 70802), and on the CATS website under "Title VI" at the following address: <https://www.brcats.com/page/title-vi>.

KNOW YOUR TITLE VI RIGHTS

CATS
CAPITAL AREA TRANSIT SYSTEM

Connecting you to what matters
brcats.com

CATS 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 seeks additional information on this program or wishes to file a complaint may contact CATS Title VI Coordinator at (225) 346-5547 or by fax at (225) 926-3601.

A complaint may also be filed directly with the Federal Transit Administration by contacting the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

SI DESEA INFORMACIÓN ADICIONAL, LLAME AL (225) 346-5547.
NẾU BẠN MUỐN CÓ THÊM THÔNG TIN, XIN LIÊN LẠC (225) 346-5547.
如果您需要更多信息, 請致電 (225) 346-5547.

The CATS Title VI complaint form and procedures are accessible at the above web address and available in hard copy format at the above-mentioned CATS facility location. In addition, the form may be submitted either by mail or delivered in person at the following address: Attention Title VI Coordinator, 2250 Florida Avenue, Baton Rouge, LA 70802.

C. CATS' Procedures for Investigating and Tracking Title VI Complaints

Please refer to **Appendix C** for a full copy of the CATS Title VI complaint forms and the Title VI investigation and compliance procedures.

D. List of Active Lawsuits

There are currently no active lawsuits or complaints against CATS alleging discrimination on the basis of race, color, or national origin arising from the service provided. However, there is one active lawsuit regarding ADA compliance.

E. Compliance Review Activities

A full Title VI review was conducted during the FTA Triennial review in 2019. All deficiencies that were identified have been cleared.

F. Signed Assurances

The signed FTA assurances were submitted through the FTA's web-based grants administration system, TrAMS, on February 17, 2022 in compliance with current reporting requirements. These are included as **Appendix D**.

G. Construction Impact Analysis

Title VI requires a fixed facility (transit centers, operations facility, or yard) impact analysis for construction projects to assess any impacts to minority communities. If this information has been prepared due to an environmental impact statement, the application recipient, or sub-recipient, should reference the relevant information by documenting page numbers and date of submission to FTA.

A Title VI Equity Analysis should be conducted during the planning stages to assess where a project is located to ensure the location is selected without regard to race, color, or national origin. In addition, recipients shall engage in outreach to persons potentially impacted by the placement

of facilities. The Title VI equity analysis must compare the equity impacts of various site alternatives, and the analysis must occur before the selection of the preferred site.

Additional environmental justice principles are reflected in the DOT Order on Environmental Justice (DOT Order 5610.2(a)), which addresses Environmental Justice in Minority Populations and Low-Income Populations. The order describes the process the Department and its modal administrations (including FTA) use to incorporate environmental justice principles into programs, policies, and activities.¹⁴

As a result of FTA requirements, environmental impact analyses for fixed facilities shall include:

- A Title VI Equity Analysis conducted during the planning stages to assess if or how the location will impact minority communities and provides alternatives analysis.
- Project history and background for each construction project or service plan within the document.
- A discussion of the potential impacts on minority communities and minority-owned businesses during and after construction.
- A discussion on all potential adverse environmental impacts, such as traffic congestion, noise, air or water pollution;
- A list of minority-owned businesses and households affected by construction projects;
- A description of other significant impacts on minority communities, such as increased traffic, reduction in parking availability, etc.; and
- A description of the relocation program and/or other measures adopted by the applicant used to mitigate identified adverse social, economic, or environmental effects of the proposed construction project or service plan, all of which should include an environmental justice component.

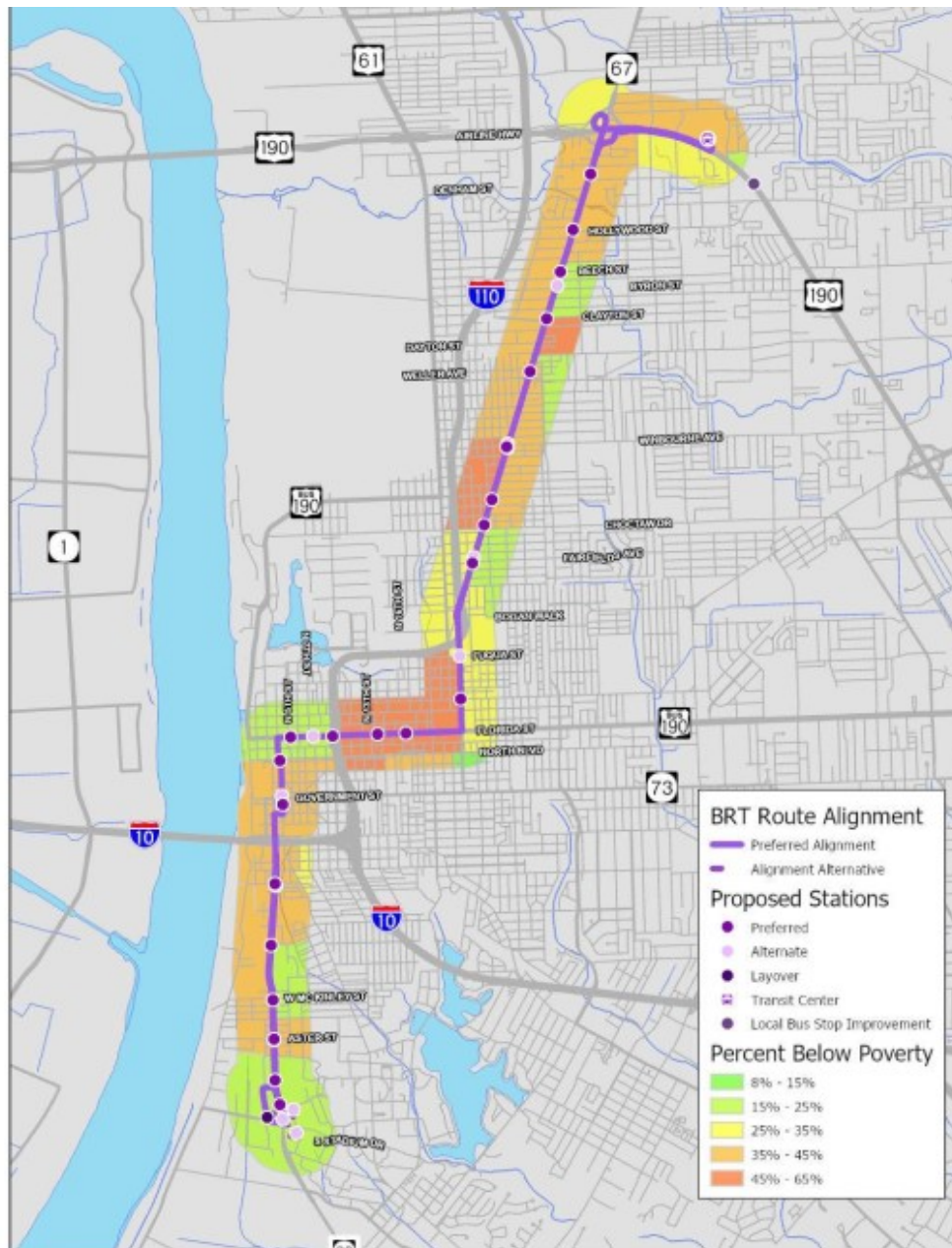
CATS had one project requiring an environmental impact analysis during the reporting period, the Plank Road Bus Rapid Transit (BRT) Project. This project has been submitted to FTA as a Categorical Exclusion. On April 28, 2020, FTA concurred that the project meets the criteria of a categorical exclusion under 23 CFR 771.118(d).

There has been no acquisition of property to date for the Plank Road BRT Project and at this time there is no planned acquisition. If acquisition is required in future phases of the project, a Facility Equity Analysis will be conducted prior to acquisition. **Figure 7 and 8** show the approximate location of the enhanced shelters for this project over low-income and minority populations respectively.

The North Transfer Center will be the northern terminus of the BRT. **Figure 9** shows the conceptual design. This location was included. A Facilities Equity Analysis (FEA) will be conducted prior to construction beginning in January 2023.

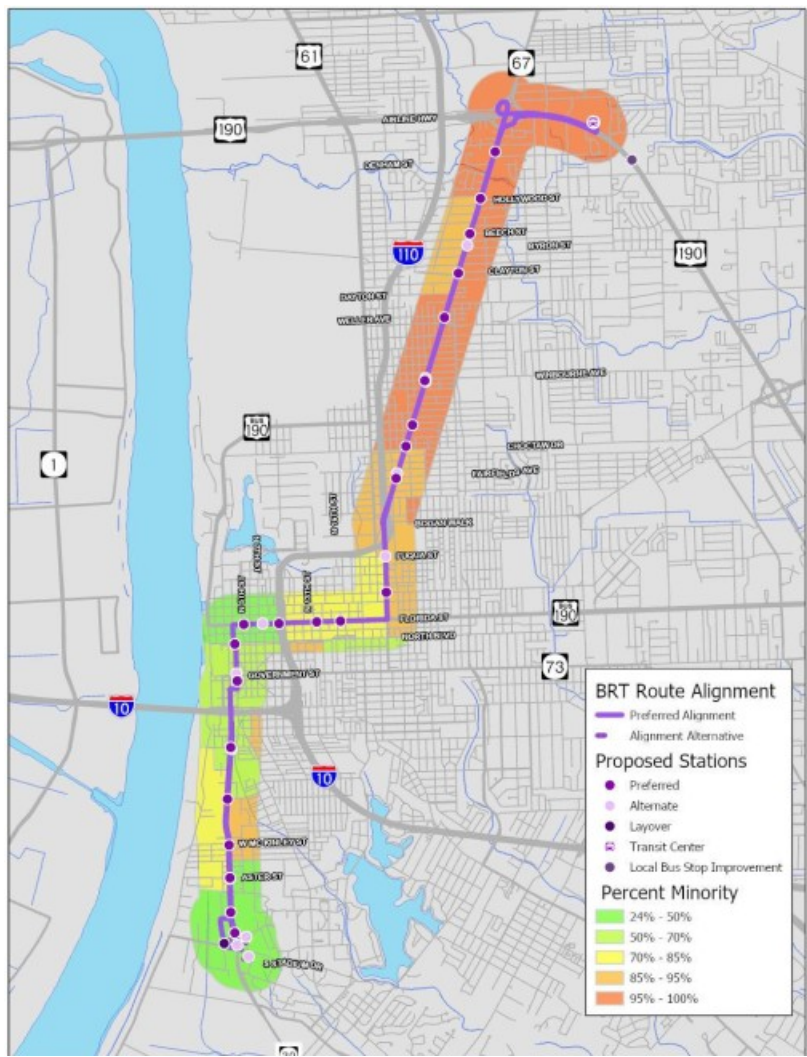
A transit Center in the City of Baker is in the planning stage at the intersection of Plank Road and Lavey Lane. **Figure 10** depicts the preliminary rendering for this project. The city of Baker currently owns this property, so CATS will not be acquiring property for that location. If federal funds are used to construct this project, then a Facility Equity Analysis will be performed.

Figure 7: Plank Road Bus Rapid Transit Corridor Low-Income Map



Source: Categorical Exclusion Documentation, 2020

Figure 8: Plank Road Bus Rapid Transit Corridor Minority Map



Source: Categorical Exclusion Documentation, 2020

Figure 9: North Transfer Center

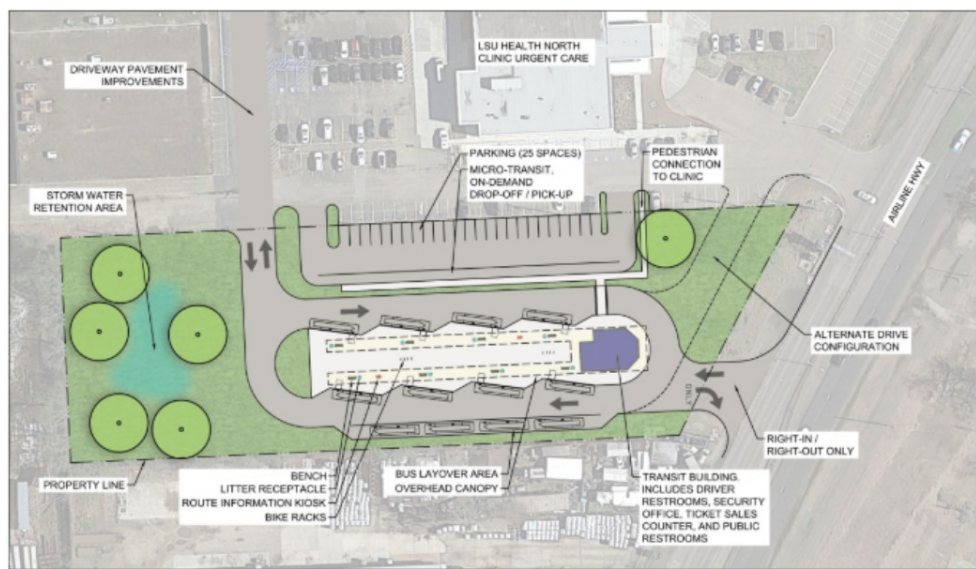


Figure 10: Baker Transit Center Rendering



H. Information Dissemination

All announcements for public hearings are given wide distribution through the use of updated mailing and e-mail address listings inclusive of community groups and concerned individuals. In addition, these notices are posted on the website and as “take-ones” in all CATS buses. The public can also dial CATS’ telephone number to get updated information regarding CATS’ business affairs.

As stated above, when CATS proposes any significant service changes, the system must meet the formal notification and public hearing requirements. To briefly summarize the requirements, CATS must provide formal notification of what changes are proposed to each jurisdiction affected by service changes and allow each respective jurisdiction the opportunity to respond. In addition, a public hearing must also be held to provide public input and feedback on the proposed service changes.

These and further requirements are contained in:

- U.S. Department of Transportation, Federal Transit Administration, Circular C 9030.1B Urbanized Area Formula Program: Grant Application Chapter 5.5 (O), “Publiccomment of Fare and Service Changes.”
- U.S. Department of Transportation, Federal Transit Administration Triennial Review Guidelines “Public Comment on Fare and Service Changes.” Washington, DC, 1997

During this dissemination period, CATS’ staff are confident that all the system riders, including minorities, senior citizens, the disabled, and limited English proficiency (LEP) populations, will be thoroughly apprised of any proposed service changes and will have opportunities to influence service-planning decisions as they arise.

Under the new Title VI guidance, transit providers with 50 or more peak period service buses are required to conduct a fare equity or service change analysis. Any impacts of these types of changes to persons of minority or low-income status as defined by the FTA are considered. CATS provides the opportunity for public comment, and this feedback is considered prior to the implementation of any fare or service changes as detailed in CATS’ fare and service change

methodology.

I. Language Assistance Plan

As with any public announcements and customer service information, CATS is well informed of the many languages used by its customer base. In addition, CATS has a Language Assistance Plan (LAP) to ensure “meaningful” access to transit services and programs for those with limited English proficiency (LEP).

According to the 2019 American Community Survey, the assessment discovered 2.58 percent of households in the CATS service area identified as LEP. In addition, the data indicates that this was highest for the Spanish and Asian, and Pacific Islander languages (see Table 3).

While the LEP customer base is minimal, CATS is implementing several language assistance measures to aid these LEP individuals. To assist its LEP patrons, CATS is implementing the following measures:

- 1.) CATS has employees who may help translate in languages, including Spanish.
- 2.) Bus schedules, maps, fare/service change announcements, and other transit publications are available in an alternative language for the Spanish and Vietnamese-speaking LEP population, if necessary.

CATS will also train its staff by providing copies of the language assistance measures contained in CATS’ LAP to all CATS employees and new hires. Part of the LAP also details notifying LEP persons of all CATS services that are available. The LAP commits to annual monitoring to ensure that the policy is followed, updated, and improved upon as needed. A copy of the entire LAP is available in **Appendix E**.

Table 3: CATS Service Area Languages

Language Spoken At Home by Household		
	Total	% of Total Population
Total Households:	120,184	100.0%
Speaks Spanish:	1,711	1.42%
Speaks Other Indo-European Languages:	252	0.21%
Speaks Asian and Pacific Island Languages:	1030	0.86%
Speaks Other Languages:	106	0.63%
Total LEP	3,099	2.58%

Source: 2019 American Community Survey (5 year), Census Bureau

J. Public Participation Plan

Purpose

The Purpose of this public participation plan (PPP) is to detail how CATS will deliver information, services, and programs that reflect the community’s values and benefit all community areas. CATS recognizes the necessity of involving the public in the planning and implementation of transit services.

CATS’ public engagement strategies are designed to provide the public with access to information about the agency’s services and provide a variety of efficient and convenient methods for receiving and considering public comments before implementing service changes. CATS also recognizes the importance of many types of stakeholders in the decision-making process. These include other units of government, metropolitan area agencies, community-based organizations, significant employers, passengers, and the general public, including low-income, minority, LEP,

and other traditionally underserved communities.

According to FTA Title VI regulatory guidance, the recipients and sub-recipients should therefore seek out and consider the viewpoints of minority and low-income populations and individuals who do not speak English fluently in the course of conducting public outreach and involvement activities. (FTA Circular 4702.1B) Furthermore, the funding recipients and sub-recipients should offer early and continuous opportunities for the public to identify the social, economic, and environmental impacts of proposed transportation decisions.

This effort includes seeking out and considering the viewpoints of minority, low-income, and LEP populations (as well as older adults and people with limited mobility) while conducting public outreach activities, consistent with Federal Transit Administration (FTA) Circular 4702.1B.

CATS may modify its public participation methods over time based on the needs of its customers and the general public. Therefore, this plan is a living document that may be updated periodically to reflect community preferences, changing demographics, transit services, and needs identified from new communication and outreach methods.

When planning for public engagement, CATS will incorporate strategies intended to promote the involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance. **Appendix F** includes the entire Public Participation Plan.

Principles

The following principles are used to develop the Public Participation Plan for CATS projects and programs:

- CATS will determine what non-English languages and other barriers may exist to public participation within the service area.
- CATS will provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to LEP populations in its service area.
- Public meetings will be held in locations that are accessible to transit riders and people with disabilities and will be scheduled at times convenient for the members of the general public.
- Public meetings and hearings will be advertised in the community where non- English languages have been identified in the updated LEP Plan. Through printed materials (e.g., interior cards, flyers, and/or comment cards) describing the proposed changes or other critical system information on-board buses, at major transit stops, local print media, and the CATS website.
- CATS will provide notification regarding the availability of language assistance at public meetings as described in the LAP.

Goals

CATS recognizes the importance of involving the public in planning and implementing transportation projects and services. Moreover, the agency believes firmly that consistent communication with riders, businesses, and visitors, alike is key to the success of CATS planning and project development efforts. Therefore, the goals of the CATS PPP are to promote meaningful opportunities for the community, including low-income, minority, and LEP populations, to be involved in the potential impacts of proposed transportation decisions by CATS. To that end, CATS has developed four goals for public participation:

- **Awareness:** Increase awareness of transportation projects in East Baton Rouge Parish and within the transit service area in the capital region.
- **Education and Outreach:** To educate the public, raise awareness, and allow public

input in the CATS transportation planning process through social media, printed materials, and other engagement methods.

- **Participation:** To provide ample opportunity for stakeholders and the general public to participate in the planning process and provide feedback on draft documents, policies, and services.
- **Partnerships:** To foster more significant partnerships with local public agencies, social service organizations, and other community groups throughout

CATS' staff will utilize the following considerations developed as part of the efforts to evaluate the racial equity implications of critical decisions:

- Have various ethnic communities/people of color been informed, meaningfully involved, and authentically represented in these processes/decisions?
- How has this been done?
- How has the feedback been considered and incorporated?
- Is there a group that benefits more than another because of this process/decision?
- What could be one unintended consequence of this process/decision for ethnic communities/communities of color?
- What action will be implemented to advance equity in this process/decision?

Methods of Public Engagement

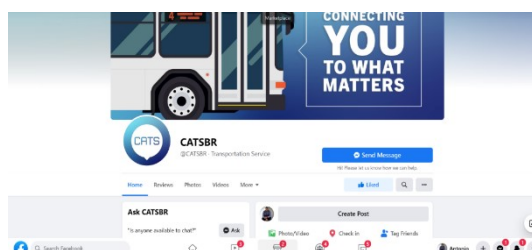
The PPP identifies a menu of available methods for providing information to CATS customers and the general public. While these communication methods are broadcast widely, they are critical tools in reaching minority and LEP populations. Staff considers several factors when designing the public engagement process, such as the magnitude of the proposed change or decision, what level of influence public opinion has over the decision, and who will be impacted by the decision. Moreover, CATS incorporates strategies intended to promote the involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with FTA Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance. All communication methods are available for translation or interpretation upon request.

CATS communicates relevant information to customers and the general public through the following methods:

- **Public notices** – These are published in the daily newspaper of record, the Advocate, and posted on the CATS website.
- **CATS' Social Media** – CATS' Facebook page, Twitter, and Instagram, are monitored and used by staff to interact with riders and can be leveraged to push out information regarding service changes and opportunities for the public to participate in the CATS decision-making process. CATS' Facebook page is used by staff to interact with riders and can be leveraged to push out information regarding service changes and opportunities for the public to participate in CATS' decision-making process.
- **CATS' Website** – CATS' website, www.brcats.com, is one of the primary sources of information for CATS' riders and the general public. Several tools are available on the site to communicate service changes and notify the public of opportunities to participate in CATS' decision-making processes. These include "Recent News" that appears as short summaries on the home page and, when selected, can lead to longer news items amongst meeting agendas, minutes, and links to route maps, customer surveys. In addition, all route schedules and many documents are available in either Spanish or Vietnamese upon request and the

website can be translated into both Spanish and Vietnamese.

- **E-mails to CATS Customers**– To date, all electronic notifications are sent out by a CATS' mass e-mail subscription service. Customers can sign up on CATS' website to receive e-mails from CATS. In addition, staff has the flexibility to target e-mail communications to subgroups of CATS ridership, such as interested members of the public about updates to project schedules, upcoming meetings or workshops, online surveys for feedback, and any other agency activities.



- **Rider Alerts** are small notices or pamphlets that fit in the existing schedule holders on the buses. These can be placed on all buses or be targeted to the routes and times that would be impacted by a change or other informational campaign.
- **Posters** at CATS Terminals: Printed signs are posted around CATS' terminal, including designated news bulletin areas within the waiting room and at the customer service window.
- **Mailers to partners**: These printed materials can be distributed via mail to CATS' partners. They can include letters to key staff at these locations and additional posters or other materials to post around their offices.
- **Paid ads** in local media: CATS can publish paid advertisements in the local newspaper of record, *The Advocate*, community newsletters, and local broadcast channels. In addition to paid advertisements can be translated into Spanish and Vietnamese upon request.
- **CATS Connects**: CATS Connects serves as an educational resource library that houses informational materials, branding assets, imagery and archived social graphics and news.
- **Customer Surveys** CATS conducts a Customer Satisfaction Survey to collect and analyze customer opinions regarding all aspects of service, update CATS customer profiles and travel patterns, and compare benchmark scores with similar transit agencies. The latest survey was administered on-board all fixed-route CATS services in the spring of 2021. CATS is administering a survey of the paratransit riders that will begin soon and is intended to be conducted each year.
- **Press releases** – Press releases aim to generate news coverage of CATS' events, changes, public meetings, etc. They are distributed via e-mail to CATS' communications contact list and posted on the News section of CATS' website
- **Public Meetings** – The backbone of CATS' public participation efforts. Public meetings are held monthly and are open to the public. There, discussions between interested parties, often including riders, can provide feedback on CATS' activities. It is a question-and-answer format and an open dialogue with a member of the CATS staff to make sure comments stay focused on the proposed change and that everyone has a chance to ask questions. Federal regulations and comments do NOT require a public meeting and do not go into the public record.
- **Public Hearings** - A public hearing is required by federal or state regulations where comments from the public go into the public record. A public hearing is governed by rules concerning who speaks when and for how long and is overseen by a CATS official. A public hearing is NOT a question-and-answer format.
- **Community Events** – CATS staff make sure that informational tables are at community events and CATS Terminals, where customers can find shared information about changes to

service, new initiatives, or community resources. CATS also found that having technical staff available at outreach events in addition to customer service and communications staff can allow for more detailed conversations with customers and members of the public.

- **CATS' Board Meetings** - The Board of Commissioners meet on the third Tuesday of each month at 4:30 p.m. at either two locations: the CATS administrative building (350 N. Donmoor St, Baton Rouge, LA 70802) or the BREC Recreation & Park Commission (3140 N Sherwood Forest Drive, Baton Rouge, LA 70814). These meetings are open to the public and include an opportunity for the public to comment on any item relating to transit. In addition, there will be cards for members of the public to complete (this applies to everyone wishing to speak at the board meetings, except the board members themselves; all employees wishing to speak must complete the cards as well).
- **Public Comments** – CATS is always open to and accepting of public comments, regardless of whether they were given as part of an organized effort. Formal public comment periods solicit comments on major public involvement efforts around an agency service or system change. Comments from comment cards are valuable for open-ended discussions. In addition, open-ended questionnaires are distributed in printed form and digital form.

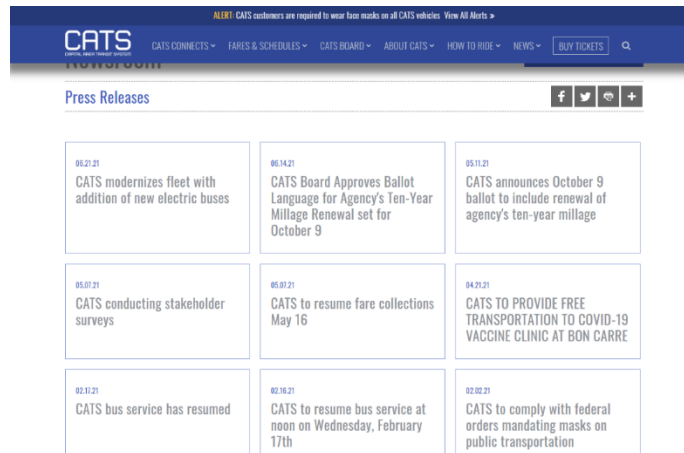
Comments are accepted anytime by the following methods. In addition, special projects may have a public outreach period where one can comment on that specific project.

- Share comments by phone at (225)389-8282,
- E-mail comments at catscustomerservice@brcats.com
- Post comments on CATS' Facebook page or Twitter page @BTRCATS
- Mail comments to CATS at 2250 Florida Blvd. Baton Rouge, LA 70802
- Share comments in person by attending a public meeting

Public Outreach (January 2021 to August 2022)

- Board meetings were held monthly to give updates on administrative matters and act on plans, contracts, updates to policies, and financial statements.
- Numerous public meetings were held to receive public input on changes in routes and schedules
- During the fall of 2016 to the fall of 2020, route adjustments and service changes were made in order to maintain route efficiency and improve service to the system.

- CATS created and distributed Customer Surveys to gather updated transit trip information and behavioral data from CATS' riders in the spring of 2021. These efforts help the agency know the needs of the riders.
- The BRT Project conducted two public meetings in May of 2022.
- The Comprehensive Operational Analysis conducted eight meetings in the month of February 2022.
- CATS Staff attended many community events that included 8 events in the month of August 2022.
- CATS Staff set up a table at the main terminal with all Title VI policies available for comment on 8-26-2022 and 8-31-2022 and received a total of 23 comments on general concerns that were forwarded to the appropriate department and added an additional 32 riders that signed up for the rider alert email list. There were no comments concerning the policies.
- In addition, CATS staff posted on social media several times with a link to the new policies and allowed for comment for 10 days. No responses were received.



COVID-19 Meeting Accommodations (March 2020)

During normal circumstances, meeting times and convenient locations for target audiences are crucial to providing meaningful opportunities for public participation. However, due to the pandemic, alternative methods of public involvement have taken place.

In accord with Act No. 302, meetings held beginning June 2020 to December 2021 were held virtually to reduce and limit the spread of COVID-19 in Louisiana and preserve the health and safety of all public members; the Governor declared the COVID-19 Public Health Emergency. In addition, he ordered that it is necessary to limit public gatherings in a single place at the same time to avoid individuals being close to one another.

As a result of the public health emergency, the limitations imposed on public gatherings and personal interactions, and the risks associated with the participation of members in a physical meeting of the Board of Commissioners for Capital Area Transit System and Public Transportation Commission as a result of this certifies that to protect the lives, property, health, safety, and welfare of the citizens of Louisiana, it is necessary to conduct the meeting for regular business via teleconference and/or online to assure the presence of a quorum of voting members.

Act No. 302 of the 2020 Regular Session of the Louisiana Legislature enacted La. R.S. 42:17.1, as subsequently amended by Act No. 43 of the 2020 Second Extraordinary Session, allows a public body to conduct business "via electronic means" if specific requirements are met.

Equity Considerations

CATS recognizes that minority and low-income populations have historically and systematically been excluded from participating in public decision-making. Moreover, due to persistent societal and cultural influences, it can be challenging to ensure diverse public participation in CATS' decision-making, despite the concerted efforts described in this plan. CATS, therefore, recognizes the need to plan carefully to design inclusive outreach processes and build in critical steps to consider whether a public participation process and its outcomes are achieving the intended

results.

Outcomes

The outcomes of public participation will be reported openly and transparently. The expectation is that, once community members have participated in a process, CATS owes it to them to say how their participation influenced the outcome. In addition, CATS should demonstrate that it explored the suggestions and recommendations of the public and considered that as part of the process.

Conclusion

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

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

CATS Staff set up a table at the main terminal with all Title VI policies available for comment on 8-26-2022 and 8-31-2022 and received a total of 23 comments on general concerns that were forwarded to the appropriate department and added an additional 32 riders that signed up for the rider alert email list. There were no comments concerning the policies.

In addition, CATS staff posted on social media several times with a link to the new policies and allowed for comment for 10 days. No responses were received.

III.Minority Representation on Decision Making Bodies

The CATS Board of Commissioners is a nine-member appointed body that sets policy direction for the operation of CATS transit services. Each member of the Board of Commissioners is appointed by the Metro Council of East Baton Rouge Parish, the governing authority for the City and Parish of East Baton Rouge. The Metro Council selects CATS board members to reflect the various communities represented by the Council and represent the community's diversity and the variety of mobility needs of the region as a whole. In order to accomplish these goals, the Metro Council utilizes a contractor to conduct a detailed analysis of each candidate's qualifications. The methodology, scoring sheets and full interviews, are sent to the Metro Council to make informed decisions regarding appointments.

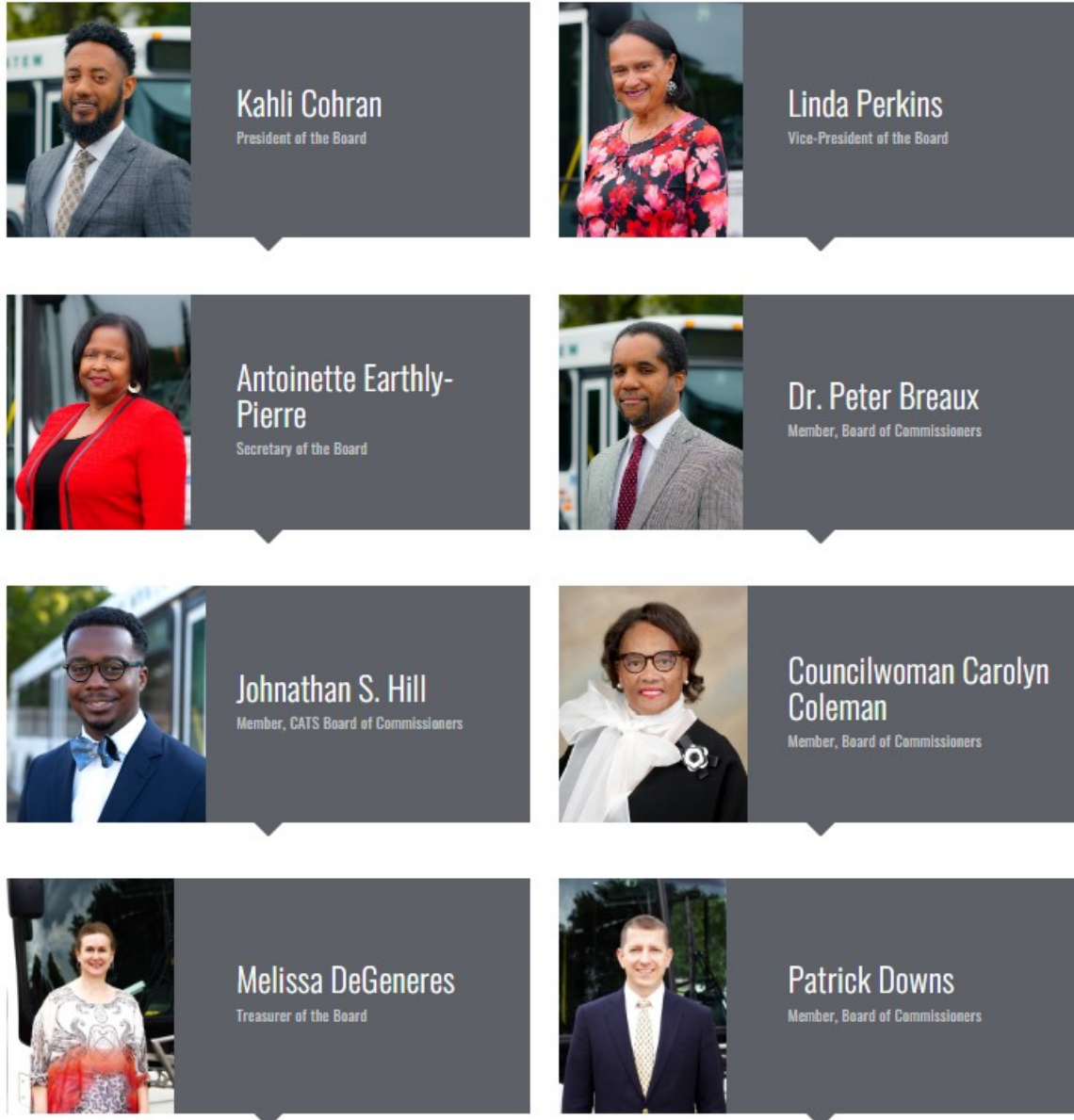
CATS' monthly Board meetings and various committee meetings provide a public venue for comments and feedback regarding any fare, service changes, or any other aspect of transit delivery. In addition, these Board meetings create a venue for our riders and members of the public at large to have an opportunity to comment publicly regarding CATS services. The members of the CATS Board of Commissioners represent the diversity of the Baton Rouge community. The ethnicity and gender of the Board members are listed below.

Total Number of Board of Commissioners as appointed by Baton Rouge Metropolitan Council: Nine (9). There is currently one vacancy on the board. **Figure 11** depicts the Commissioners.

- Black Male: Three (3)
- Black Female: Three (3)

- White Male: one (1)
- White Female: one (1)

Figure 11: CATS Board of Commissioners



IV.PROGRAM-SPECIFIC REQUIREMENTS

CATS currently operates 41 peak-hour fixed-route buses. This is down from 63 reported as part of the 2019 NTD profile. The current number of peak vehicle requirements exempts CATS from many requirements for large systems in the FTA Circular 4702.1B. However, to ensure requirements are met if the peak vehicles were to go over 50 in the future, CATS has decided to detail the system-wide service standards and policies. CATS must also evaluate adherence to those service standards and policies through a monitoring program. **Appendix G** includes the Major Service and Fare Change Policy revised in 2022.

V.Service Standards and Policies

CATS uses quantitative system-wide service standards for its fixed-route services. These standards, summarized below, were developed and implemented to help CATS achieve equity for all its transit customers in service design and operations decisions. These standards are currently under review to ensure they reflect the current CATS operating environment and presented to the CATS Board of Commissioners in the summer of 2021.

A. Service Standards

Vehicle Load

Vehicle load is the ratio of passengers on the vehicle to the number of seats on the bus. CATS measures the vehicle load at the maximum load point on each route during peak and off-peak periods. **The target is to maintain vehicle load factors at or below 133% for local routes during peak periods, 100% for local routes in off-peak, and 100% for express bus routes that operate on freeways.**

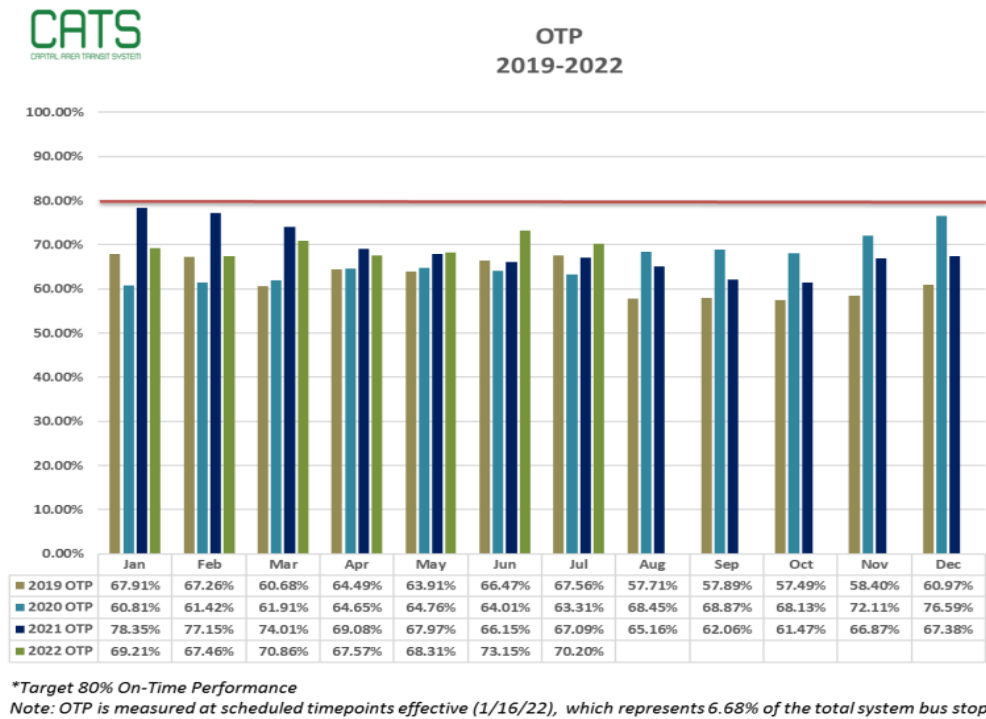
Vehicle Headway

Vehicle headway is the measurement of time between buses on a line. CATS generally operates fixed-route service with vehicle headways between 20-60 minutes during weekday peak periods and during weekday off-peak periods and weekends. **The target is 30 min Peak and 60 min off-peak for local routes and 15 min peak and 30-45 min off-peak for the upcoming BRT.**

On-Time Performance

CATS defines on-time performance for fixed-route bus trips as those trips that depart a timepoint location no earlier than 0 minutes before the time listed on printed schedules and arrives at the time point no later than 5 minutes from the scheduled time. Thus, **the agency target is 80% on time. Figure 12** depicts a historical on-time performance chart that is presented to the CATS Board of Commissions.

Figure 12: On-Time Performance

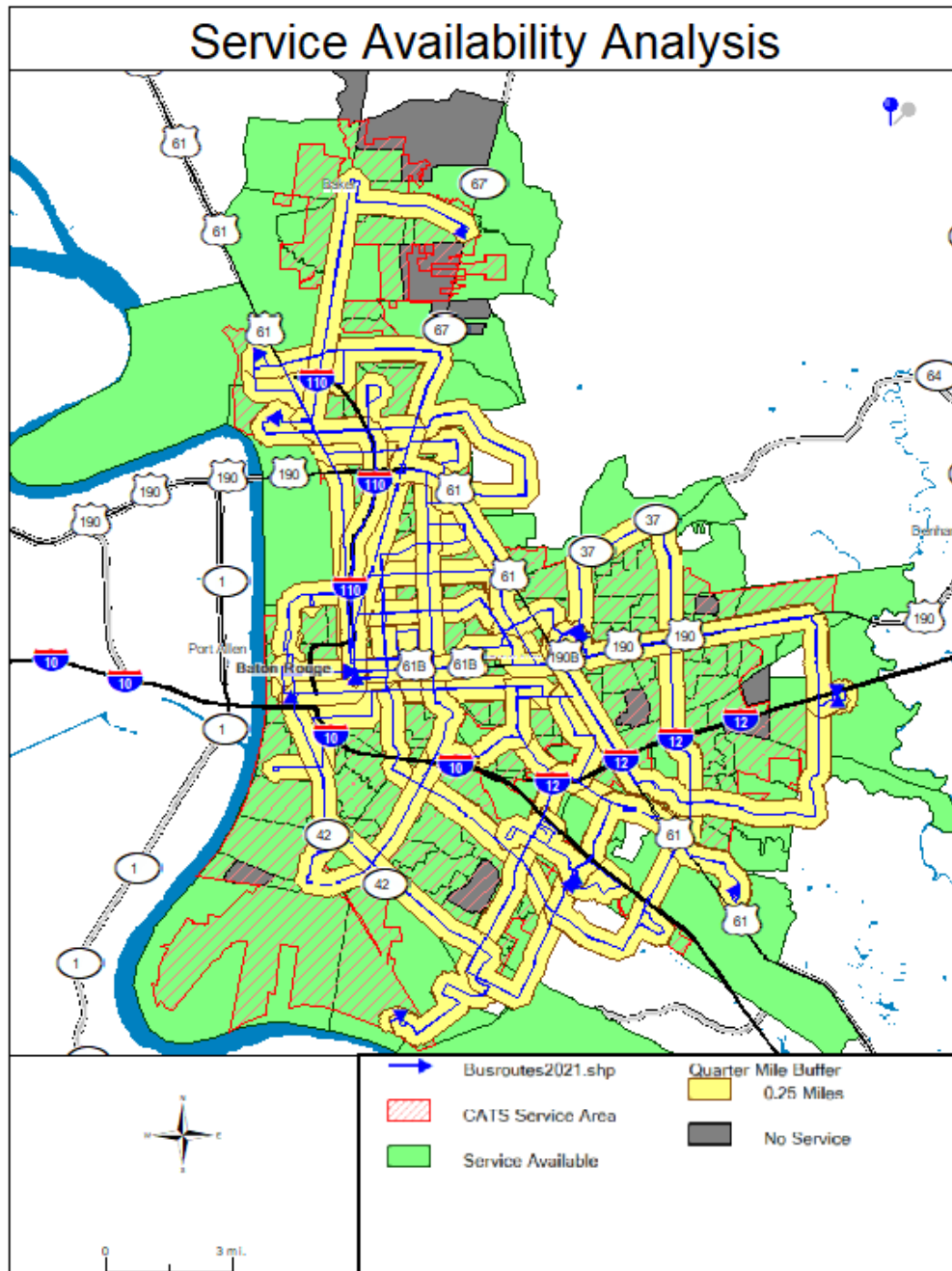


Service Availability

Service availability generally corresponds to the provision of transit service on major traffic corridors in the service area and access to high population centers and trip generators in urbanized areas. CATS provides fixed-route service primarily to people who reside within one-half to a one-quarter mile of the stops along the routes. **The target is for 95% of the population to be within ¼ mile of a bus route.**

As part of this program update, a GIS analysis was conducted measuring how many of the 239 block groups intersect the ¼ mile buffer of the existing fixed-route service. **Figure 13** illustrates that 228 of 239 block groups intersect a ¼ mile buffer.

Figure 13: Service Availability



B. Service Policies

CATS uses quantitative system-wide service policies for its fixed-route services. These policies, summarized below, were developed and implemented to help CATS better achieve equity for all its transit customers in service design and operations decisions.

Distribution of Transit Amenities

Generally, bus stops are placed no more than 1,000 feet (approximately 0.2 miles) apart (stops may be closer in commercial and downtown Baton Rouge areas). Transit amenities such as bus shelters are provided as a convenience to passengers. Bus shelters are placed at selected bus stops within the CATS service area, with priority given to locations that have a high passenger volume, serve multiple bus routes, and are located near schools, hospitals, and other activity centers. **Table 4** depicts the amenities daily boarding standard. The City of Baton Rouge also has contracted with bus bench advertising companies to place bus benches at various locations around the city. CATS does not have jurisdiction regarding the placement of these bus benches.

CATS has established a policy that all new amenities will follow the following minimum requirements to ensure equity throughout the system.

Table 4: Placement of Amenities

Amenities	Average Boardings
Stop	1+ average daily boardings
Bench & Trash Receptacle	5 - 15+ average daily boardings
Shelter	16 - 25 average daily boardings
Enhanced Shelter	26+ average daily boardings

Vehicle Assignment

With regards to vehicle assignment, CATS assigns vehicles on an “available” basis with no assigned vehicles to specific routes. The exception is an electric branded vehicle will be used on the Downtown circulator when it is reinstated for revenue service. This ensures that no geographic location is preferred over another.

CATS strives to supply its customer base with well-maintained vehicles that are ADA compliant by intending to replace all buses after their 12-year life span. A complete inventory of the fleet and replacement plan as of February 2021 is included in Appendix A.

VI.Minority Route Methodology

CATS uses data from the 2019 5-year ACS data to define bus routes that predominately serve minority and /or low-income block groups. CATS classifies a block group as a minority block group if the percentage of minority residents in that block group is higher than the percentage of the CATS service area as a whole (60.77%). The block group is designated low income if the low-income population is greater than that of the service area (27%). A route is designated as a minority route or low-income route if more than 50% of the route serves a minority or low-income, block group. As shown in **Table 5**, many routes are designated as both minority and low income.

Table 5: Minority and Low-Income Routes

Route #	Route Name	Minority Route	Low Income Route	Average Monthly Ridership
8	Gus Young / BRCC	x	x	
10	Scenic Hwy / Southern Univ	x	x	
11	Northside Circular	x	x	
12	Government St / Jefferson Hwy	-	-	
14	Thomas Delpit Dr	x	x	
15	Blount Road	x	x	
16*	Capitol Park Shuttle	n/a	n/a	
17	Perkins Road / Mall of LA	-	-	
18	LSU / Cortana Mall	-	-	
20	North Acadian Thruway	x	x	
21	Fairfields Ave / Cortana Mall	x	x	
22	Winbourne Ave	x	x	
23	Foster Drive	x	x	
41	Plank Road	x	x	
44	Florida Blvd / Cortana Mall	x	x	
46	Cortana / Gardere / L'Auberge	-	-	
47	Highland Road	-	-	
54	Airline / Southern University	x	x	
57	Sherwood Forest Blvd	-	-	
58	Coursey / O'Neal Lane	-	-	
59	East Florida / O'Neal Lane	x	-	
60	Our Lady of the Lake	-	-	
70	Baker Limited	x	x	
72*	Florida Boulevard Limited Stops	n/a	n/a	
80*	Southern University Shuttle	n/a	n/a	

Note: * Service suspended.

VII. Level of Service Analysis

For the purposes of our analysis, a sample of routes was analyzed that are categorized as minority routes and non-minority routes. In addition, these routes included those with some of the highest ridership in the CATS bus system. **Table 6** consists of the sampled routes for purposes of conducting both a Level of Service Analysis and a Quality of Service Analysis.

Table 6: CATS Sampled Minority and Non-Minority Routes

Route Number	Route Name	Minority Route?	Low-Income Route?	Average Monthly Ridership*
10	Scenic Hwy.-Southern Univ.	Yes	Yes	6,897
20	North Acadian	Yes	Yes	9,632
41	Plank Rd.	Yes	Yes	18,361
44/72	Florida Blvd.	Yes	Yes	35,527
17	Perkins Rd.	No	Yes	11,890
18	LSU-Cortana Mall	No	Yes	8,154
47	Highland Rd.	No	Yes	25,543
58	Coursey-O'Neal	No	Yes	4,541

*CATS November 2019 Ridership Data

C. Average Monthly Stop Loads

The Average Monthly Passenger Load per Stop was calculated and analyzed for each bus route. Total monthly passenger loads for CATS buses serving bus stops located along each sampled route were reviewed, with the results compared for Minority and Non-Minority routes. Minority routes showed average loads of 209.5 passengers per stop per month, while the Non-Minority routes showed average loads of 124.1 passengers per stop.

D. Bus Stop Spacing

Another factor calculated was the average stop spacing with respect to each sampled route. CATS' service standards indicate an average stop spacing standard of approximately 1,000 feet (approximately 0.20 miles). Minority routes showed an average mileage between stops of 0.17 miles, while Non-Minority routes showed an average of 0.25 miles.

E. Headways

CATS' service standards indicate an average headway standard of 15-60 minutes during peak and off-peak periods. Sampled Minority routes showed average headways of 28 minutes in peak periods and 38 minutes in off-peak periods, while sampled Non-Minority routes showed average headways of 36.3 minutes in peak periods and 50.8 minutes off-peak periods.

The analysis indicates that there are no disparate impacts in service frequency to minority populations in the service area for the level of service assessment. The analysis of bus stop access shows that bus stops are provided at a greater density on Minority routes than on the Non-Minority routes sampled. Also, given the greater service frequency for Minority routes than Non-Minority routes, the analysis shows no disparate impacts in service frequency to minority populations in the service area. The analysis did indicate that Minority routes experienced higher average passenger loads than Non-Minority routes; however, this can be attributed to the sampled Non-Minority routes having longer route lengths and more bus stops in number. Monthly ridership on the sampled Minority and Non-Minority routes showed that Minority ridership was higher (70,417) than Non-Minority routes (50,128), but given the higher bus stop access per route mile for Minority routes, there is no finding of disparate impact in the level of service provided.

Data for all the variables calculated and explained above is presented in **Tables 7 and 8**.

Table 7: CATS Level of Service Analysis – Passenger Loads and Bus Stop Spacing

Bus Route	Minority Route?	Bus Stops on Route	Avg. Monthly Ridership	Average Load per Stop per Month	*Total Route Miles	Avg. Bus Stop Spacing	Avg. No. of Bus Stops per Route Mile
10	Yes	70	6,897	98.5	13.1	0.18	5.3
20	Yes	108	9,632	89.2	15.3	0.14	7.1
41	Yes	79	18,361	232.4	11.7	0.15	6.8
44/72	Yes	85	35,527	417.9	18.1	0.20	4.7
Category Avg.	Yes			209.5		0.17	6.0
17	No	80	11,890	148.6	16.6	0.20	4.8
18	No	87	8,154	93.7	27.5	0.27	3.2
47	No	138	25,543	185.1	26.1	0.19	5.3
58	No	66	4,541	68.8	26.1	0.33	2.5
Category Avg.	No			124.1		0.25	4.0

*Represents round-trip mileage

Table 8: CATS Level of Service Analysis – Average Headways

Bus Route	Minority Route?	Peak Headway (min.)	Off-Peak Headway (min.)
10	Yes	30	50
20	Yes	30	50
41	Yes	20	30
44	Yes	30	30
72	Yes	30	30
Avg. Headway	Yes	28	38
17	No	25	53.3
18	No	30	60
47	No	30	30
58	No	60	60
Avg. Headway	No	36.3	50.8

VIII. Quality of Service Analysis

A. Passenger Access

In conjunction with Minority and Non-Minority routes, an assessment was made of passenger access from these routes to the top three traveled destinations in the transit system to assess the quality of service in the CATS transit system. These locations are the CATS Main Transit Terminal,

the Cortana Mall Transit Hub, and the Earl K. Long Transit Hub. To analyze this data fairly, the approximate midpoint of each sampled route was identified, and the travel time, fare paid, and routes taken from each intersection to the top destinations were calculated. Travel times were calculated using CATS schedules. **Tables 9, 10, and 11** depict this data.

Table 9: Quality of Service Analysis - Travel to CATS Main Transit Terminal

Bus Route	Minority Route?	Bus Stop	Travel Time (min.)	Fare Paid	Routes Traveled
10	Yes	Scenic & Evangeline	10	\$1.75	10
20	Yes	Prescott & Foster	18	\$1.75	20
41	Yes	Plank & Evangeline	13	\$1.75	41
44	Yes	Florida & Foster	6	\$1.75	44
72	Yes	Florida & BRCC	6	\$1.75	72
17	No	Perkins & College	16	\$1.75	17
18	No	Lee & Perkins to Lee & Lake After Hours transfer to Highland & Lee	39	\$2.00	18, 47
47	No	Highland & Lee	24	\$1.75	47
58	No	Coursey & Sherwood to Cortana Mall transfer to 44	50	\$2.00	58, 44

Table 10: Quality of Service Analysis - Travel to Cortana Mall Transit Hub

Bus Route	Minority Route?	Bus Stop	Travel Time (min.)	Fare Paid	Routes Traveled
10	Yes	Scenic & Evangeline to CATS Terminal transfer to 44	46	\$2.00	10, 44
20	Yes	Prescott & Foster to CATS Terminal transfer to 44	48	\$2.00	20, 44
41	Yes	Plank & Evangeline to CATS Terminal transfer to 44	Peak - 58 Off Peak - 48	\$2.00	41, 44
44	Yes	Florida & Foster	16	\$1.75	44
72	Yes	Florida & BRCC	10	\$1.75	72
17	No	Perkins & College to CATS Terminal transfer to 44	Peak - 43 Off Peak - 53	\$2.00	17, 44
18	No	Lee & Lake After Hours	22	\$1.75	18
47	No	Highland & Lee to CATS Terminal transfer to 44	56	\$2.00	47, 44
58	No	Coursey & Sherwood	11	\$1.75	58

Table 11: Quality of Service Analysis - Travel to Earl K. Long Transit Hub

Bus Route	Minority Route?	Bus Stop	Travel Time (min.)	Fare Paid	Routes Traveled
10	Yes	Scenic & Evangeline to Scenic & 72 nd transfer to 72 nd & Scenic	22	\$2.00	10, 11
20	Yes	Prescott & Foster	11	\$1.75	20
41	Yes	Plank & Evangeline	13	\$1.75	41
44	Yes	Florida & Foster to CATS Terminal transfer to 20	41	\$2.00	44, 20
72	Yes	Florida & BRCC to CATS Terminal transfer to 20	35	\$2.00	72, 20
17	No	Perkins & College to CATS Terminal transfer to 20	67	\$2.00	17, 20
18	No	College & Perkins to Corporate & Energy Dr - E transfer to Corporate & Energy Dr - W	44	\$2.00	18, 23
47	No	Highland & Lee to CATS Terminal transfer to 20	65	\$2.00	47, 20
58	No	Coursey & Sherwood to Cortana Mall transfer to 54	70	\$2.00	58, 54

The analysis reveals that all routes are able to reach the top three destinations for CATS passengers within a 70-minute travel time. Because two of the top three destinations are located closer to Minority census tracts (CATS Main Transit Terminal and Earl K. Long Transit Hub), the average travel times are relatively shorter than minority census tracts. The travel times to the Cortana Mall Transit Hub are relatively similar to Minority and Non-Minority routes. The average fares paid by travelers on both Minority and Non-Minority routes to major destinations are similar, particularly due to the fact that most destinations are accessible with either a direct trip or with one transfer.

B. Passenger Loads

CATS' policy is to achieve a passenger load to seat ratio of 1.33 for fixed-route services operating in local service and 1.00 for fixed-route services operating express service on freeway segments. A review of passenger loads on all CATS sampled bus routes indicate that CATS service does not experience passenger overloads based on the passenger load standards.

As a result of both the Level of Service and Quality of Service Analyses, it would appear that Minority bus routes are receiving an equitable quality of service compared to Non-Minority bus routes in the CATS system.

IX. CONCLUSION

This report fulfills the compliance reporting requirements for Title VI as detailed in FTA Circular 4702.1B. The report detailed CATS' services, long-range planning efforts, and general reporting requirements mentioned in the circular. The program-specific requirements were addressed with a profile of their service standards and policies, along with a description of the CATS bus fleet.

The results demonstrate that CATS services a diverse population and supplies public transportation equitably to all classified races, ethnicities, and income levels.

APPENDIX A: Vehicle Inventory

Capital Area Transit System
Fleet Management Plan
Paratransit

Paratransit													
Vehicle Year	Model	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
2016	12 Passenger Van (3 Wheelchairs)	7	7										
2017	12 Passenger Van (3 Wheelchairs)												
2018	12 Passenger Van (3 Wheelchairs)												
2019	12 Passenger Van (2 Wheelchairs)	4	4	4	4								
2020	12 Passenger Van (2 Wheelchairs)	11	11	11	11	11	5						
2021	12 Passenger Van (2 Wheelchairs)												
2022	12 Passenger Van (2 Wheelchairs)			7	7	7	7	7					
2023	12 Passenger Van (2 Wheelchairs)												
2024	12 Passenger Van (2 Wheelchairs)					4	4	4	4	4			
2025	12 Passenger Van (2 Wheelchairs)						6	6	6	6	6		
2026	12 Passenger Van (2 Wheelchairs)							5	5	5	5	5	
2027	12 Passenger Van (2 Wheelchairs)								7	7	7	7	7
2028	12 Passenger Van (2 Wheelchairs)											4	4
2029	12 Passenger Van (2 Wheelchairs)										4		6
2030	12 Passenger Van (2 Wheelchairs)											6	
2031	12 Passenger Van (2 Wheelchairs)												5
2032	12 Passenger Van (2 Wheelchairs)												
Paratransit Vehicles - Available		22	22	22	22	22	22	22	22	22	22	22	22
Paratransit Vehicles - Needed		18	18	18	18	18	18	18	18	18	18	18	18
Spare Ratio %		18.2%	18.2%	18.2%	18.2%	18.2%	18.2%	18.2%	18.2%	18.2%	18.2%	18.2%	18.2%
Age		1.5	2.5	1.5	2.5	2.6	2.3	1.9	1.3	2.3	2.4	2.2	2.4

Blue highlight mean to buy vehicle 1.45455

Notes

- * The fleet management plan is based on 2018 operational levels.
- * Seat belts are recommended on paratransit vehicles.
- * Board's policy is to replace ADA vehicles periodically and if possible every year.

Capital Area Transit System
Revised 2/12/21
Fleet Management Plan
Fixed Route Buses - Base Scenario

Vehicle Year	Model	Sub-fleets	Electric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
2011	Bus - Gillig Low Floor (ARRA)	6	No	6	6	6	6	0	0	0	0	0	0	0	0
2013	Bus - Gillig Low Floor (ARRA)	1	No	1	1	1	1	1	1	0	0	0	0	0	0
2014	Bus - Gillig Low Floor	11	No	11	11	11	11	11	11	11	0	0	0	0	0
2015	Bus - Gillig Low Floor	5	No	5	5	5	5	5	5	5	5	0	0	0	0
2016	Bus - Gillig Low Floor	12	No	12	12	12	12	12	12	12	12	12	7	6	0
2017	Bus - Gillig Low Floor	12	No	12	12	12	12	12	12	12	12	12	12	8	8
2018	Bus - Gillig Low Floor	8	No	8	8	8	8	8	8	8	8	8	8	8	8
2019	Electric Bus - BYD	3	Yes	3	3	3	3	3	3	3	3	3	3	3	3
2021	Electric Bus - BYD	3	Yes		3	3	3	3	3	3	3	3	3	3	3
2022	Standard Diesel Bus														
2021	Electric 30' Bus - DT Circulator LEASED	3	Yes		3	3									
2023	Electric 30' Bus - DT Circulator	3	Yes				3	3	3	3	3	3	3	3	3
2023	Bus - Gillig Low Floor	4	No				4	4	4	4	4	4	4	4	4
2024	Bus - Gillig Low Floor	3	No					3	3	3	3	3	3	3	3
2022	Electric Bus - BYD	3	Yes			3	3	3	3	3	3	3	3	3	3
2025	Standard Diesel Bus														
2026	Standard Diesel Bus														
2027	Electric Bus	5	Yes								5	5	5	5	5
2028	Electric Bus	5	Yes									5	5	5	5
2029	Electric Bus	5	Yes										5	5	5
2030	Electric Bus	5	Yes											5	5
2031	Standard Diesel Bus	5	Yes												5
2024	Expansion Electric Buses														
2026	Expansion Electric Buses														
2027	Expansion Electric Buses														
2029	Expansion Electric Buses														
	Baseline peak vehicle requirement			44	44	44	44	44	44	44	44	44	44	44	44
	Expansion peak vehicle requirement				2	2	2	6	6	6	6	6	6	6	6
	Total peak vehicle requirement			44	46	46	46	50	50	50	50	50	50	50	50
	Fixed Route Vehicles - Total			58	64	67	71	68	68	67	61	61	61	61	60
	Spare ratio			31.8%	39.1%	45.7%	54.3%	36.0%	36.0%	34.0%	22.0%	22.0%	22.0%	22.0%	20.0%
	Average age			4.4	4.9	5.6	6.2	6.3	7.3	8.1	7.6	7.5	7.4	7.3	6.9
	Electric Vehicles			3	6	9	12	12	12	12	17	22	27	32	32
	Electric percent of fleet			5.2%	9.4%	13.4%	16.9%	17.6%	17.6%	17.9%	27.9%	36.1%	44.3%	52.5%	53.3%

Spares	14	18	21	25	18	18	17	11	11	11	11	10
Spare ratio	31.8%	39.1%	45.7%	54.3%	36.0%	36.0%	34.0%	22.0%	22.0%	22.0%	22.0%	20.0%
Buses needed for spare ratio	-5	-8	-11	-15	-8	-8	-7	-1	-1	-1	-1	0

APPENDIX B: Microtransit Service Equity Analysis

APPENDIX C: CATS TITLE VI COMPLAINT INVESTIGATION PROCEDURES



CATS Title VI Complaint Process



CATS Title VI Complaint Process

CATS grants all citizens equal access to all its transportation services. It is further the intent of CATS that all citizens are aware of their rights to such access. This process document is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of CATS programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI

Title VI is a section of the Civil Rights Act of 1964 requiring 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.” Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

Who are Limited English Proficient Persons?

Persons who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English can be limited English proficient, or “LEP.” These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Different treatment based on a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

How do I file a complaint?

If you believe that you have received discriminatory treatment by CATS on the basis of your race, color or national origin, you have the right to file a complaint with CATS’ Title VI Coordinator. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident.

Methods of filing a Complaint

The preferred method is to file your complaint in the online complaint form located at www.brcats.com/page/titlevi

You can obtain a hard copy of the Title VI Complaint Form by calling (225) 342-5548 or email TitleVIComplaints@brcats.com.

The form can be mailed to:

Title VI Coordinator Capital Area Transit System Title VI Coordinator
2250 Florida Boulevard
Baton Rouge, LA, 70802

In addition, a complaint can be filed with the Federal Transit Administration by completing the [FTA complaint form \(PDF\)](#). The complaint form should be emailed to FTACivilRightsCommunications@dot.gov with “FTA complaint form” included in the subject line.

Alternatively, FTA complaints may be mailed to:

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

Should a complaint be filed with CATS and an external entity simultaneously, the external complaint shall supersede the CATS complaint and the CATS complaint procedures will be suspended pending the external entity’s findings.

Investigations

Within 10 working days of receipt of the formal complaint, the Title VI Coordinator will notify the complainant and begin an investigation (unless the complaint is filed with an external entity first or simultaneously).

The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

The investigation will be conducted and completed within 90 days of the receipt of the formal complaint.

Based upon all the information received, an investigation report will be written by the Title VI Coordinator for submittal to the Chief Executive Officer.

The complainant will receive a letter stating that final decision by the end of the 90-day time limit.

The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the Federal Transit Administration (FTA).

If the complainant is dissatisfied with the determination and/or resolution set forth by CATS, the same complaint may be submitted to the FTA for investigation.

A copy of the complaint and CATS' investigation report/letter of finding and final remedial action plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.

A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.



APPENDIX D: CATS FTA TITLE VI CERTIFICATIONS AND ASSURANCES

**FEDERAL FISCAL YEAR 2022 CERTIFICATIONS AND ASSURANCES FOR FTA
ASSISTANCE PROGRAMS**

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Capital Area Transit System

The Applicant certifies to the applicable provisions of all categories: (check here) ✓.

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	_____
02 Public Transportation Agency Safety Plans	_____
03 Tax Liability and Felony Convictions	_____
04 Lobbying	_____
05 Private Sector Protections	_____
06 Transit Asset Management Plan	_____
07 Rolling Stock Buy America Reviews and Bus Testing	_____
08 Urbanized Area Formula Grants Program	_____
09 Formula Grants for Rural Areas	_____
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	_____
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	_____

Certifications and Assurances

Fiscal Year 2022

- 12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs
- 13 State of Good Repair Grants
- 14 Infrastructure Finance Programs
- 15 Alcohol and Controlled Substances Testing
- 16 Rail Safety Training and Oversight
- 17 Demand Responsive Service
- 18 Interest and Financing Costs
- 19 Cybersecurity Certification for Rail Rolling Stock and Operations
- 20 Tribal Transit Programs
- 21 Emergency Relief Program

CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

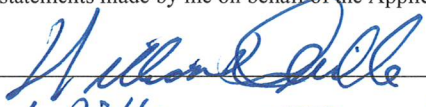
Name of the Applicant: Capital Area Transit System

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.


Signature  Date: 2/17/22
 Name William J. Deville Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Capital Area Transit System

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature  Date: 2/17/22
 Name Dedrick H. Moore Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

APPENDIX E: Language Assistance Plan CATS



Language Assistance Plan
CAPITAL AREA TRANSIT SYSTEM
BATON ROUGE, LOUISIANA
July 2021

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I. Introduction

This Language Assistance Plan (LAP) has been prepared to address the Capital Area Transit System's (CATS) responsibilities as a recipient of Federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person 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.”

CATS is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services based on race, color, or national origin. This plan was developed to guide CATS in its administration and management of Title VI related activities.

A. Plan Summary

CATS has developed this LAP to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided. As defined in Executive Order 13166, LEP persons do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. To prepare this plan, CATS undertook the U.S. Department of Transportation's four-factor LEP analysis which considers the following factors:

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

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

B.Four-Factor Analysis

- 1.The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CATS program, activity, or service.

CATS reviewed 2019 5-year American Community Survey block group data. Those 239 block groups intersecting the corporate limits of Baton Rouge and Baker were considered the CATS service area. The review indicated that the total service area has a total of 120,184 households. Of those households (2.58%) speak English “not well” or “not at all.” Spanish speaking households are 1.42% of overall households, and Asian speaking households are 0.86%, and others are 0.84%, as shown in Table 1 below. Figure 1 depicts the block groups with 5%, or more Spanish LEP households, and Figure 2 depicts block groups with 5% or more Asian LEP households.

Table 1: LEP Households by Language Spoken at Home

	Total	% of Total
Total Households:	120,184	100.00%
Speaks Spanish:	1,711	1.42%
Speaks Other Indo-European Languages:	252	0.21%
Speaks Asian and Pacific Island Languages:	1030	0.86%
Speaks Other Languages:	106	0.63%
Total LEP	3,099	2.58%

Source: Census 5-year American Community Survey 2019

Figure 1: Spanish LEP Block Groups

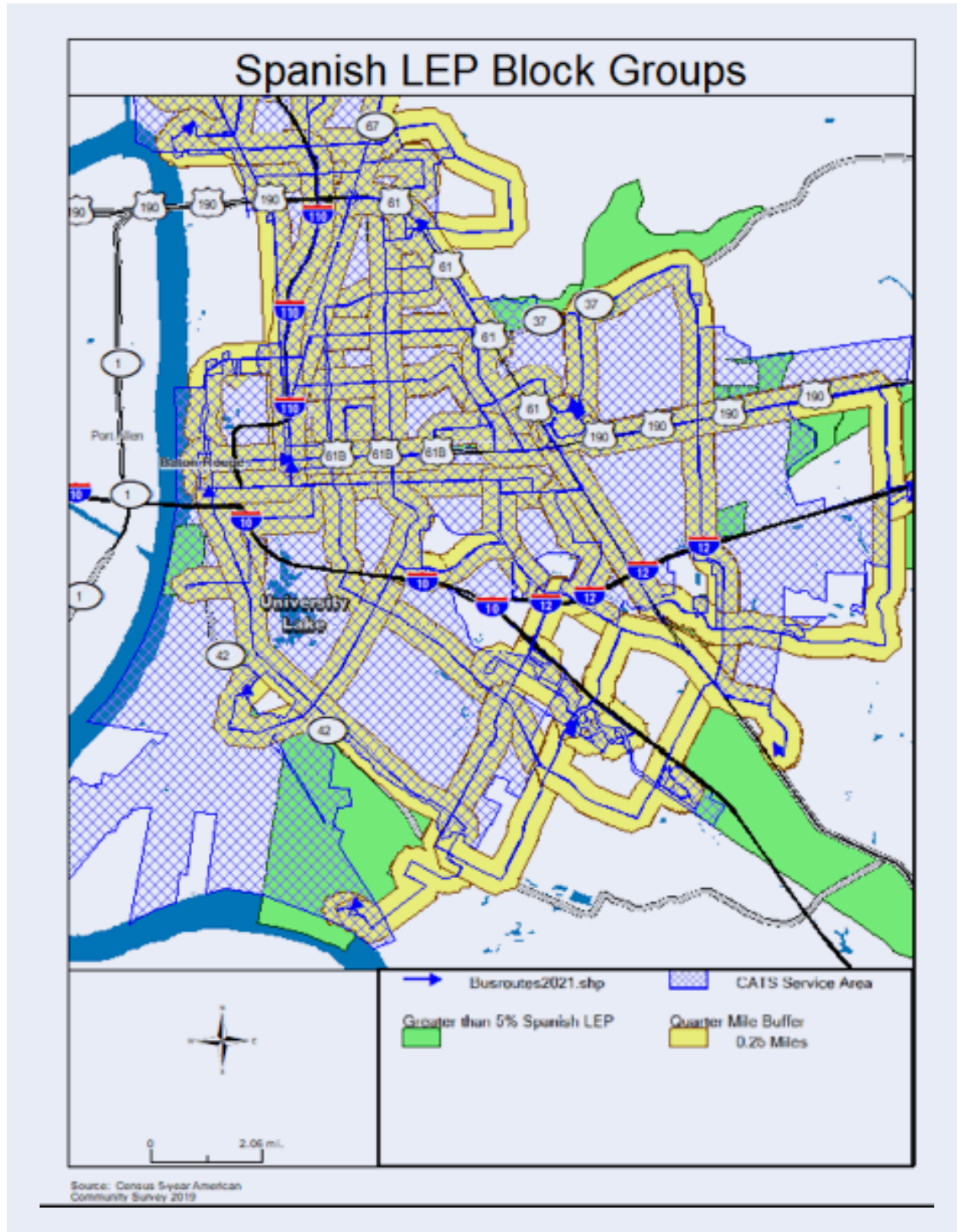
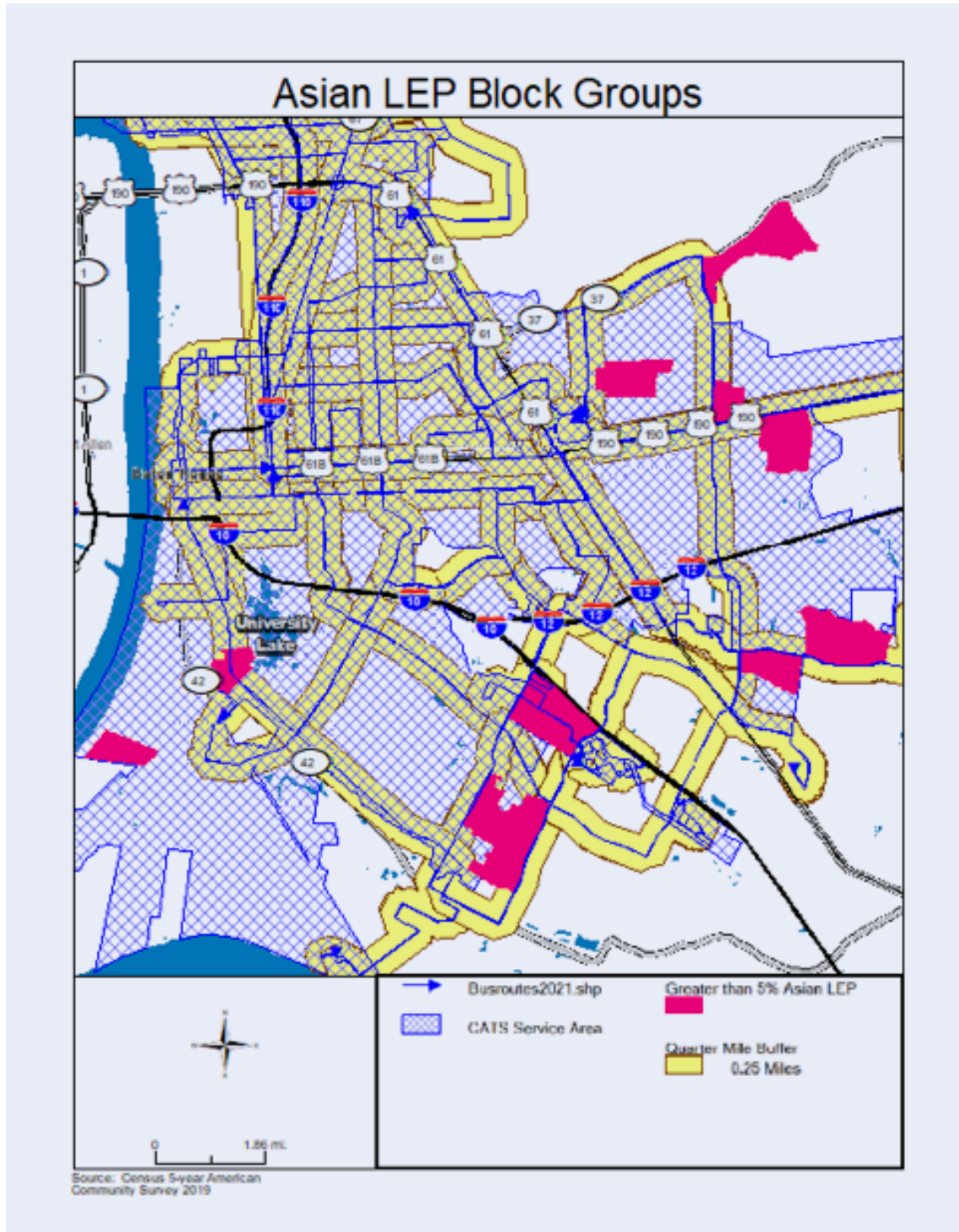


Figure 2: Asian LEP Block Groups



2. The frequency with which LEP persons encounter CATS programs, activities, or services. CATS reviewed the frequency with which staff has contact with LEP persons. This includes reviewing phone inquiries. Historically, LEP contacts have been relatively rare. In the review of phone inquiries in the CATS Customer Care Department, there have been approximately 575 calls received by the Customer Care Department between May and October 2019. Customer Care representatives maintain a record of callers that request language assistance or have difficulty communicating in English. In the last six months, there were four documented requests for language assistance. Also, a review of the CATS website analytics for language assistance requests indicated that 0.05% of website visitors requested language assistance since 2017.
3. The nature and importance of programs, activities, or services provided by CATS to the LEP population. Active participation of all community groups is vital for the success of public transportation. CATS provides a range of essential transportation options to the community through its fixed-route and paratransit services. Riders use CATS services for their multiple travel needs within the community, including trips to work, school, job interviews, grocery stores, and retail shops, medical offices, community service agencies, and more. An example of how CATS facilitates this is that all public schedules are available in Spanish and Vietnamese.
4. The resources available to CATS and overall cost to provide LEP assistance. CATS reviewed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise and evaluated resources that could be used for outreach and translation efforts. Based on the four-factor analysis, CATS developed its LAP as outlined in the following sections.

C. Language Assistance Program

A person who does not speak English as their primary language and has a limited ability to read, write, speak or understand English may be an LEP person and may be entitled to language assistance with respect to CATS' programs and activities. Language assistance can include interpretation, which means an oral or spoken transfer of a message from one language into another language, and/or translation, which means the written transfer of a message from one language into another language. CATS will determine when interpretation and/or translation are needed and are reasonable.

How the CATS staff may identify an LEP person who needs language assistance is outlined below:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When CATS sponsors an event, staff will personally greet participants as they arrive. By informally engaging participants in a conversation, it is possible to gauge each attendee's ability to speak and understand English.
- Have Census Bureau Language Identification Flashcards ("I Speak Cards") available at CATS events near the registration table. Individuals self-identifying as persons not proficient in English may not be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.

- Have Census Bureau Language Identification Flashcards (“I Speak Cards”) available for bus operators and customer service desk staff to assist them with identifying language assistance needs.
- Network with local community service centers that provide services to LEP individuals and seek opportunities to provide information on transit services.
- Vehicle operators and other front-line staff, including bus operators, supervisors, customer service representatives, clerical staff, and dispatchers, will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

Language Assistance

CATS strives to offer the following language assistance measures to LEP individuals, that is, persons who speak English “not well” or “not at all:”

- All CATS public schedules are translated and available upon request in both Spanish and Vietnamese.
- The CATS Title VI Policy and CATS staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
- If a client asks for language assistance and CATS determines that a client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, CATS will provide language assistance in the LEP client’s preferred language. CATS has the discretion to determine whether language assistance is needed and the type of language assistance necessary to provide meaningful access.
- CATS will periodically assess client needs for language assistance based on requests for interpreters and/or translation and the literacy skills of the clients.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then attempt to access language assistance at one or more of the available resources identified under the section “Formal Interpreters” below.
- Consider the use of a computerized translation tool that can help translate the CATS website into any language in which LEP persons are fluent.
- Translation of any CATS policies is available upon request.

Safe Harbor Stipulation

Federal law provides a “Safe Harbor” stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A “safe harbor” means that if a recipient provides written translations under certain circumstances, such action will be considered strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-

intensive, four-factor analysis. For example, even if a safe harbor is not used, if the written translation of a particular document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as practical oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons qualified to be served or likely to be affected or encountered. CATS' translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

In the CATS' service area, the Spanish and Vietnamese language groups constitute the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided under the safe harbor standard.

CATS has determined that while the demographics of the CATS service area include some groups of limited English proficient individuals, there has been no report by CATS bus operators of language difficulty or requests from riders for alternative language translation.

Thus, CATS will translate vital documents such as public route schedules, the Title VI Complaint Forms, the Title VI reporting process, the LAP, and public notices of changes to transit service into Spanish and Vietnamese. CATS staff will utilize features such as Google Translate and multilingual staff from CATS to translate vital documents for eligible LEP language groups upon request. CATS will also proceed with oral interpretation options for compliance with LEP regulations.

Staff Training

The following training will be provided to CATS staff:

- Information on the Title VI policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the Language Identification Flashcards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- Bus operators are trained to seek translation assistance from other passengers on board the bus when they are either unable to understand or communicate with an LEP person.

Information distributed to all CATS' staff.

CATS will incorporate the training video developed by the FTA on Title VI requirements into the Bus Operator Training Program as well as training of customer service staff. The video explains the language access requirement of Title VI and teaches our employees how to handle requests from LEP persons appropriately.

Additionally, CATS' Safety and Training Department will provide related LEP training to CATS employees, including information from quarterly Civil Rights workshops, training sessions for conducting complaint investigations according to federal guidelines, and streamlining the complaint investigative process. Employees will also receive training from the Safety and Training Department after any modifications to the LAP document or guidelines.

Translation of Documents

- In those cases where the need arises for LEP outreach, CATS will consider the following options:
- When CATS' staff prepares a document or schedules a meeting, the target audience is expected to include LEP individuals; documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, fare/service change announcements, and other transit publications are available in an alternative language for the known LEP population.

Formal Interpreters

- When necessary and reasonable to provide meaningful access for LEP clients, CATS will provide qualified interpreters, if available. At essential stages requiring one-on-one contact, written translation and verbal interpretation services will be provided, consistent with languages identified as predominant for our CATS ridership.
- CATS may require a formal interpreter to certify to the following:
- The interpreter understood the matter communicated and rendered a competent interpretation.
- The interpreter will maintain private information. Non-public data will not be disclosed without written authorization from the client.
- Bilingual CATS employees, when available, can provide limited assistance to LEP clients as part of their regular job duties.

Informal Interpreters

- CATS staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. Informal interpreters may include family members, friends, legal guardians, service representatives, or advocates of the LEP client. However, informal interpreters, especially children, are not competent to provide quality and accurate interpretations in many circumstances. There may be issues of confidentiality, competency, or conflict of interest.
- An LEP person may use an informal interpreter of his or her choosing at their expense, either of or as a supplement to the free language assistance offered by CATS. If possible, CATS should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter, the informal interpreter may interpret after CATS has offered free interpreter services.
- If an LEP client wants to use his or her informal interpreter, CATS reserves the right to have a formal interpreter present.

Monitoring

Monitoring and Updating the LAP - CATS will update the LAP as required by FTA. At a minimum, the plan will be reviewed and updated every three years, or if demographic information indicates that higher concentrations of LEP individuals are present in the CATS service area. Updates will include the following:

- The estimated 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
- The determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been sufficient to meet the need
- Determine whether the transit system's financial resources are sufficient to fund language assistance resources needed
- Determine whether CATS fully complies with the goals of this LAP
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

Dissemination of the CATS Language Assistance Program

- A link to the CATS LAP and the Title VI Plan will be included on the CATS website www.brcats.com/title-vi
- Any person or agency with internet access will access and download the plan from the CATS website.
Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in-person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which CATS will provide, if feasible.
- Questions or comments regarding the LAP may be submitted to the Title VI Compliance Manager, Capital Area Transit System, 2250 Florida Avenue, Baton Rouge, LA 70802, phone number (225) 346-5548.



APPENDIX F: Public Participation Plan

Public Participation Plan Capital Area Transit Authority

Final
September 2022

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Purpose

The Purpose of this public participation plan (PPP) is to detail how CATS will deliver information, services, and programs that reflect the community's values and benefit all community areas. CATS recognizes the necessity of involving the public in the planning and implementation of transit services.

CATS' public engagement strategies are designed to provide the public with access to information about the agency's services and provide a variety of efficient and convenient methods for receiving and considering public comments before implementing service changes. CATS also recognizes the importance of many types of stakeholders in the decision-making process. These include other units of government, metropolitan area agencies, community-based organizations, significant employers, passengers, and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

According to FTA Title VI regulatory guidance, the recipients and sub-recipients should therefore seek out and consider the viewpoints of minority and low-income populations and individuals who do not speak English fluently in the course of conducting public outreach and involvement activities. (FTA Circular 4702.1B) Furthermore, the funding recipients and sub-recipients should offer early and continuous opportunities for the public to identify the social, economic, and environmental impacts of proposed transportation decisions.

This effort includes seeking out and considering the viewpoints of minority, low-income, and LEP populations (as well as older adults and people with limited mobility) while conducting public outreach activities, consistent with Federal Transit Administration (FTA) Circular 4702.1B.

CATS may modify its public participation methods over time based on the needs of its customers and the general public. Therefore, this plan is a living document that may be updated periodically to reflect community preferences, changing demographics, transit services, and needs identified from new communication and outreach methods.

When planning for public engagement, CATS will incorporate strategies intended to promote the involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

Principles

The following principles are used to develop the Public Participation Plan for CATS projects and programs:

- CATS will determine what non-English languages and other barriers may exist to public participation within the service area.
- CATS will provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to LEP populations in its service area.
- Public meetings will be held in locations that are accessible to transit riders and people

with disabilities and will be scheduled at times convenient for the members of the general public.

- Public meetings and hearings will be advertised in the community where non- English languages have been identified in the updated LEP Plan. Through printed materials (e.g., interior cards, flyers, and/or comment cards) describing the proposed changes or other critical system information on-board buses, at major transit stops, local print media, and the CATS website.
- CATS will provide notification regarding the availability of language assistance at public meetings as described in the LAP.

Goals

CATS recognizes the importance of involving the public in planning and implementing transportation projects and services. Moreover, the agency believes firmly that consistent communication with riders, businesses, and visitors, alike is key to the success of CATS planning and project development efforts. Therefore, the goals of the CATS PPP are to promote meaningful opportunities for the community, including low-income, minority, and LEP populations, to be involved in the potential impacts of proposed transportation decisions by CATS. To that end, CATS has developed four goals for public participation:

- **Awareness:** Increase awareness of transportation projects in East Baton Rouge Parish and within the transit service area in the capital region.
- **Education and Outreach:** To educate the public, raise awareness, and allow public input in the CATS transportation planning process through social media, printed materials, and other engagement methods.
- **Participation:** To provide ample opportunity for stakeholders and the general public to participate in the planning process and provide feedback on draft documents, policies, and services.
- **Partnerships:** To foster more significant partnerships with local public agencies, social service organizations, and other community groups throughout

CATS' staff will utilize the following considerations developed as part of the efforts to evaluate the racial equity implications of critical decisions:

- Have various ethnic communities/people of color been informed, meaningfully involved, and authentically represented in these processes/decisions?
- How has this been done?
- How has the feedback been considered and incorporated?
- Is there a group that benefits more than another because of this process/decision?
- What could be one unintended consequence of this process/decision for ethnic communities/communities of color?
- What action will be implemented to advance equity in this process/decision?

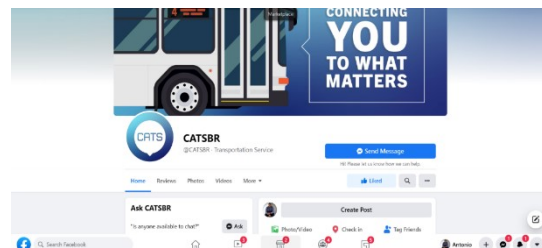
Methods of Public Engagement

The PPP identifies a menu of available methods for providing information to CATS customers and the general public. While these communication methods are broadcast

widely, they are critical tools in reaching minority and LEP populations. Staff considers several factors when designing the public engagement process, such as the magnitude of the proposed change or decision, what level of influence public opinion has over the decision, and who will be impacted by the decision. Moreover, CATS incorporates strategies intended to promote the involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with FTA Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance. All communication methods are available for translation or interpretation upon request.

CATS communicates relevant information to customers and the general public through the following methods:

- **Public notices** – These are published in the daily newspaper of record, the Advocate, and posted on the CATS website.
- **CATS' Social Media** – CATS' Facebook page, Twitter, and Instagram, are monitored and used by staff to interact with riders and can be leveraged to push out information regarding service changes and opportunities for the public to participate in the CATS decision-making process. CATS' Facebook page is used by staff to interact with riders and can be leveraged to push out information regarding service changes and opportunities for the public to participate in CATS' decision-making process.
- **CATS' Website** – CATS' website, www.brcats.com, is one of the primary sources of information for CATS' riders and the general public. Several tools are available on the site to communicate service changes and notify the public of opportunities to participate in CATS' decision-making processes. These include "Recent News" that appears as short summaries on the home page and, when selected, can lead to longer news items amongst meeting agendas, minutes, and links to route maps, customer surveys. In addition, all route schedules and many documents are available in either Spanish or Vietnamese upon request and the website can be translated into both Spanish and Vietnamese.
- **E-mails to CATS Customers**– To date, all electronic notifications are sent out by a CATS' mass e-mail subscription service. Customers can sign up on CATS' website to receive e-mails from CATS. In addition, staff has the flexibility to target e-mail communications to subgroups of CATS ridership, such as interested members of the public about updates to project schedules, upcoming meetings or workshops, online surveys for feedback, and any other agency activities.
- **Rider Alerts** are small notices or pamphlets that fit in the existing schedule holders on the buses. These can be placed on all buses or be targeted to the routes and times that would be impacted by a change or other informational campaign.
- **Posters** at CATS Terminals: Printed sogms are posted around CATS' terminal, including designated news bulletin areas within the waiting room and at the customer service window.



- **Mailers to partners:** These printed materials can be distributed via mail to CATS' partners. They can include letters to key staff at these locations and additional posters or other materials to post around their offices.
- **Paid ads** in local media: CATS can publish paid advertisements in the local newspaper of record, *The Advocate*, community newsletters, and local broadcast channels. In addition to paid advertisements can be translated into Spanish and Vietnamese upon request.
- **CATS Connects:** CATS Connects serves as an educational resource library that houses informational materials, branding assets, imagery and archived social graphics and news.
- **Customer Surveys** CATS conducts a Customer Satisfaction Survey to collect and analyze customer opinions regarding all aspects of service, update CATS customer profiles and travel patterns, and compare benchmark scores with similar transit agencies. The latest survey was administered on-board all fixed-route CATS services in the Spring of 2021. CATS is administering a survey of the paratransit riders that will begin soon and is intended to be conducted each year.
- **Press releases** – Press releases aim to generate news coverage of CATS' events, changes, public meetings, etc. They are distributed via e-mail to CATS' communications contact list and posted on the News section of CATS' website
- **Public Meetings** – The backbone of CATS' public participation efforts. Public meetings are held monthly and are open to the public. There, discussions between interested parties, often including riders, can provide feedback on CATS' activities. It is a question-and-answer format and an open dialogue with a member of the CATS staff to make sure comments stay focused on the proposed change and that everyone has a chance to ask questions. Federal regulations and comments do NOT require a public meeting and do not go into the public record.
- **Public Hearings** - A public hearing is required by federal or state regulations where comments from the public go into the public record. A public hearing is governed by rules concerning who speaks when and for how long and is overseen by a CATS official. A public hearing is NOT a question-and-answer format.
- **Community Events** – CATS staff make sure that informational tables are at community events and CATS Terminals, where customers can find shared information about changes to service, new initiatives, or community resources. CATS also found that having technical staff available at outreach events in addition to customer service and communications staff can allow for more detailed conversations with customers and members of the public.
- **CATS' Board Meetings** - The Board of Commissioners meet on the third Tuesday of each month at 4:30 p.m. at either two locations: the CATS administrative building (350 N. Donmoor St, Baton Rouge, LA 70802) or the BREC Recreation & Park Commission (3140 N Sherwood Forest Drive, Baton Rouge, LA 70814). These meetings are open to the public and include an opportunity for the public to comment on any item relating to transit. In addition, there will be cards for members of the public to complete (this applies to everyone wishing to speak at the board meetings, except the board members themselves; all employees wishing to speak must complete the cards as well).
- **Public Comments** – CATS is always open to and accepting of public comments, regardless of whether they were given as part of an organized effort. Formal public

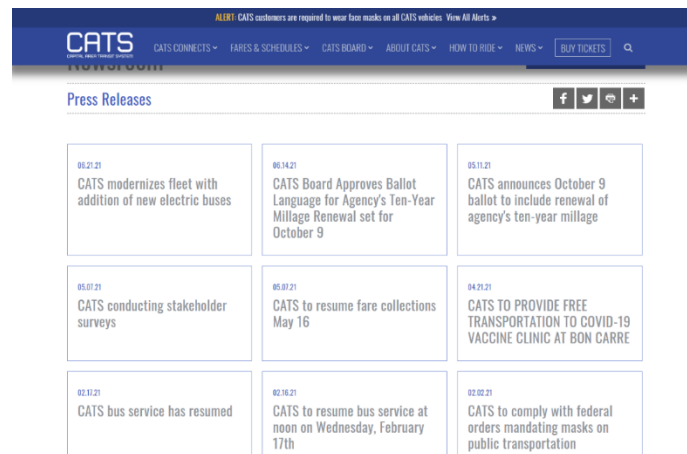
comment periods solicit comments on major public involvement efforts around an agency service or system change. Comments from comment cards are valuable for open-ended discussions. In addition, open-ended questionnaires are distributed in printed form and digital form.

Comments are accepted anytime by the following methods. In addition, special projects may have a public outreach period where one can comment on that specific project.

- Share comments by phone at (225)389-8282,
- E-mail comments at catscustomerservice@brcats.com
- Post comments on CATS' Facebook page or Twitter page @BTRCATS
- Mail comments to CATS at 2250 Florida Blvd. Baton Rouge, LA 70802
- Share comments in person by attending a public meeting

Public Outreach (January 2021 to August 2022)

- Board meetings were held monthly to give updates on administrative matters and act on plans, contracts, updates to policies, and financial statements.
- Numerous public meetings were held to receive public input on changes in routes and schedules
- During the fall of 2016 to the fall of 2020, route adjustments and service changes were made in order to maintain route efficiency and improve service to the system.
- CATS created and distributed Customer Surveys to gather updated transit trip information and behavioral data from CATS' riders in the spring of 2021. These efforts help the agency know the needs of the riders.
- The BRT Project conducted two public meetings in May of 2022.
- The Comprehensive Operational Analysis conducted eight meetings in the month of February 2022.
- CATS Staff attended many community events that included 8 events in the month of August 2022.
- CATS Staff set up a table at the main terminal with all Title VI policies available for comment on 8-26-2022 and 8-31-2022 and received a total of 23 comments on general concerns that were forwarded to the appropriate department and added an additional 32 riders that signed up for the rider alert email list. There were no comments concerning the policies.
- In addition, CATS staff posted on social media several times with a link to the new policies and allowed for comment for 10 days. No responses were received.



COVID-19 Meeting Accommodations (March 2020)

During normal circumstances, meeting times and convenient locations for target audiences are crucial to providing meaningful opportunities for public participation. However, due to the pandemic, alternative methods of public involvement have taken place.

In accord with Act No. 302, meetings held beginning June 2020 to December 2021 were held virtually to reduce and limit the spread of COVID-19 in Louisiana and preserve the health and safety of all public members; the Governor declared the COVID-19 Public Health Emergency. In addition, he ordered that it is necessary to limit public gatherings in a single place at the same time to avoid individuals being close to one another.

As a result of the public health emergency, the limitations imposed on public gatherings and personal interactions, and the risks associated with the participation of members in a physical meeting of the Board of Commissioners for Capital Area Transit System and Public Transportation Commission as a result of this certifies that to protect the lives, property, health, safety, and welfare of the citizens of Louisiana, it is necessary to conduct the meeting for regular business via teleconference and/or online to assure the presence of a quorum of voting members.

Act No. 302 of the 2020 Regular Session of the Louisiana Legislature enacted La. R.S. 42:17.1, as subsequently amended by Act No. 43 of the 2020 Second Extraordinary Session, allows a public body to conduct business “via electronic means” if specific requirements are met.

Equity Considerations

CATS recognizes that minority and low-income populations have historically and systematically been excluded from participating in public decision-making. Moreover, due to persistent societal and cultural influences, it can be challenging to ensure diverse public participation in CATS’ decision-making, despite the concerted efforts described in this plan. CATS, therefore, recognizes the need to plan carefully to design inclusive outreach processes and build in critical steps to consider whether a public participation process and its outcomes are achieving the intended results.

Outcomes

The outcomes of public participation will be reported openly and transparently. The expectation is that, once community members have participated in a process, CATS owes it to them to say how their participation influenced the outcome. In addition, CATS should demonstrate that it explored the suggestions and recommendations of the public and considered that as part of the process.

Conclusion

This PPP must, first and foremost, demonstrate how CATS is accountable to the public. The strategic approach, goals, and guiding principles CATS has established are intended to foster public participation by providing early, continuous, and meaningful public engagement processes for its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of limited English

proficiency (LEP), minority or socioeconomic status, or disability. The methods and techniques employed by CATS help increase public participation rates, particularly among those individuals and populations that are often overlooked or underrepresented.

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

CATS Staff set up a table at the main terminal with all Title VI policies available for comment on 8-26-2022 and 8-31-2022 and received a total of 23 comments on general concerns that were forwarded to the appropriate department and added an additional 32 riders that signed up for the rider alert email list. There were no comments concerning the policies.

In addition, CATS staff posted on social media several times with a link to the new policies and allowed for comment for 10 days. No responses were received.

APPENDIX G: MAJOR SERVICE CHANGE AND FARE CHANGE POLICIES FOR SERVICE EQUITY ANALYSES

Capital Area Transit System (CATS) Policy and Procedure for Major Service Changes and Fare Changes

Purpose of the Policy:

The Federal Transit Administration (FTA) Circular 4702.1 B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" effective October 1, 2012) requires that all FTA recipients who operate 50 or more fixed route vehicles in peak service and serve a population of 200,000 or greater, evaluate any fare change or any major service change, during the planning and programming stages.

When planning fare changes or major services changes, CATS shall consider if any adverse effect would occur as a result of the fare change or major service change. CATS shall consider the degree of adverse effects (if any), analyze those effects, and discuss any necessary minimization and/or mitigation that need to be considered as a result of



the proposed fare change or major service change.

The Fare Change and Major Service Change Policy defines thresholds for determining whether potential fare and major service changes will have an adverse effect based on possible:

Disparate impact(s) as determined by an analysis of race, color, or national origin within the service area; or

Disproportionate burden(s) as determined by an analysis of low-income populations within the service area.



Policy Statement:

It is the policy of CATS to solicit and consider public comment from riders, other citizens, and the Board of Commissioners before implementing fare changes and/or major service change. To this end, the CATS Board of Commissioners has adopted the following citizen participation related public hearing policies and procedures.

Fare Changes:

A public hearing must be held if there is any fare change to any of the public transportation modes (Fixed Route, CATS on Demand, or LYNX by CATS). For changes to existing transit fares, the FTA requires all transit providers to conduct a Fare Equity Analysis for all proposed fare changes.

Major Service Changes:

A public hearing must be held if there is any major service change to any of the public transportation modes (Fixed Route, CATS on Demand or LYNX by CATS).

For all major service changes, the FTA requires all transit providers to develop guidelines and thresholds for what it considers a "major" service change. For major service changes, the FTA requires CATS to conduct a Service Equity Analysis, which includes an analysis of adverse effects

relating to possible disparate impacts and disproportionate burdens. It is the CATS policy to conduct a Service Equity Analysis for any proposed major service changes.

The following is considered a major service change (unless otherwise noted under “Exemptions”) and will be evaluated in accordance with the regulatory requirements set forth in FTA Circular 4702.1B.

An equity analysis is required for any major service change. A major service change is defined by the criteria below:

1. When the route revenue miles on any individual route or combination of routes, increases or decreases by 25% or more when compared to the previous fiscal year.
2. When the route revenue hours on any individual route or combination of routes increases or decreases 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:

- Initiation/Discontinuance of 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 six months.
- Initiation/Discontinuance of Promotional Fares - The initiation or discontinuance of any temporary promotional fares that will be or have been in effect for a maximum of six months.
- Natural or Catastrophic Disasters - Forces of nature such as earthquakes, flooding, wildfires, 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.
- When a segment of one route is moved to another route but the route miles or hours do not change by 25%.

Public Notice Requirements:

Prior to the implementation of any fare change or major service change that falls within the levels established above, a press release will be sent to major news outlets in Baton Rouge announcing where the public can find the details of the upcoming service change. A comment form will be available on the CATS website for at least 30 days prior to the board meeting and public hearing adopting the change. In addition, at least one public meeting will be held and notices of public hearing will be published at least fourteen (14) days prior to the hearing, and will comply

with the CATS guidelines for Board of Commissioner meetings. The notices will contain the description of the contemplated fare change or major service change, as appropriate, and the time and place of the hearing. All comments collected during this 30 day period will be summarized and presented to the Board of Commissioners, and any modifications made due to these comments will be presented at the Board meeting by CATS staff. Any interested citizen may address the governing body related to the proposed fare change or major service change, within the normal parameters set



for public comment at CATS Board of Commissioners meetings.

Applicability to Third-Party Contract Recipients:

Any agency, firm, or governmental jurisdiction, which operates public transit service within the CATS Service Area utilizing FTA funds provided through CATS, shall follow the above process to solicit and consider public comment prior to any fare change or major service change.

Definitions

Adverse Effects - CATS shall define and analyze adverse effects related to major changes in transit service. Adverse effects are 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, an increase in headways). Elimination of a route will generally have a greater adverse impact than a change in headways. Additions to service may also result in disparate impacts, especially if they come at the expense of reductions in service on other routes.

Disparate Impact – Refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where CATS' policy or practice lacks a substantial legitimate justification, and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate Burden – Refers to a neutral policy or practice that disproportionately affects the low-income population more than non-low-income population. A finding of disproportionate burden requires CATS to evaluate alternatives and mitigate burdens where practicable.

Low-Income Person – Means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Major Service Change – Means any service change from the previous fiscal year that would add or eliminate more than twenty-five percent (25%) of the revenue route miles, or revenue route hours on any individual route or combination of routes, if the combination does not affect or eliminate any bus stops.

Minority Population – Means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Predominantly Minority Area - Means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Policies

Fare Change Policy

For changes to existing transit fares, the FTA requires all transit providers to conduct a fare equity analysis for all potential transit fare adjustments. It is CATS' policy to conduct a Fare Equity Analysis for all proposed fare changes.

Major Service Change Policy

For all major service changes, the FTA requires all transit providers to develop guidelines and thresholds to define a “major” service change. For major service changes, the FTA requires CATS to conduct a Service Equity Analysis, which includes an analysis of adverse effects relating to possible disparate impacts and disproportionate burdens. It is CATS’ policy to conduct a Service Equity Analysis for any proposed major service changes.



Disparate Impact Policy

The purpose of the Disparate Impact Policy is to establish a threshold, which identifies when adverse effects of any fare change or major service change that is borne disproportionately by minority populations.

For the purpose 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 Block Groups where the percentage of minority persons is higher than the CATS service area average.

A disparate impact occurs if a proposed fare or major service change requires a minority population to bear adverse effects by ten percent (10%) or more than the adverse effects borne by the non-minority population.

If CATS finds a potential disparate impact, the transit agency will take steps to avoid, minimize or mitigate impacts. Next, CATS must re-analyze the modified service plan to determine whether the impacts were avoided, minimized or mitigated. If CATS chooses not to alter the proposed changes, the transit agency may implement the fare or service change if there is substantial legitimate justification for the change and the transit agency can show that there are no alternatives that would have less of an impact on the minority population and would still accomplish the agency’s legitimate program goals.

Disproportionate Burden Policy

The purpose of this policy is to establish a threshold, which identifies when adverse effects of any fare or major service change are borne disproportionately by 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 ten percent (10%) or more than the adverse effects borne by the non-low income population.



If CATS finds a potential disproportionate burden, 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. If CATS chooses not to alter the proposed changes, the agency may implement the service or fare

change if there is substantial legitimate justification for the change and the agency can show that there are no practical alternatives that would have less of an impact on the low-income population and would still accomplish the agency’s legitimate program goals.

APPENDIX H: Minutes from September 20, 2022

Board of Commissioners Meeting