



Public Works
Transit Division
2411 Tallevast Road
Sarasota, FL 34243
Phone: (941) 747-8621
www.mymanatee.org

March 22, 2022

Dee Foster
Office of Civil Rights
Federal Transit Administration, Region 4
230 Peachtree, NW
Suite 1400
Atlanta, GA 30303

Dear Ms. Foster,

On behalf of the Board of County Commissioners, Manatee County, Florida, please accept this letter and the accompanying 2022 Title VI Program Update for your review and compliance determination. Included with the Title VI Program Update is a signed copy of Authorizing Resolution R-22-026 which authorizes submittal of the 2022 Title VI Program Update and was approved by the Manatee County Board of County Commissioners (BCC) on March 8, 2022.

Sincerely,

Chad Butzow

Chad Butzow,
Public Works Director
Manatee County Government

Attachment: 2022 Title VI Program Update

Cc: William Steele, Manatee County Public Works/Transit Division Manager
Jonathan Roberson, Manatee County Public Works/Transit Planning Manager

JAMES
SATCNER
District 1

REGGIE
BELLAMY
District 2

KEVIN
VAN OSTENBRIDGE
District 3

MISTY
SERVIA
District 4

VANESSA
BAUGH
District 5

CAROL
WHITMORE
At Large

GEORGE W.
KRUSE
At Large

Certificate Of Completion

Envelope Id: FA46CAE1ECAC4BC99918BD8A2E80017B	Status: Completed
Subject: Please DocuSign: Manatee County 2022 Title VI Plan Transmittal Letter 3.22.22.pdf, Final BCC Ap...	
Source Envelope:	
Document Pages: 78	Signatures: 1
Certificate Pages: 1	Initials: 0
AutoNav: Enabled	Envelope Originator:
Enveloped Stamping: Enabled	Francisca Backenstross
Time Zone: (UTC-05:00) Eastern Time (US & Canada)	1112 Manatee Ave West
	Suite 702
	Bradenton, FL 34205
	francisca.backenstross@mymanatee.org
	IP Address: 74.117.68.158

Record Tracking

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3/22/2022 11:25:35 AM	francisca.backenstross@mymanatee.org	

Signer Events

Signature	Timestamp
<p>Chad Butzow chad.butzow@mymanatee.org Public Works Director Security Level: Email, Account Authentication (None)</p> <p><i>Chad Butzow</i></p> <p>Signature Adoption: Pre-selected Style Using IP Address: 74.117.68.162 Signed using mobile</p>	<p>Sent: 3/22/2022 11:40:38 AM Viewed: 3/22/2022 11:44:17 AM Signed: 3/22/2022 11:44:55 AM</p>

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Status	Timestamp
<p>Jonathan Roberson jonathan.roberson@mymanatee.org Security Level: Email, Account Authentication (None)</p> <div style="border: 2px solid blue; padding: 5px; display: inline-block; font-weight: bold; color: blue;">COPIED</div>	<p>Sent: 3/22/2022 11:44:56 AM Viewed: 3/22/2022 12:51:30 PM</p>

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Envelope Summary Events

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Envelope Sent	3/22/2022 11:40:39 AM
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Completed	3/22/2022 11:44:56 AM

Payment Events

Status	Timestamps
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RESOLUTION R-22-026

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS, MANATEE COUNTY, FLORIDA, AUTHORIZING THE SUBMISSION OF THE APPROVED 2022 PUBLIC WORKS/TRANSIT DIVISION TITLE VI PROGRAM UPDATE AND SUPPORTING DOCUMENTS TO THE FEDERAL TRANSIT ADMINISTRATION

WHEREAS, the Federal Transit Administration requires that all direct and primary funding recipients to document their compliance with Title VI requirements by submitting a Title VI Program Update once every three (3) years; and

WHEREAS, the Board of County Commissioners (“the Board”) must approve each Title VI Program Update prior to submission to the Federal Transit Administration (FTA).


NOW THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Manatee County, Florida, that:

1. The BOARD hereby approves the 2022 Title VI Program Update.
2. The Public Works Director or designee is hereby authorized to sign the Title VI Program Update transmittal letter forwarding the 2022 Title VI Program update to FTA.
3. The BOARD hereby authorizes the Transit Division Manager to electronically submit the 2022 Title VI Program Update to FTA, and sign all assurances, warranties, certifications, assurances, and other supporting documentation which may be required in connection with the 2022 Title VI Program Update.

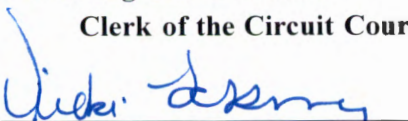
PASSED AND DULY ADOPTED with a quorum present and voting this the 8th day of March 2022.



**BOARD OF COUNTY COMMISSIONERS
MANATEE COUNTY, FLORIDA**

By: 
Kevin Van Ostenbridge, Chairperson

**ATTEST: Angelina Colennoso
Clerk of the Circuit Court**

By: 

APPROVED in Open Session
3/8/2022
Manatee County Board of County
Commissioners



Board of County Commissioners
March 8, 2022 - Regular Meeting

SUBJECT

ADOPTION OF RESOLUTION R-22-026 APPROVING THE TRANSIT DIVISION 2022 TITLE VI PROGRAM UPDATE AND AUTHORIZING SUBMISSION OF THE UPDATE TO THE FEDERAL TRANSIT ADMINISTRATION

Category

CONSENT AGENDA

Briefings

None

Contact and/or Presenter Information

Jonathan Roberson, Transit Division Planning Manager, jonathan.roberson@mymanatee.org, (941) 747-8621 x7622

William Steele, Transit Division Manager, william.steele@mymanatee.org, (941) 747-8621 x7440

Action Requested

Adoption of Resolution R-22-026 approving the Transit Division 2022 Title VI Program Update and authorizing submission of the Title VI Program Update to the Federal Transit Administration (FTA).

Enabling/Regulating Authority

Title VI of the Civil Right Act of 1964

Background Discussion

Manatee County Government, as the public transportation provider in Manatee County, Florida, is required to submit to the Federal Transit Administration (FTA) a Title VI Program Update every three years. This Program update is intended to demonstrate compliance with Title VI requirements and to ensure that transit services are equitably distributed in the community while providing access and mobility irrespective of race, color, or national origin.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. The FTA Title VI implementing regulations ensure nondiscriminatory transportation in support of their mission to enhance the social and economic quality of life for all Americans. As a recipient of FTA funding, Manatee County Government (MCG) must ensure that it is in compliance with all applicable FTA Title VI implementing regulations and is required to prepare and submit an updated Title VI Program every three (3) years. Guidance from FTA published in the FTA Title VI Circular 4702.1B requires grant recipients operating less than 50 Fixed Route vehicles in peak service to include the following in their Title VI Program Update:

- A Title VI Notice, complaint procedures, and complaint form
- A Limited English Proficiency (LEP) Plan and a Public Participation Plan
- A list of any Title VI investigations, lawsuits and/or complaints
- A table depicting racial composition of membership for non-elected bodies, when membership is selected by the grant recipient
- Information regarding the siting of fixed facilities
- The Title VI Program update must be approved by the grant recipient's Board of Directors or appropriate governing entity
- A set of system-wide standards and policies (i.e., on-time performance, service frequency, vehicle load passenger amenities, etc.)

The last Title VI Program Update was approved on April 23, 2019, by the Manatee County Board of County Commissioners as a consent agenda item. The attached 2022 Title VI Program Update fulfills the FTA requirements outlined in Circular 4701.1B and is the current three-year update to the May 2019 Title VI Report.

Attorney Review

Not Reviewed (No apparent legal issues)

Instructions to Board Records [emailed 3/9/2022](#)

Please forward the signed Resolution to Jonathan Roberson, Transit Division Planning Manager, jonathan.roberson@mymanatee.org, (941) 747-8621 x7622

Cost and Funds Source Account Number and Name

N/A

Amount and Frequency of Recurring Costs

N/A

RESOLUTION R-22-026

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS, MANATEE COUNTY, FLORIDA, AUTHORIZING THE SUBMISSION OF THE APPROVED 2022 PUBLIC WORKS/TRANSIT DIVISION TITLE VI PROGRAM UPDATE AND SUPPORTING DOCUMENTS TO THE FEDERAL TRANSIT ADMINISTRATION

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2. The Public Works Director or designee is hereby authorized to sign the Title VI Program Update transmittal letter forwarding the 2022 Title VI Program update to FTA.
3. The BOARD hereby authorizes the Transit Division Manager to electronically submit the 2022 Title VI Program Update to FTA, and sign all assurances, warranties, certifications, assurances, and other supporting documentation which may be required in connection with the 2022 Title VI Program Update.

PASSED AND DULY ADOPTED with a quorum present and voting this the 8th day of March 2022.

**BOARD OF COUNTY COMMISSIONERS
MANATEE COUNTY, FLORIDA**

By: _____
Kevin Van Ostenbridge, Chairperson

**ATTEST: Angelina Colenoso
Clerk of the Circuit Court**

By: _____

Title VI Program Update

Public Works/Transit Division
2411 Tallevast Road
Sarasota, FL 34243

March 2022



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Introduction

The Manatee County Government Public Works/Transit Division, as the public transportation provider for Manatee County, is required to submit an update of its Title VI Program to the Federal Transit Administration (FTA) every three years. This update documents the level and quality of transit service provided to minority and low-income areas in Manatee County and system-wide environmental justice policies and procedures, pursuant to Title VI of the Civil Rights Act of 1964, as amended. This updated program is submitted to the FTA and is intended to demonstrate compliance with Title VI requirements. The Public Works/Transit Division submitted the last Title VI Plan in May 2019.

The purpose of this Title VI Program is to assure that no person is excluded from participating in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance from the FTA, on the grounds of race, color, or national origin. This plan details policies and procedures for ensuring Title VI compliance, including key contacts.

Although challenges are encountered due to economic conditions, financial constraints and other externalities, the Public Works/Transit Division works to continually provide transit service in the Manatee County service area in a manner that is customer-friendly, fair and equitable.

Policy Statement

The Manatee County Government Public Works/Transit Division provides transit services with a firm policy of nondiscrimination. Manatee County Government, through the Public Works/Transit Division, works to ensure that public transportation services are provided in a nondiscriminatory manner that aims to enhance the social and economic quality of life for Manatee County residents and visitors.

Section 601 of Title VI of the Civil Rights Act of 1964 states 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.” (42 U.S.C. § 2000d).

Environmental Justice (EJ) Executive Order 12898, included as a component of Title VI requirements, the guarantee of fair treatment for all people regardless of race and income. The requirements under EJ 12898 indicate that the Public Works/Transit Division shall identify and address, as appropriate, any potential disproportionate and/or adverse impact of its programs, policies, and activities with respect to minority and low-income populations. In addition to EJ Executive Order 12898 considerations in the administration of public transit, Executive Order 13166, requires the Public Works/Transit Division to undertake reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to public transit programs, services, and information.



Manatee County Government's Transit Planning Manager, is responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services, and program information dissemination, administration. Additionally, the Transit Division Manager is responsible for implementing all aspects of the public transit Title VI Program for Manatee County Government. All Transit Division employees share the responsibility and are committed to ensuring that the Public Works/Transit Division Title VI Program is strictly adhered to and ensuring continuing Title VI compliance.

To request a copy of the agency's Title VI Program, or for more information on the Transit Division's civil rights program and the procedures to file a complaint, contact the Transit Division by phone, email, in-person, or through the Manatee County Government/Transit Division website.

By Phone: (941) 747-8621, Manatee County Public Works / Transit Division

By Mail: Manatee County Public Works / Transit Division
2411 Tallevast Road
Sarasota, Florida 34243

By Email: mcats@mymanatee.org

By Website: www.mymanatee.org

Individuals and organizations also have the right to file a complaint with the Federal Transit Administration:

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



William P. Steele, Transit Division Manager

2-11-22

Date

Title VI Program Checklist

Checklist for All Grantees

Requirement	Section
General Requirements	
Requirement to Provide Title VI Assurances	Attached
Title VI Notice to the Public, including list of locations where notice is posted (English and Spanish)	Section 1.1
Title VI Complaint Procedures	Appendix B
Title VI Complaint Form (English and Spanish)	Appendix C
List of Title VI Investigations, Complaints, or Lawsuits	Section 1.3
Public Participation Plan and Summary of Outreach Efforts	Section 1.4
Meaningful access to Limited English Proficiency (LEP) persons	Section 1.5
Non-Elected Committee Racial Composition	N/A*
Sub Recipient Compliance and Monitoring Procedures	N/A*
Facility-Related Title VI Equity Analysis	N/A*
Board Approval of Title VI Program	Attached
Requirements for Fixed-Route Transit Providers	
Systemwide Service Standards	Section 2.1
Systemwide Service Policies	Section 2.2

Source: Federal Transit Administration (FTA) Circular 4702, Chapters III and IV.

*The Manatee County Public Works/Transit Division does not have transit-related planning boards or sub recipients. Additionally, no facility planning or location siting efforts have been performed since the 2019 Title VI Program Update.

Checklist for All Fixed Route Transit Providers

The following checklist provides the requirements for all fixed route transit providers.

Requirement	Section
Service Standards	
Vehicle Load	Appendix E
Vehicle Headway	Appendix F
On-Time Performance	Appendix F
Service Availability	Appendix D
Service Policies	
Transit Amenities	Appendix H
Vehicle Assignment	Appendix E
Major Service Modification Policy	Appendix I

Source: Federal Transit Administration (FTA) Circular 4702, Chapters III and IV.

Section 1: General Reporting Requirements

The following information addresses Title VI general reporting requirements, as described in FTA Circular 4702.1B.

1-1. Title VI Notice to the Public

Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, passenger shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations with regard to the recipient's program. Notices detailing a recipient's Title VI obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's language assistance plan.

The Manatee County Government (MCG) Public Works/Transit Division utilizes a Title VI public notice which directs citizens to contact the Transit Division with respect to any potential violation of Title VI protections. Such complaints could involve Transit Division programs, activities, and services. This notice is on the Transit Division website, on Transit Division buses, in public areas of the Transit Division's administrative office, and at Transit Stations. The notice is posted in English and Spanish. The notice also states that complaints may be filed directly with the Federal Transit Administration/Office of Civil Rights. A copy of that notice, in English and Spanish, is provided in **Appendix A**.

1-2. Title VI Complaint Procedures and Form

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients are required to develop procedures for investigating and tracking Title VI complaints and make their procedures for filing a complaint available to members of the general public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website. FTA requires recipients to include information regarding their complaint procedures in their Title VI Program updates in order for FTA to determine compliance with DOT's Title VI regulations.

The Public Works/Transit Division adopted procedures for investigating and tracking Title VI complaints, as shown in **Appendix B**. Any person who alleges Title VI discrimination has the right to file a formal complaint within 180 days of the alleged discriminatory actions. Individuals and organizations may file a complaint with the FTA's Office of Civil Rights by obtaining the complaint form from the MCG/Transit Division website. The Public Works/Transit Division Title VI Complaint Form and Title VI Complaint Procedure were updated in Spring 2018 to include a Spanish language version. Both Title VI Complaint forms are in **Appendix C** of this report and are posted on the MCG/Transit Division website.

1-3. Record of Title VI Investigations, Complaints, and Lawsuits

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

No Title VI or discrimination complaints have been filed against the MCG Public Works/Transit Division since the previous Title VI Program Update completed in 2019.

1-4. Promoting Inclusive Public Participation

The content and considerations of Title VI, the Executive Order on LEP (Limited English Proficiency), and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities). Grant recipients are required to comply with the public participation requirements of 49 U.S.C. Sections 5307(b) (i.e., requiring programs of projects to be developed with public participation) and 5307(c)(1)(I) (requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service). Recipients engaged in planning and other decision-making activities at the local level should consider the principles embodied in the planning regulations, and develop and use a documented public participation plan or process that provides adequate notice of public participation activities, as well as early and continuous opportunities for public review and comment at key decision points.

The Public Works/Transit Division seeks public participation in all transit planning and decision-making activities. Updates to the Transit Division's portion of the MCG website provide current information on activities, including, but not limited to:

- Public notices
- Proposed service modifications
- Upcoming public workshops
- Proposed fare modifications
- Annual Program of Projects
- Ongoing Transit Division plans and initiatives, and
- Instructional videos and informational brochures.

Comparable information is posted on Transit Division buses and at MCAT stations, as well as communicated via the on-board infotainment system.

Each year, the Transit Division produces revised route schedules and a system map that are also available on the MCG website. Those route schedules each contain information on Transit Division policies, procedures, and routes; and these documents are also placed onboard buses and at transit stations. Many of these documents and notices are available in both English and Spanish. A list of the documents provided in both English and Spanish include the following:

- Real time information (see **Figure 1**)
- Mobile ticketing information (see **Figure 2**)
- Port Manatee ConneXion Shuttle brochure
- Posted rider responsibilities
- Published bus schedules
- Title VI Notice
- Title VI Complaint Form

Figure 1: Real time information in Spanish



Figure 2: Mobile ticket information in Spanish



As part of the Transit Division’s 2018 Transit Development Plan (TDP) Major Update public participation process, on-board surveys, available in both English and Spanish, provide an important opportunity to gain valuable feedback on how the Transit Division can best serve the community and surrounding region. Also, the Public Works/Transit Division regularly participates in outreach events at local colleges and universities as well as several area mobile home parks and a Spanish translator is available at these events.

The MCG Public Works/Transit Division actively participates in the Sarasota/Manatee Metropolitan Planning Organization (MPO)’s Public Participation Planning process. Transit Division and MPO staff work together to ensure consistency between the public participation processes employed by the two agencies. The MPO Public Participation Plan is available on the MPO’s website (<https://www.mympo.org/m/mandates/ppp>). Adhering to the guidelines and procedures in this document ensures that there is cohesion across the region in terms of public outreach. The MPO also prepares a Title VI and Limited English Proficiency (LEP) Plan which indicates documents that are translated into Spanish and that provides notice to non-English speaking persons that a translator is available on request for all MPO meetings. As previously noted, the MPO intends to provide the Executive Summaries for key documents in Spanish, including **Long- Range Transportation Plan Updates, the Transportation Improvement Program, the Public Participation Plan, and the Citizens Guide to Civil Rights**. A goal of the MPO Public Participation Plan is to provide user-friendly materials that are appealing and easy to understand. The MPO may provide Executive Summaries in alternative formats, such as brochures or newsletters, depending on the work product. Like the Public Works/Transit Division, the MPO takes care to publish notices in the local community-based newspaper.

1-5. Providing Meaningful Access To Persons With Limited English Proficiency (LEP)

The recipient shall develop an assistance plan to address the identified needs of the LEP population(s) it serves. The DOT LEP Guidance recognizes that certain recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written plan. However, FTA has determined it is necessary to require its recipients to develop an assistance plan in order to ensure compliance.

FOUR-FACTOR ANALYSIS

To continue reaching Limited English Proficiency (LEP) persons in Manatee County, the Transit Division conducts targeted assessments and gathers data to gain an understanding of public transportation needs. Using the four-factor framework provided in Section V of the DOT LEP Guidance, Transit Division staff determine the following:

Factor 1 – The number and proportion of LEP persons served or encountered in the eligible service population

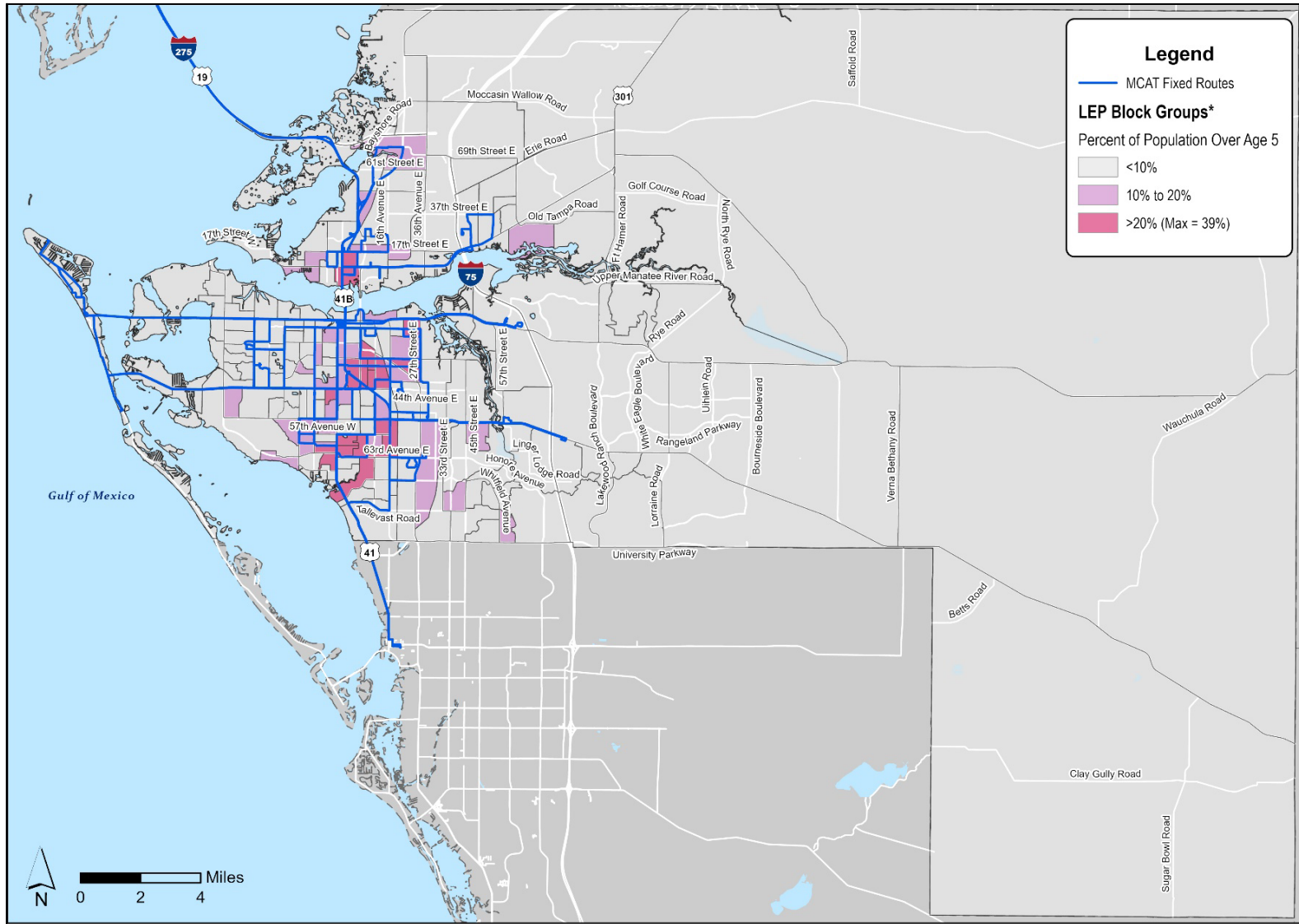
According to data from the 2019 American Community Survey (ACS), Manatee County has a total population of 384,213, of which 365,836 are over the age of five. The age threshold is significant as Census data only tabulates English proficiency for persons over the age of five. The ACS estimates that 341,544 (93.4 percent) of persons over the age of five speak English “very well” while 24,292, or 6.6 percent, speak English “less than very well,” with Spanish being the most predominant language spoken among those persons who speak English “less than very well.”

Table 1 provides a breakdown of the languages spoken in Manatee County. As shown, multiple languages are now tabulated under unique ACS categories. For example, all French, Haitian, and Cajun speaking persons are aggregated under one general category and this grouping of languages makes it difficult to determine which foreign languages to target for translation and thereby provide enhanced LEP access. The Title VI Safe Harbor provision stipulates that agencies provide written translation of vital documents for each LEP language group that **constitutes 5 percent or 1,000 persons of the total population of persons eligible to be served.**

As a result of the analysis, the Public Works/Transit Division will continue to target Spanish speakers as the predominant LEP population for assistance, and the agency will work to implement language assistance measures that meet the needs of Spanish-speaking persons in the community. Over time, Public Works/Transit Division staff will continue to monitor customer service requests for language assistance in languages other than Spanish and provide additional language services to passengers if resources are available.

Figure 3 shows the distribution of the LEP population based on the ACS data analysis. As shown in the Map, the highest concentrations of LEP populations can be found in the urbanized area of the county.

Figure 3: Limited English Proficiency Map



MCAT Title VI Analysis - Limited English Proficiency Block Groups

Factor 2 – The frequency with which LEP persons come into contact with the agency’s programs, activities, and services

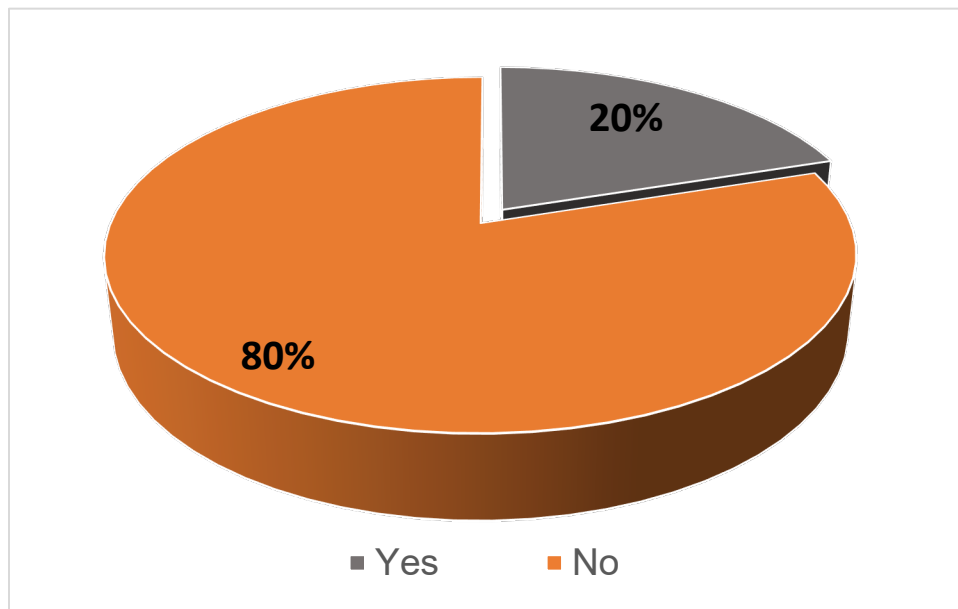
The 2018 on-board survey of fixed-route ridership was distributed in both English and Spanish language versions and included an LEP-related question. That survey reflects the most recent effort undertaken by the Transit Division to collect demographic information directly from fixed-route service users. The results show that 25 of the 849 respondents requested a Spanish-language version of the on-board survey, or approximately 3 percent.

An LEP-related question on the 2018 on-board survey asked respondents what language, or languages, other than English were spoken at home.

Figure 4 shows that 20 percent (approximately 170 of the 849 riders surveyed) of the onboard survey respondents spoke a language other than English while at home. Of the 170 respondents, 104 indicate that they speak Spanish, (i.e., the most common language other than English) spoken while at home.

Figure 4: 2018 On-Board Survey Results

Do you speak a language other than English at home?



Factor 3 – The importance of the programs, activities, and services to LEP persons

The MCG/Transit Division is the only public transportation service provider available to residents in Manatee County. As demonstrated by the analysis of demographic and on-board survey data, there are a significant number of LEP persons in the community who use those public transit services. Furthermore, recent public outreach efforts completed by Transit Division staff reinforce the importance of public transportation services for LEP persons for purposes of employment and access to educational opportunities. These efforts include the following:

- The Samoset Public Transportation and Action Plan (2020) - Involved direct outreach to Spanish speaking members of the community who desired more public transportation options to connect to employment and job training opportunities.
- Port ConneXion in Rubonia (2020) – Consisted of translation of published materials into Spanish and also outreach to Spanish-speaking members of the Rubonia community.

The Public Works/Transit Division employs bilingual staff (i.e., staff that are fluent in both English and Spanish), including Spanish speaking operators, supervisors, and customer service representatives, and experience consistently demonstrates that many bus riders require assistance from bilingual staff on a daily basis. The results of these bilingual interactions demonstrate the importance of the Public Works/Transit Division services to LEP populations. The bilingual staff members assist the agency in developing communication tools to better serve LEP populations, and in so doing, reduce barriers and improve access to persons who otherwise may not have other options for transportation.

Factor 4 – The costs and resources available

Over the last several years, the MCG Public Works/Transit Division continues to dedicate budget and resources with the intent to enhance access to services for LEP persons within the community. These resources include the hiring of bilingual staff, translation of various communications materials including website pages and program applications, and preparation of dedicated Spanish language materials used in the development of the agency's 2018 10-Year Transit Development Plan (TDP) Update. Bilingual staff consist of bilingual bus operators, operations supervisors, and customer service staff.

Currently, **the Transit Division has a consultant Work Assignment issued under a General Planning Services Contract that includes translation services for a variety of media and communications material.** This is consistent with past efforts to transition various outreach materials into Spanish language materials. The agency estimates that over \$10,000 was allocated to LEP outreach in the past year. Importantly, that total does not reflect staff time devoted to in-person communications and document translation.

Based on available financial and staff resources available, the Public Works/Transit Division is currently delivering competent and accurate language services for LEP populations within the service area. Public Works/Transit Division staff continue to monitor the need for additional language assistance, including the need for greater dissemination of information in the existing languages provided and/or translation to new languages. If additional services are needed, the Public Works/Transit Division staff will determine which additional language assistance measures are most cost-effective and feasible for implementation based upon demonstrated need and available financial resources.

Table 1: Limited English-Speaking Population; Manatee County, FL

Language Spoken	Estimated Population*	Estimated Population Speaking English Less Than "Very Well"	Percent of Estimated Population Speaking English Less Than "Very Well"
English	301,046	N/A	N/A
Spanish	46,402	18,355	5.02%
Other Indo-European Languages	4,781	1,425	0.39%
French, Haitian, Cajun	3,525	1,055	0.29%
German or other West Germanic languages	2,323	472	0.13%
Russian, Polish, or other Slavic languages	1,911	634	0.17%
Other Asian and Pacific Island languages	1,437	487	0.13%
Vietnamese	1,250	749	0.20%
Chinese (incl. Mandarin, Cantonese)	1,138	563	0.15%
Other and Unspecified Languages	873	258	0.07%
Tagalog (incl. Filipino)	756	230	0.06%
Arabic	256	64	0.02%
Korean	138	14	0.00%
Total	365,836	24,306	6.64%

*Reflects estimated number of persons over the age of 5 who speak each corresponding language.

Source: 5-Year American Community Survey Estimates (2015- 2019)

DEVELOPING A LANGUAGE ASSISTANCE PLAN

After completing the Four Factor Analysis, the Language Assistance Plan, or LAP Plan, addresses the results and provides further direction on how to best reach LEP persons in the community and facilitate access to Transit Division programs, activities, and services.

Describe how the recipient provides language assistance services by language

Individuals who have a limited ability to read, write, speak, or understand English are considered LEP persons. The MCG Public Works/Transit Division recognizes that special efforts are necessary to communicate important public transit information to some users. To meet this need, the MCG Public Works/Transit Division implements the following steps:

- Conduct outreach with the defined LEP community. When possible, coordinate with faith-based, school, or community and local neighborhood organizations serving minority populations.
- Provide language assistance on the customer service hotline utilizing bilingual staff.
- Prioritize important web page and website information for Spanish language translations.
- Continue to identify and hire Spanish speaking bus operators, operations supervisors, and customer service staff.
- Prepare Spanish language bus service announcements for communication via the onboard announcement and infotainment systems.
- Translate key program information material, such as fare payment, TD, and ADA program information; into Spanish language versions.
- Post signs to communicate language services available at initial contact points and continue to provide signage and written information on vehicles, the website, and at transfer stations in both English and Spanish.
- Indicate the availability of language translation services within outreach documents, including brochures, booklets, etc.
- Make available Spanish language telephone voicemail and menu systems.
- Publish public notices and other information in English and Spanish.
- Utilize community-based newspapers to reach low income, minority, and LEP populations.
- Utilize the MCG Neighborhood Connections publication to help reach and serve LEP persons.
- Continue to provide excellent customer service both in-person and over the phone, including Spanish translation. Front-line personnel will continue to routinely provide information benefiting LEP persons, and in so doing, better address identified needs.
- Participate to the greatest extent possible in community-based Special Events.
- Participate in updates to the County's evacuation and disaster preparedness plans to ensure these plans are inclusive, especially for LEP, low-income, and minority populations.
- Continue to review programs, activities, and services to ensure that LEP persons are offered the opportunity to participate.

- Identify language assistance needs through ongoing public outreach programs, including Travel Training outreach and assistance.

To determine how best to continue reaching LEP persons in Manatee County and improve ongoing efforts, the MCG Public Works/Transit Division continues to conduct targeted needs assessments and gather pertinent data to gain a better understanding of LEP needs.

Describe how the recipient provides notice to LEP persons about the availability of language assistance.

The MCG Public Works/Transit Division provides notice to LEP persons with respect to language assistance in many ways, including the following:

- **Transit Stations** - Information on public transit services, route and fare schedules, including instructions on how to make fare payments, and instructions on riding the bus with a bicycle are available in both English and Spanish.
- **Operations Staff** - Several transit operators and operations supervisors speak Spanish and assist Spanish-speaking bus riders as needed.
- **Operator Training** - Training for new transit operators and refresher training programs include reminders regarding the importance of effectively conveying information to passengers, as part of their customer service functions; and utilizing translators, when necessary.
- **Customer Service** - Customer service phone lines are to, the extent possible, staffed by persons who speak Spanish and English. Office personnel who are bilingual provide additional assistance.
- **Translated Material** - Spanish versions of public information brochures and survey materials are available on the website and for staff to distribute as needed.
- **Website** - Currently, MCAT's website provides visual aids and maps to provide information regarding transit services. The Manatee County Government provides the Google Translate feature on the website. In addition, the Transit Division Title VI notice is posted in Spanish on the website and on buses. **Table 2** shows which web pages have Spanish Language content available for the public.
- **Community Outreach** - The MCG Public Works/Transit Division includes staff and consultants who serve as translators for community outreach meetings.
- **Mobile Ticketing** - Promotional "How to" business cards are available in both English and Spanish.
- **Real-Time Passenger Information** - Promotional "How to" business cards are available in both English and Spanish.

Table 2: Spanish Language Webpage Content

English Language Web Content	Spanish Language Web Content
Agency Information	Informacion de la Agencia
ADA	ADA en espanol
Transportation Disadvantaged Program Application	Aplicacion para el programa Transportation Disadvantaged (TD)
Fares	Tarifas
Title VI Notice	Titulo VI Aviso
Title VI Complaint Form	Titulo VI Formulario de Queja
Transit Development Plan	Plan de Desarrollo de Transito y Actualizacion
Contact Us	Contactenos

Describe how the recipient monitors, evaluates, and updates the language access plan

The MCG Public Works/Transit Division conducts ongoing needs assessments to determine how best to reach LEP persons in Manatee County, and thereby improve ongoing outreach and communication efforts. To ensure that the intent of the LEP plan remains current, staff continues to monitor and update the plan and report progress every three years. These efforts include the following actions:

- Review and update the agency Language Assistance Plan (LAP) consistent with each Title VI Program Update.
- Evaluate census data and changes in the LEP population in the service area and define emerging populations as part of each LAP update.
- Monitor the frequency of encounters with LEP language groups, as part of community outreach.
- Include LEP related question(s) in each on-board survey of bus passengers in order to estimate how many bus riders need language assistance and in what languages.
- Assess the availability of resources, including technological advances (e.g., ITS system development such as the IVR system and CAD/AVL system functionality), and the requirements for Spanish language translations.
- Assess the success in meeting the needs of the LEP persons in programs, activities, and services.
- Share the goals and objectives of the LAP with MCAT staff and provide the opportunity for staff participation in development and implementation of LAP elements.
- Identify sources of LEP assistance using MCG staff from other departments such as the Neighborhood Services Department, Human Resources Department, and the Redevelopment and Economic Opportunity Department.

Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

The MCG Public Works/Transit Division provides training opportunities for employees, including methods to assist LEP populations with timely and reasonable language assistance. The Transit Division will conduct the following activities:

- Provide information on LEP “best practices” as part of regular staff meetings and staff refresher training courses.
- Continue to focus on customer service training and guidance on communicating effectively using in-person and telephone interpreters.
- Inform staff how LEP services can be obtained.
- Emphasize the importance of responding to LEP persons through telephone communication, written communication, and in-person contact, including Travel Training outreach and assistance.
- Use multiple staff to ensure and enhance the competency of interpreters and translation services provided by the Transit Division team.
- Coordinate with the MCG library system for outreach events and other communications, with an emphasis on the LEP community.
- Communicate the goals and objectives of the LAP to MCAT staff and provide the opportunity for participation in development and implementation of LAP elements.

1-6. Determination of Site or Location of Facilities

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

Determining sites and locations for transit facilities must be accomplished in a fair and equitable manner that is in accordance with Title VI implementing regulations. **Appendix D** provides Transit Facilities & Passenger Amenities Policies and Procedures and includes the Public Works/Transit Division policy regarding the siting and location of transit facilities.

Section 2: Specific Requirements for Transit Providers

Chapter IV of FTA Circular 4702.1B provides specific requirements for all fixed route transit providers. The following information addresses these requirements, as described in the circular.

2-1. Service Standards

FTA requires all fixed route transit providers to develop quantitative standards for all fixed route modes of operation for the indicators listed below. Providers of public transportation may set additional standards as appropriate or applicable to the type of service they provide.

VEHICLE LOAD

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.

Vehicle load, or load factor, is a ratio of the number of seats on a vehicle to the number of onboard passengers on a particular route during periods of either peak or off-peak travel. Load factors are used by transit systems to determine the extent of overcrowding or the need for additional vehicles. The MCG Public Works/Transit Division monitors vehicle loads through feedback from passengers and operations staff, as well as through the Automatic Passenger Counter (APC) system and ride checks. Once overcrowding is reported, staff conducts follow-up ride checks to ensure that the vehicles assigned can accommodate peak passenger loads. In September 2015, the Transit Division achieved full fleet coverage with APCs. The APC system enables staff to monitor all bus trips to monitor the maximum load factor on a regular basis. With APC monitoring in place, the MCG Public Works/Transit Division utilize the following standard:

Monthly Average Weekday Maximum Load by Bus Trip will not exceed the maximum load factor of 1.25 percent for the assigned type of vehicle.

There may be select trips during peak season (i.e., February to April) where “trippers” are necessary to assist with over-loaded bus trips and to improve schedule adherence. The Vehicle Load-Assignment Procedures are found in **Appendix E**.

VEHICLE HEADWAY

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines.

This is a measurement of the time interval or frequency between two vehicles traveling in the same direction on the same route. Frequency of service is expressed as an increment of time. Routes with the most frequent service are the most ridership productive and typically, have the highest levels of service (i.e., in terms of the number of vehicles assigned). Generally speaking,

the MCG Public Works/Transit Division provides the same service frequency on most fixed routes during all times of the day, every 60 minutes. There are several exceptions that vary by route, by day of the week, and/or by time of day. Exceptions include the following:

- The Anna Maria Island Trolley, runs at 20 minute intervals, from 6 a.m. to 10 p.m. and at 30 minute intervals from 10 p.m. to 10:30 p.m., seven days a week.
- Route 2 operates every 30 minutes during peak hours of the day, Monday through Friday.
- Route 3 operates on a 30-minute service frequency, all day, Monday through Saturday.
- Route 99 was recently improved to a 20-minute frequency during peak hours of the day.
- Routes 13 and 201 operate on a 120-minute service frequency.

Appendix F provides specific detail on the current MCG Public Works/Transit Division vehicle headway standards and monitoring procedures.

ON-TIME PERFORMANCE

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered “on time.” An acceptable level of performance must be defined (expressed as a percentage).

The MCG Public Works/Transit Division strives to continually provide transit service in accordance with published route schedules. The Transit Division Planning staff evaluate schedule adherence and strive to improve performance, as necessary. If a bus departs more than 1 minute ahead of schedule, it is classified as “early” and if it departs more than 5 minutes behind schedule, it is classified as “late.” Buses departing in between those two service parameters are considered “on- time.” In September 2015, the Transit Division achieved full fleet coverage with deployment of Automatic Passenger Counters (APCs). The APC system enables staff to monitor on-time performance on a continuous basis. With APC monitoring in place, the Transit Division utilizes the following performance standard: All routes shall perform at better than sixty percent (60%) on-time performance with exceptions made during the peak season (February to April); and typically, “trippers” are necessary in peak season to facilitate schedule adherence and on-time performance. The standard is located in the Vehicle Headway and On-Time Performance procedure in **Appendix F**.

SERVICE AVAILABILITY

Service availability is a general measure of the distribution of routes within a transit provider’s service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk to access bus service or a one-half mile walk to access rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density.

Service availability is a measure of the distance a person must travel to gain access to transit service. Standards developed with respect to transit access would apply to existing services as well as any proposed service modifications affecting route alignment. The Manatee County Comprehensive Plan, Mass Transit Element, Policy 5.6.1.4. states that there should be a system-wide average of one bus stop every one-quarter mile (**Appendix G**). Additionally, **Appendix D** includes the Transit Division's procedure on Transit Facilities and Passenger Access which outlines how the agency will ensure convenient access to fixed-route services.

2-2. Service Policies

DISTRIBUTION OF TRANSIT AMENITIES

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit passenger amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities.

The MCG Public Works/Transit Division strives to maximize the provision of passenger amenities, and thereby provide comfort and convenience for riders. When the current amenity program started in 2014, the initial emphasis was placed on major urban corridors which serve the majority of the population and system ridership. The MCG Public Works/Transit Division continually works with local and state funding partners to ensure bus stop accessibility and a continuing ADA bus stop upgrade program for ADA compliance has been underway for the past five years (i.e., Since 2014). As part of a re-branding process approval in 2013, the Transit Division continues to provide county-owned passenger benches and passenger shelters. In addition, roadway project construction now includes provisions for accessibility and concrete pads for boarding/alighting and passenger amenities, to ensure passenger seating at every bus stop. **Appendix H** includes Manatee County's transit amenities policies and procedure.

VEHICLE ASSIGNMENT

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition.

The MCG Public Works/Transit Division assigns vehicles based upon passengers per revenue hour productivity. Simply stated, the route with the highest passengers per revenue hour productivity require the vehicles with the most seating. Bus assignments and the distribution of equipment are monitored to ensure that vehicle load/assignment policies and procedures are followed. As new buses replace older vehicles, bus assignments are rotated so that equipment in better condition is assigned to a variety of different routes, benefiting the most system users in the service area. These policies and procedures are listed in **Appendix E**.

For the 2022 Title VI Program Update, the Transit Division performed a vehicle assignment evaluation for calendar years 2019, 2020, and 2021. The results of that evaluation are included in **Appendix E**.

MAJOR SERVICE MODIFICATIONS

Major service modifications refer to the level or amount of service or fare changes that are proposed by a transit provider. Policies for major service changes may be based on the percentage of revenue hours or revenue miles that are impacted by a change measured either system-wide or route-by-route.

Transit agencies with greater than 50 vehicles in fixed route service are required to develop and adopt a standard to define “major” service changes for the purposes of Title VI service equity evaluations. While not required to adopt this standard, the MCG Public Works/Transit Division adopted such a procedure due to the relatively large amount of service provided within minority and low-income Census Block Groups in Manatee County. A “major” service modification is defined as a change that affects at least 50 percent of the route (as measured by revenue hours or one-way route mileage). For “packages” of service modifications affecting multiple routes or for system-wide service changes, a “major” service change will be a service modification impacting at least twenty-five percent (25%) of total system-wide service, as measured in terms of revenue hours or revenue miles. A copy of the Major Service Modification Procedure is attached as **Appendix I**. That procedure includes procedures for public involvement including, public meetings/public hearings, public communications, and other activities that must be completed whenever “major” service changes are proposed in keeping with Title VI requirements. The MCG Public Works/Transit Division adopted a process which guides the conduct of service equity analyses in keeping with the requirements of Title VI (**Appendix J**).

Appendix J also includes demographic profile maps depicting the location of minority and low-income populations in Manatee County. As indicated above, preparation of the demographic profile maps are not a requirement for small transit agencies. However, the Transit Division chooses to prepare these analyses in order to better serve disadvantaged populations throughout the community and also support equity analyses associated with any potential major service or fare modifications.

In those profile maps, 2019 ACS Census data is used to identify block groups with a high proportion of minority and low-income populations. Any block groups containing a higher proportion of minority or low-income persons than the countywide proportion for each corresponding group is color-coded within the map series. Specific thresholds for each population group, related to the countywide proportions, are as follows:

- **Minority Block Group** – A block group where more than 20 percent of the population is identified as a minority.
- **Low-Income Block Group** – A block group where more than 11.8 percent of the population is identified as living in poverty.

APPENDIX A:

TITLE VI NOTICE TO THE PUBLIC



Title VI Notice

Manatee County Area Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Manatee County.

For more information on Manatee County Area Transit's civil rights program, and the procedures to file a complaint, contact (941) 747-8621; email mcat@mymanatee.org; or visit our administrative office at 2411 Tallevast Road, Sarasota, FL 34243.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East building, 5th floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590



Título VI Aviso

La División de Tránsito del Condado Manatee se compromete a garantizar que ninguna persona sea excluida o negado los beneficios de sus servicios por causa de su raza, color, o nacionalidad, conforme con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea que él o ella, de forma individual o como miembro de un grupo específico de personas, ha sido objeto de discriminación bajo Título VI puede presentar una queja por escrito a la División de Tránsito del Condado Manatee.

Para mas información sobre el programa de derechos civiles de La División de Tránsito del Condado Manatee, sus procedimientos, o para procesar una queja, por favor llamar a (941) 747-8621; email mcat@mymanatee.org; o visitar nuestra oficina administrativa, la dirección cual es 2411 Tallevast Road, Sarasota, FL 34243.

Procedimientos de queja también se pueden procesar directamente con la Oficina de Derechos Civiles de la Administracion Federal de Transito: Atencion: Title VI Program Coordinator, East building, 5th floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590

APPENDIX B:

TITLE VI COMPLAINT PROCEDURE



*Manatee County, Florida
Board of County Commissioners
Transit Division Procedures Manual*

Procedure#	Title	Date Issued
18-0327	Title VI Complaint Procedure	03/01/2022

PURPOSE:

The Manatee County Public Works/Transit Division (MCAT) is required to comply with Title VI of the federal Civil Rights Act of 1964 and ensure that all services and benefits are provided without discrimination on the basis of race, color or national origin. This Title VI Complaint procedure establishes the process for local disposition of Title VI complaints, and this disposition process is consistent with Federal Transit Administration (FTA) Circular 4702.1B, dated October 1, 2012.

PROCEDURE:

A. Making a Title VI Complaint

1. Any person who feels that he or she, individually, or as a member of any class of persons, on a basis of race, color or national origin is excluded from or denied the benefits of, or subjected to discrimination under any program of activity provided by Manatee County Public Works/ Transit Division may file a written complaint. The online complaint form can be accessed via the Manatee County website, or by contacting the Transit Division at (941) 747-8621 and requesting a copy via mail or email.
2. Forms should be submitted to the Manatee County Public Works/ Transit Division, Planning Manager at the address listed below.
3. Alternative means of filing complaints, such as personal interviews by staff, are available for persons with disabilities upon request. To summarize, a Title VI complaints is submitted by one of the following methods:
 - a. **MAIL:**
ATTN: Planning Manager
Manatee County Area
Transit2411 Tallevast
Road Sarasota, FL 34243;
or
 - b. **E-Mail:** MCAT@mymanatee.org; or
 - c. **Phone:** (941) 747-8621 (i.e., personal interview.)
4. An individual may also file their Title VI complaint directly with the Federal Transit Administration (FTA) Office of Civil Rights. The link below connects to the FTA Civil Rights Complaint Form Online.

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

The completed FTA complaint form can also 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 20590

B. Investigation of Complaints

1. Upon receipt of a Title VI complaint, Transit Operations and Planning staff will review the submitted information then send the complainant an acknowledgement letter informing them whether or not the complaint will be investigated as a Title VI complaint or simply as a service complaint. The distinction in the determination is whether the complaint, on its face, is related to discrimination and the violation of civil rights.
2. Each Title VI complaint received will be entered into a separate, discrete "Title VI Complaints" database. This database is managed by the Planning Section.
3. Transit Operations and Planning staff will only investigate Title VI complaints that are received within 180 days of the alleged incident. Complaints that are more than 180 days old are too distant to validate accurately.
4. Up to 30 calendar days are provided to investigate a Title VI Complaint. If additional information is required in order to resolve the complaint, staff may contact the complainant for more information and details.
5. If the complainant cannot provide the needed additional information or details within 10 business days, staff may administratively close the complaint. This is only done when the complaint lacks sufficient details to substantiate.

C. Resolving Title VI Complaints

1. Once the investigators complete their review of substantive Title VI complaint, they will issue one of two letters to the complainant: 1) a Closure Letter; or 2) a Letter of Finding (LOF).
2. A Closure Letter summarizes the complaint and investigative findings; and explains how/why a Title VI violation did not occur; and therefore, the complaint is closed.
3. A Letter of Finding (LOF) summarizes the complaint and investigative findings; and explains what corrective actions, (e.g., additional training) or potential changes in procedure, will occur.
4. If the complainant wishes to submit a written appeal with respect to the resolution of their Title VI complaint, they will have 30 calendar days from the date of the letter to do so. Appeals are then decided by the Transit Division Manager in consultation with the Operations Chief.
5. All Title VI Complaints, Closure Letters and Letters of Finding are archived after one year; and retained for three years (or until the next Title VI Program submittal to the FTA) before disposal of hard copies. The Title VI Complaint database is maintained indefinitely.

6. Staff will ensure that any confidential medical/disability information disclosure during the complaint process, remains confidential; and is then protected from public disclosure in accordance with federal implementing regulations.

D. Response to FTA

1. If a complaint is submitted directly to FTA, the Manatee County Public Works/ Transit Division will respond with an investigative report and final corrective action plan, if appropriate. The investigative report and the corrective action plan, if appropriate, will be sent to FTA within 120 days of the receipt of the complaint from the FTA.
2. A summary of the complaint and its resolution will then be included as part of the required Title VI Update, which is submitted to the FTA every three years.

ORIGINATOR, TITLE, AND DEPARTMENT NAME:

Jonathan Roberson, Planning Manager, Public Works/Transit Division

AUTHORIZATION

William Steele, Transit Division Manager

A handwritten signature in blue ink that reads "William P. Steele". The signature is written over a horizontal line.

RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: March 1, 2022

Sunset Date: February 28, 2025

APPENDIX C:
TITLE VI COMPLAINT FORM
(ENGLISH AND SPANISH)

Do you have permission from the aggrieved party to file this complaint? YES NO

Section III

I believe the discrimination I experienced was based on (check all that apply):

- Race
- Class / Socioeconomic Status
- National Origin

Date(s) when the alleged discrimination occurred:

Location(s) where the alleged discrimination occurred:

Describe as clearly as possible what happened, and why you believe discrimination occurred. Describe all persons involved, and provide their names and contact information if possible.

Identify any person who may provide additional information to support or clarify this Title VI Complaint by providing that person's name, telephone number and/or email address.

NAME:

TELEPHONE NUMBER:

EMAIL ADDRESS:

Is there any other relevant information to further the investigation of this complaint?

What do you suggest as corrective actions to prevent a recurrence of this problem?

Section IV

If you have complained about this problem before, please provide specific details:

a. When did this happen?

b. Where did this happen?

d. Was a complaint filed with Manatee County Government?

YES

NO

If yes, please provide the date of the previous complaint.

Section V

Have you filed this complaint with any other Federal, State or local agency or with any Federal or State court?

YES

NO

If yes, check the agency or agencies that apply:

Federal Agency

Name:

Federal Court

Name:

State Agency

Name:

State Court

Name:

Local Agency

Name:

You may attach any written materials or other information that you believe is relevant to your complaint.

Signature and Date Required Below

Signature

Date

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

Manatee County Area Transit, Planning Manager
2411 Tallevast Road
Sarasota, FL 34243



Título VI

Formulario de Queja

Antes de completar este formulario, lea los procedimientos de reclamación del Título VI del Manatee County Area Transit (MCAT) ubicados en el sitio web del condado de Manatee en www.ridemcat.org o visitando la Oficina Administrativa de MCAT, ubicada en 2411 Tallevast Road (en la esquina noroeste de US Highway 301 y Tallevast Road). La siguiente información es necesaria para comprender y procesar su reclamo y para el seguimiento o la aclaración de detalles específicos. Si se requiere asistencia para completar este formulario, por favor comuníquese con la Oficina Administrativa de MCAT al (941) 747-8621. Las quejas se deben presentar dentro de los 180 días de calendario posteriores a la fecha en que se produjo la supuesta discriminación para garantizar la investigación adecuada de la queja.

Sección I

Nombre del demandante (i.e., nombre de la persona que alega discriminación):

Dirección física del demandante:

Número de teléfono (incluyendo código de área):

Dirección de correo electrónico:

Sección II

¿Está presentando esta queja en su propio nombre? SÍ NO
(Si la respuesta es afirmativa, pase a la sección III.)

De lo contrario, proporcione su nombre y relación con la persona por la que se queja.

Por favor explique por qué completó este formulario para otra persona.

¿Tiene permiso de la parte agraviada para presentar esta queja? SÍ NO

Sección III

Creo que la discriminación que experimenté se basó en (marque todos que aplican):

- Raza
- Clase / Estado socioeconómico
- Origen nacional

Fecha(s) en que ocurrió la supuesta discriminación:

Lugar(es) donde se produjo la supuesta discriminación:

Describa lo más claramente posible lo que sucedió y por qué cree que ocurrió la discriminación. Describa a todas las personas involucradas y proporcione sus nombres e información de contacto si es posible.

Identifique a cualquier persona que pueda proporcionar información adicional para respaldar o aclarar esta Demanda de Título VI proporcionando el nombre, el número de teléfono y/o la dirección de correo electrónico de esa persona.

NOMBRE:

NÚMERO DE TELÉFONO:

DIRECCIÓN DE CORREO ELECTRÓNICO:

¿Hay alguna otra información relevante para avanzar en la investigación de esta queja?

¿Qué sugiere como acciones correctivas para evitar que se repita este problema?

Sección IV

Si se ha quejado sobre este problema anteriormente, proporcione detalles específicos:

a. ¿Cuándo ocurrió esto?

b. ¿Dónde ocurrió esto?

c. ¿Se presentó una queja ante el gobierno del condado de Manatee?

SÍ

NO

En caso afirmativo, indique la fecha de la queja anterior.

Sección V

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?

SÍ

NO

En caso afirmativo, verifique la agencia o agencias que aplican:

Agencia Federal

Nombre:

Tribunal Federal

Nombre:

Agencia Estatal

Nombre:

Tribunal Estatal

Nombre:

Agencia Local

Nombre:

Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo.

Firma y fecha requeridas a continuación

Firma

Fecha

Presenta este formulario en persona a la dirección que se encuentra debajo, o envíe este formulario por correo a:

Manatee County Area Transit, Gerente de Planificación:
2411 Tallevast Road
Sarasota, FL 34243

APPENDIX D:

TRANSIT FACILITIES & PASSENGER ACCESS POLICIES AND PROCEDURES



*Manatee County, Florida
Board of County Commissioners
Transit Division Procedures Manual*

Procedure#	Title	Date Issued
12.0403	MCAT Passenger Access and Supporting Infrastructure	03/01/2022

PURPOSE:

To provide guiding principles and procedures to ensure convenient access and supportive infrastructure (i.e. boarding pads, accessible routes, sidewalks) for public transit services.

PROCEDURE:

MCAT Passenger Access and Supporting Infrastructure

The following are guiding principles to ensure convenient access to public transit

1. The Transit Division will maximize the coverage of transit service within the service area, while following a market-driven implementation strategy. Every three (3) to five (5) years, the Transit Division conducts market research and as part of that effort, determine the distance current users must travel to gain access to transit service.
2. The Transit Division will emphasize service enhancements for major corridors which serve the majority of the population and ridership.
3. The Transit Division will support and promote Transit Oriented Development designs which would shorten the walking distance from bus stops.

Evaluation

The following shall be utilized in evaluation of under-performing fixed route services:

1. Routes that are not meeting performance standards will be evaluated to determine segments where ridership exists and recommend those segments be combined with existing routes, if possible, to ensure convenient passenger access.
2. Planning staff will evaluate routes that are recommended for elimination to determine the potential impact on minority users. Paratransit "feeder" service will be considered to provide continued service, if replacement fixed-route service is not implemented.

Development Review and Construction

1. Planning staff will request that city, county, and state governmental entities include the Transit Division in the development review process for pedestrian accessibility to transit stops. Transit Division staff will recommend development that are mixed use and include multiple points of direct and convenient pedestrian access to transit stops.
2. Planning staff will support land development designs that are conducive to pedestrian activity and provide transit service access.
3. Planning and/or Logistics staff will attend pre-construction meetings so that contractors are aware of accessibility needs with respect to sidewalk and roadway construction.
4. The Transit Division will work with state and local jurisdictions on passenger boarding pads and accessible connections from sidewalks to bus stops, whenever a roadway is constructed, re-constructed, or even resurfaced. All accessibility improvements will comply with Americans with Disabilities Act (ADA) requirements/implementing regulations.

ORIGINATOR, TITLE, AND DEPARTMENT NAME:

Jonathan Roberson, Transit Division Planning Manager, Public Works

AUTHORIZATION:

William Steele, Transit Division Manager

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RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: March 1, 2022

Sunset Date: February 28, 2025

APPENDIX E: VEHICLE LOAD-ASSIGNMENT POLICIES AND PROCEDURES



*Manatee County, Florida
Board of County Commissioners
Transit Division Procedures Manual*

Procedure#
16-0513

Title
MCAT Vehicle Load and Vehicle Assignment

Date Issued:
03/01/2022

PURPOSE:

The Manatee County Government (MCG) Transit Division requires a vehicle load and vehicle assignment procedure to properly assign vehicles to fixed routes and preclude potential discrimination in service delivery operations. This procedure will guide the assignment of buses to fixed routes and address excess passenger loads, when necessary.

PROCEDURE:

MCAT Vehicle Load Policy

Transit Planning staff evaluate the maximum passenger loads for all bus routes on a periodic basis to ensure that the vehicles assigned to those routes can accommodate the maximum passenger load.

The Average Monthly Weekday Maximum Load by Trip will not exceed the maximum load factor of 1.25% for the assigned type of vehicle. However, "Trippers" will be assigned as necessary to relieve over-crowding and improve schedule adherence, especially during the peak season.

During peak season, excessive loading is common, due to tourism and tourism travel.

	Number of Vehicles	Maximum Wheelchair Passenger Capacity	Seated Passenger Capacity	Maximum Vehicle Load	Maximum Passenger Capacity
29' Hybrid Low Floor	4	2	20	1.25	25
30' Phantom	6	2	23	1.25	29
35' Hybrid Low Floor	2	2	31	1.25	39
35' Low Floor	23	2	26	1.25	33
35" Trolley	6	2	26	1.25	33
40' Hybrid Low Floor	3	2	31	1.25	39

The Fleet Division maintains a bus inventory which includes vehicle length, seating capacity, purchase date, and expected useful life of each vehicle.

Vehicle Assignment Policy

1. The largest size vehicles will be assigned to those routes that carry the highest number of passengers per revenue hour, and that carry the most overall passengers (i.e., total ridership).
2. New buses will be assigned to routes based upon factors including ridership productivity (i.e., passengers per revenue hour), maximum loads, seating capacity, and wheelchair passenger ridership.
3. Vehicles may be rotated to ensure that new equipment benefits ridership system-wide.
4. Operations staff will have daily responsibility for bus assignments and distribution of equipment within the fixed route service area.

ORIGINATOR, TITLE, AND DEPARTMENT NAME:

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William Steele, Transit Division Manager

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RELATED POLICY:

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Vehicle Assignment Evaluation

For the 2022 Title VI Program Update, the Transit Division examined the average age of revenue vehicles being assigned to each of its fixed route services. This evaluation is consistent with FTA Title VI Program requirements for large transit systems (i.e., those that operate over 50 vehicles during peak service hours) which requires those transit agencies to monitor how well they are meeting their adopted Title VI Program service standards and policies.

The monitoring exercise performed by the Manatee County Transit Division consists of an evaluation of the average age of revenue service vehicles assigned to each fixed bus route for calendar years 2019, 2020, and 2021. The results of that analysis are shown in the Vehicle Assignment Evaluation - Summary Analysis Table. Important analysis elements in that table include the following:

- The average age of all revenue vehicles assigned to each fixed bus route is shown for each one-year period.
- A three-year average age is calculated for each bus route.
- An overall system-wide three-year average age is also calculated.
- An above average (>150%) and below average (<75%) threshold is established to identify potential disparate impacts.
- The minority status of each bus route is denoted (see **Appendix J** for the definition of a minority route).

When combined with the three-year average, the minority classification assists in identifying minority routes that may be experiencing a disparate impact in terms of vehicle assignment practices being employed by operations staff. Based on above and below average thresholds, three routes were identified which required further evaluation. The following conclusions can be drawn based on an understanding of the operation of each of those three routes.

- **Palmetto (Routes 1, 13, and 201)** – Transit Division operations staff regularly assign smaller vehicles (i.e., 29-foot and 30-foot heavy duty transit vehicles) to these three routes which are interlined and operate through neighborhood streets. The smaller vehicles facilitate safer movements through those neighborhood streets. Since 2015, the Transit Division has shifted to a policy of purchasing only 35' buses for fixed-route operations. The result is that the smaller vehicles, which are 2007 and 2011 models, are assigned more often to the Palmetto services. The practice of assigning smaller vehicles to the Palmetto service routes will eventually be modified as the 2007 and 2011 model vehicles are replaced by the 35' buses.
- **AMI Trolley (Route 5)** – The Transit Division operates a dedicated fleet of Trolley-replica vehicles on the Anna Maria Island (AMI) Trolley service. The AMI Trolley service span includes seven day a week service and a longer daily service span when compared to the Transit Division's other fixed route bus services. Consequently, the Trolley replica vehicles accumulate mileage at a faster rate than the rest of the fixed-route fleet. Replacement of those vehicles occurs before the standard 12-year useful life applied to the other heavy duty transit vehicles used for fixed-route operations which results in an average that is

lower than many of the other services. In addition, two new Trolley vehicles were delivered in 2020 which further reduced the average of the Trolley fleet in years 2020 and 2021.

- Skyway Connection (Route 203)** – Since its initial launch in 2016, vehicle assignment on the Skyway Connection service has consisted of newer vehicles in the fleet. The justification for that assignment policy includes the steep grade operations over the Sunshine Skyway bridge, the required daily miles of service, and the distance travelled from the Transit Division garage and critical maintenance functions. When combined, these factors require that reliable buses are assigned consistently to minimize the possibility of service interruptions due to traffic conditions, breakdowns, and detours around the Tampa Bay whenever there is a closure on the Sunshine Skyway bridge.

VEHICLE ASSIGNMENT EVALUATION – SUMMARY ANALYSIS

Route Number	Route Name	Average Age (2019)	Average Age (2020)	Average Age (2021)	Three-Year Age Average	Route Classification
1, 13, 201	Palmetto	9.1	10.2	10.4	9.9	Minority
2	East Bradenton	6.7	6.5	4.5	5.9	Minority
3	Manatee Avenue	7.5	8.1	7.8	7.8	Minority
4	9th Avenue East and West	6.0	6.3	6.2	6.2	Minority
5	Anna Maria Island Trolley	7.3	4.0	2.8	4.7	Non-Minority
6	Cortez Road	5.0	5.6	5.8	5.5	Minority
8	Oneco-Bayshore	3.8	6.6	7.3	5.9	Minority
9	9th Avenue W/26 th Street	10.0	10.6	4.4	8.3	Minority
12	State Road 70	7.1	6.3	5.7	6.4	Minority
16	15th Street East	6.0	8.1	10.0	8.0	Minority
75	Beach ConneXion	6.9	7.8	7.5	7.4	Non-Minority
99	Bradenton-Sarasota	7.0	7.8	7.4	7.4	Minority
203	Skyway ConneXion	1.3	2.1	2.9	2.1	Minority
System-Wide Three-Year Average					6.4	
75% of the System-Wide Average					4.8	
150% of the System-Wide Average					9.6	

APPENDIX F:

VEHICLE HEADWAY POLICIES AND PROCEDURES



*Manatee County, Florida
Board of County Commissioners
Transit Division Procedures Manual*

Procedure#	Title	Date Issued
16-0510	Transit Division Vehicle Headway and On-Time Performance	03/01/2022

PURPOSE:

1. To establish a process for any proposed headway (i.e., service frequency) modification for fixed route/fixed schedule service.
2. To establish a process for monitoring on-time performance for Transit/Trolley fixed routes.

PROCEDURE:

MCAT Vehicle Headway and On Time Performance

The following shall guide vehicle headway modifications:

1. The Transit Division will continue to develop transit routes with a defined alignment and fixed schedule for effective service delivery. To the extent possible, fixed routes will operate with a defined and regular service frequency.
2. Routes and schedules are monitored quarterly and fully analyzed annually to improve system efficiencies and connectivity.
3. The Transit Division adopts a 60% goal for system wide on-time performance (on-time is defined as a bus departure one (1) minute before and up to five (5) minutes after scheduled departure times at a designated time point). On-time performance standards will be revised periodically. The Automatic Passenger Counter (APC) system will serve as the mechanism to monitor on-time performance. Service frequency may be altered to refine running time and on-time performance.

Evaluation and Assignment

1. Transit Operations and Planning staff will periodically evaluate customer complaints, road supervisor reports and ride check/APC reports which pertain to on-time performance.
2. Transit Operations and Planning staff will evaluate on-time performance by route periodically. Segment summary reports from the APC will be used to help determine the cause for delays and recommend changes in scheduling or routing as needed.
3. Planning staff will evaluate system wide on-time performance; and this evaluation will be used to develop a process to improve performance over time.
4. Passenger productivity (i.e., passengers per revenue hour and mile) will be evaluated by Planning staff and coupled with on-time performance to determine the need for improved service frequency. The highest performing (i.e., Core Network) routes that have the highest total annual ridership are targeted for improved service frequency, initially.

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Jonathan Roberson, Transit Division Planning Manager, Public Works

AUTHORIZATION:

William Steele, Transit Division Manager

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RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: March 1, 2022

Sunset Date: February 28, 2025

APPENDIX G:
MANATEE COUNTY
COMPREHENSIVE PLAN, MASS
TRANSIT ELEMENT, EXCERPT

MASS TRANSIT SUB-ELEMENT

GOAL 5.6

A Full Range of Transportation Alternatives for Residents and Visitors with a Safe, Efficient, Attractive, and Financially-Feasible Transit System, Acting as the Primary Alternative to the Single Occupant Automobile.

Objective 5.6.1. Level of Service Standards for Line Haul (Fixed Route) Transit.

Establish and use the following infrastructure and performance standards to maintain or improve current levels of service through appropriate capital and operating expenditures on the line haul transit system.

Policy 5.6.1.1. Provide and fund, subject to limitations described in Policy 5.6.1.3 below, a fixed route (line haul) mass transit system which is designed to provide service at a projected level of 9.81 Annual Passenger Miles per Capita. As used in calculating this per capita infrastructure standard, population shall be total resident population for Manatee County, within both incorporated and unincorporated areas.

Implementation Mechanism:

- (a) Annual calculation by Manatee County Area Transit (MCAT) of total projected demand (number of passenger miles) on the line haul transit system within any one-year, current or future, using:

$$\text{Demand} = \text{Projected Annual Passenger Miles} = (\text{Projected Total Resident Population}) \times (9.81)$$

Policy 5.6.1.2. Project total annual capital and operating expenditures necessary to address the demand projected using the adopted infrastructure standard, contained in Policy 5.6.1.1 above. Demand shall be projected by calculating Annual Projected Passenger Miles, and by using this Annual Projected Passenger Mile Total for any year to project annual operating costs.

Policy 5.6.1.3. Address the increased demand for line haul transit service which is projected to occur concurrent with increase in total resident population by budgeting, and expending as necessary, local funding to address the projected annual operating and capital costs, as calculated pursuant to Policy 5.6.1.2 above.

Implementation Mechanism(s):

- (a) Manatee County Area Transit (MCAT) calculation of projected one-and five-year capital and operating costs, as described in this policy, and submittal to the Financial Management Department as part of the annual County budget process. Also, determine local share of the one-year projected capital and operating expenditures, and estimate projected local share of capital and operating expenditures for years two (2) through five (5).
- (b) Manatee County Planning Department providing MCAT with annual population projections to facilitate MCAT calculation of capital and operating expenditures.

Policy 5.6.1.4. Establish the following performance standards for design and operation of the fixed route transit system. Compliance with these performance standards shall be achieved where financially-feasible. These performance standards shall be used to evaluate the quality of the transit system's service, achievement of intermodal pedestrian/transit coordination efforts, and shall be utilized to review proposed capital expenditures for compliance with the adopted level of service standards.

- (1) A systemwide average of one (1) bus stop every one-quarter ($\frac{1}{4}$) mile.
- (2) A systemwide average of one (1) bus shelter every one and one-half ($1\frac{1}{2}$) route miles.

Implementation Mechanism(s):

- (a) Periodic systemwide assessments by Manatee County Area Transit (MCAT) to ensure compliance with these performance standards.
- (b) Budget request by MCAT, and to the Financial Management Department where required and where feasible, to fund systemwide compliance with these performance standards.

Policy 5.6.1.5. Continue to develop implementation strategies to reduce transit vehicle headways during peak hour periods to improve overall line haul transit services.

Implementation Mechanism:

- (a) Coordinate between Community Services, Transit Division, Planning, and Public Works Departments to develop implementation strategies.

Objective 5.6.2. Level of Service Standards for Paratransit.

Establish and use the following infrastructure standard to maintain current levels of service through appropriate capital and operating expenditures on the paratransit (demand-response) bus system.

Policy 5.6.2.1. Continue to provide and fund, subject to limitations described in Policy 5.6.2.3 below, a demand-response paratransit system which is designed to provide service at a projected level of 16.03 Annual Passenger Miles per Elderly and Handicapped (E&H) Person. As used in calculating this per unit infrastructure standard, E&H population shall be based on a constant percentage (32.2 percent) of total resident and seasonal population for Manatee County, within both incorporated and unincorporated areas. New projections of E&H population may be derived from appropriate data and may update the 32.2 percent factor adopted for projecting total E&H population.

Implementation Mechanism:

- (a) Annual calculation by Manatee County Area Transit (MCAT) of total projected demand (number of passenger miles) on the demand-response paratransit system within any one-year, current or future using:

$$\text{Demand} = \text{Projected Annual Passenger Miles} = (\text{Projected Total E\&H Population}) \times (16.03)$$

Policy 5.6.2.2. Project total annual capital and operating expenditures necessary to address the demand projected using the adopted infrastructure standard, contained in Policy 5.6.2.1 above. Demand shall be projected by calculating Annual Projected Passenger Miles, and by using this Annual Projected Passenger Mile total for any year to project annual operating and capital costs.

Policy 5.6.2.3. Address the increased demand for demand-response paratransit service which is projected to occur concurrent with increase in total E&H population by budgeting, and expending as necessary, local funding to address the projected annual operating and capital costs, as calculated pursuant to Policy 5.6.2.1 above.

Implementation Mechanism(s):

- (a) Manatee County Area Transit (MCAT) calculation of projected one- and five-year capital and operating costs, as described in this policy, and submittal to the Financial Management Department as part of the annual County budget process. Also, determine local share of the one-year projected capital and operating expenditures, and estimate projected local share of capital and operating expenditures for years two (2) through five (5).
- (b) Manatee County Planning Department providing MCAT with annual total population, and percentage of E&H persons to facilitate MCAT calculation of capital and operating expenditures.

Policy 5.6.2.4. Maintain the following performance standards for design and operation of the demand-response paratransit system. These performance standards shall be used to evaluate the quality of paratransit service, and shall be utilized to review proposed capital expenditures for the effect which these expenditures are (or are not) having on maintenance of a quality paratransit service:

- (1) Availability of Service: Entire Manatee County Future Transit Service Area and any other area west of I-75.
- (2) Door-to-door service.
- (3) Minimum advance notice required for pick-up: twenty-four (24) hours.
- (4) Schedule pick up time within sixty (60) minutes of requested pick-up time.
- (5) Comply with Americans with Disabilities Act service standards.

Implementation Mechanism:

- (a) Manatee County Area Transit action to ensure policy compliance.

Objective 5.6.3. Coordinated Transit and Alternative Modes Planning.

Achieve efficient, coordinated transit and alternative modes systems. (See also Objectives 5.6.5 and 5.6.6 and associated policies.)

Policy 5.6.3.1. Encourage the consolidation of all passenger transportation services within the County to eliminate duplication of services.

Implementation Mechanism:

- (a) Manatee County Area Transit action to ensure policy compliance.

Policy 5.6.3.2. Maintain the designation of Community Transportation Coordinator as offered by the State Commission for Transportation Disadvantaged and the Sarasota/Manatee Metropolitan Planning Organization (MPO) under Ch. 427, F.S. and Ch. 41-2, F.A.C.

Implementation Mechanism:

- (a) Manatee County Area Transit action to ensure policy compliance.

Policy 5.6.3.3. Ensure appropriate consistency between the operation and plans of Manatee County Area Transit and the MPO 2030 Long-Range Transportation Plan, the FDOT 2025 Florida Transportation Plan, Florida's Strategic Intermodal System Plan, the Short Range Strategic Plan, and approved Five-Year Work Program, and other federal, state, or local planning requirements or regulations to maximize intermodal transportation development.

Implementation Mechanism:

- (a) Manatee County Area Transit coordination with Planning and Public Works Departments to ensure policy compliance.

Policy 5.6.3.4. Consider, and include as necessary, transit and alternative modes corridor protection and reservation through the inclusion of appropriate rail and bus transit corridors, and alternative modes corridors on appropriate Right-of-Way Protection or Reservation Maps (see Traffic Circulation portion of this Transportation Element) to include pull-outs for transit in high-traffic areas and well-designed, pedestrian-friendly stops in appropriate locations of high transit use.

Implementation Mechanism:

-
- (a) Manatee County Area Transit coordination with Planning and Transportation Departments to ensure policy compliance.

Policy 5.6.3.5. Coordinate with the transit systems and alternative mode systems of Hillsborough, Pinellas, and Sarasota Counties to identify, and implement when feasible, inter-county services to increase transit and alternative modes systems' utility (refer to Policy 5.6.3.6).

Implementation Mechanism:

- (a) Manatee County Area Transit coordination with Planning and Transportation Departments to effectuate this policy.

Policy 5.6.3.6. Continue to expand the existing seamless transit service between Manatee and Sarasota Counties.

Objective 5.6.4. Elderly and Handicapped (E&H) and Transportation Disadvantaged (TD).

An adequate transit system for the E&H and TD.

Policy 5.6.4.1. Maintain line haul and paratransit systems which, through use of kneeler and wheelchair equipped coaches on line haul service, and through use of wheelchair lift equipped coaches for paratransit, allow for system accessibility to the Elderly and Handicapped having a public transportation disability.

Implementation Mechanism:

- (a) Manatee County Area Transit action to ensure policy compliance.

Policy 5.6.4.2. Provide information services on transit to the visually- and hearing-impaired, through appropriate social/human service agencies, and through public service announcements.

Implementation Mechanism(s):

- (a) Manatee County Area Transit action to ensure policy compliance.
- (b) Manatee County Area Transit to emphasize promotion of its services within concentrated areas of transport disadvantaged.

Policy 5.6.4.3. Offer service to the E&H and the TD at the most reasonable possible fares by maximizing funding sources for this service.

Implementation Mechanism(s):

- (a) Manatee County Area Transit action to ensure policy compliance.
- (b) Manatee County Area Transit to emphasize promotion of its services within concentrated areas of transportation disadvantaged.

Policy 5.6.4.4. Provide safety and sensitivity training for all transit personnel.

Implementation Mechanism:

- (a) Manatee County Area Transit action to ensure policy compliance.

Policy 5.6.4.5. Coordinate pick-ups of sponsored para-transit clientele with pick-ups of non-sponsored users.

Implementation Mechanism(s):

- (a) Manatee County Area Transit action to ensure policy compliance.
- (b) Manatee County Area Transit to emphasize promotion of its services at destination and centralized locations in areas of transport disadvantaged.

Policy 5.6.4.6. Comply with regulations issued by the Federal Transit Administration, including Section 504 regulations, Americans with Disabilities Act (ADA) and other federally imposed regulations. Also, implement the recommendations contained within the five-year Transit Development Plan.

Implementation Mechanism:

- (a) Manatee County Area Transit action to ensure policy compliance.

Objective 5.6.5. Coordination of Land Use, Transit and Alternative Modes Planning.

A pattern of land uses conducive to an efficient and cost effective transit and alternative modes systems.

Policy 5.6.5.1. Require that Manatee County Area Transit utilize the Comprehensive Plan database of:

- Existing land uses by square mile.
- Future land uses by appropriate geographic areas.
- Any "growth tracking" system implemented to monitor and evaluate the magnitude and characteristics of new development or redevelopment to evaluate potential transit demand as one input into transit route structuring, and other studies for increasing efficiency of the transit systems.

Policy 5.6.5.2. Expand transit service using the Transit Service Area Map as a guide to developing future transit routes and service areas.

- Delineates existing transit service areas, as well as areas near these service areas, that will have high residential densities.
- Shows geographical connections between major trip attractors and major trip generators.
- Specifies areas suitable for terminals and transfer points.

Policy 5.6.5.3. Provide transit and alternative modes service to unserved areas where efficient and feasible, continue to review feasibility to serve Port Manatee and commercial aviation facilities. (Refer to Objective 5.6.6)

Implementation Mechanism:

- (a) Manatee County Area Transit action to ensure policy compliance.

Policy 5.6.5.4. Determine the feasibility and time frame for developing alternative transportation options to the single occupant automobile. These actions shall include review of an express bus system and routes, including park-n-ride locations and facilities, and alternative modes within low density residential areas and employment, commerce, recreational, and industrial centers of Manatee County. (See also Objectives 5.6.5, 5.6.6, 5.6.7 and associated Policies.)

Implementation Mechanism:

- (a) Manatee County Planning Department, Community Services Department (Transit Division), Public Works Department coordination to implement this Policy.

Policy 5.6.5.5. Require that attractive, well-designed internal transit stop facilities be provided within nonresidential development of greater than one hundred thousand (100,000) square feet and for residential development of one hundred (100) dwelling units or more and for neotraditional and mixed use development projects. Such internal transit stops shall include provision of pedestrian and bicycle shelter facilities consistent with the design standards listed in Policy 5.6.6.2. The Transit Division may waive this requirement when safe, accessible and adequate transit stop facilities exist within the surrounding area for the existing and projected population.

Implementation Mechanism:

-
- (a) Land development regulations developed pursuant to § 163.3202, F.S., and consistent with this policy.

Objective 5.6.6. Transit as an Attractive, Convenient Alternative to Single Occupancy Vehicles.

Reduce traffic congestion along constrained transportation corridors, intersections and downtown areas, promote economic development through provision of convenient and accessible transit linking employees with employment centers, and reduce pollution through integration of the walking, bicycling and transit systems.

Policy 5.6.6.1. Explore funding options to improve transit availability by implementing strategies identified in the Public Transit System Analysis. Such strategies may include:

- Decreasing bus headways to thirty (30) minutes or less on U.S. 41 and major east-west routes;
- Increasing service frequency during rush hours;
- Expanding service hours;
- Bus Rapid Transit (BRT) along U.S. 41;
- Signal priority at congested intersections; and
- Local circulator busses to serve residential areas and employment and commercial centers.

Implementation Mechanism:

- (a) Coordination between MPO, MCAT, Planning, and Public Works Departments.

Policy 5.6.6.2. Increase the attractiveness of transit as a transportation alternative by providing well designed, safe, and attractive transit stops and transfer stations. Design considerations may include:

- Signature shelter design;
- Lighting conditions;
- Compliance with the Americans with Disabilities Act;
- Landscaping and Tree Canopy;
- Protection from the weather;
- Information kiosks at shelters displaying bus schedules and times;
- Waste receptacles;
- Designated smoking areas at transfer stations;
- Sidewalks connecting to bus stops and transfer stations;
- Bike racks;
- Use of Crime Prevention Through Environmental Design principles;
- Setbacks from higher speed travel lanes;
- Accessibility to marked, signalized pedestrian cross walks;
- Co-location of shelters with commercial, educational, and employment centers; and
- Other pedestrian amenities which would increase attractiveness and convenience for transit users.

Implementation Mechanism:

- (a) MCAT to explore funding options.

Policy 5.6.6.3. By 2012, conduct study regarding the feasibility of implementing transit-oriented design.

Implementation Mechanism:

- (a) MCAT, MPO and Planning Department coordinate with all appropriate jurisdictions and agencies.

Objective 5.6.7. Alternative Transportation—Interagency Coordination.

Coordinated planning with local, regional, state, and federal agencies for alternative transportation modes including, but not limited to, bus rapid transit, express bus, car pooling, park and ride, water taxi, light rail, and other non-automotive modes.

Policy 5.6.7.1. By 2012, develop and maintain an Alternative Transportation Modes Map of Manatee County and its municipalities to provide a comprehensive approach to the development of a system of alternative transportation modes.

Implementation Mechanism:

- (a) Manatee County Planning Department to initiate, coordinate and develop a map showing alternative transportation modes. Coordination between the MPO, local municipalities, adjacent jurisdictions and the Planning, Public Works, Community Service Departments to develop map.

Policy 5.6.7.2. Utilize the comprehensive plans of jurisdictions within Manatee County and analyses of development trends to assist in planning for the development and construction of alternative transportation modes to ensure that such modes, to the maximum extent feasible, will be coordinated and facilitated in time and place to meet urban growth and development patterns.

Implementation Mechanism:

- (a) Manatee County Planning, Community Services, and Public Works Departments coordination consistent with this policy.

Policy 5.6.7.3. Promote and optimize cooperation and coordination between Manatee County, the local municipalities, adjacent jurisdictions, and the development community to effectively plan for alternative transportation modes to meet the current and future needs of Manatee County.

Policy 5.6.7.4. Coordinate the features within Comprehensive Plans Capital Improvement Programs to ensure the development and construction of alternative transportation modes will be facilitated and coordinated in time and place to meet growth and development patterns to the maximum extent feasible.

Policy 5.6.7.5. Prioritize and seek funding to implement alternative transportation projects.

Implementation Mechanism:

- (a) Manatee County Planning, Community Services, and Public Works Department coordination and notification of applicable local, state, and federal agencies of alternative modes projects.

APPENDIX H: TRANSIT AMENITIES POLICIES AND PROCEDURES



*Manatee County, Florida
Board of County Commissioners
Transit Division Procedures Manual*

Procedure#
14-0800

Title
Transit Passenger Amenities

Date Issued
03/01/2022

PURPOSE:

To provide guidance to the provision of transit passenger amenities at designated bus stops.

PROCEDURE:

Transit Amenities

The following shall guide transit amenity placement:

1. Passenger shelters will be installed at high usage stops throughout the MCAT service area (i.e., daily passenger boardings of 10 or more). Passenger shelters shall also be located where major line haul routes connect to facilitate passenger transfers and at defined major activity centers.
2. Passenger benches will be installed to provide seating at bus stops where a shelter is not warranted.
3. Bicycle racks will be installed at major transfer points and other bus stops where installation can be considered appropriate based on ridership data and market demand.
4. All fixed route buses and trolley vehicles will be equipped with bike racks.
5. All passenger amenity installations will be constructed in accordance with Americans with Disabilities Act (ADA) implementation regulations.

Evaluation and Placement

1. Transit Division staff will evaluate each stop to determine the appropriate amenities for that particular location. This determination will be based on ridership volumes, space available for amenities and market demand. Amenities may include, but are not limited to, shelters, benches, other seating arrangements, bicycle racks and trash receptacles.
2. If a request for additional passenger amenities is received, Transit Division staff will evaluate each request on a case-by-case basis.
3. Transit Division staff will work with individual jurisdictions and property owners, as needed, to place passenger amenities at appropriate locations.
4. All amenity improvements that are also accessibility improvements will conform to the Americans with Disabilities Act (ADA) requirements/implementing regulations. "Typical" design sections will be utilized to facilitate bus stop accessibility improvements system wide; and this approach will continue until every bus stop includes accessibility features and passenger seating.

ORIGINATOR, TITLE, AND DEPARTMENT NAME:

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AUTHORIZATION:

William Steele, Transit Division Manager



RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: March 1, 2022

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APPENDIX I:

MCAT MAJOR SERVICE MODIFICATION PROCEDURE



Manatee County, Florida
Board of County Commissioners
Transit Division Procedures Manual

Procedure#	Title	Date Issued:
16-0511	MCAT Major Service Modification Procedure	03/01/2022

To establish a process to properly serve the diverse needs of current and potential transit customers, and continually provide service equity to the communities served in Manatee County and ensure adequate system coverage.

PROCEDURE:

The Transit Division must utilize innovative thinking, sound planning and analytical principles to meet the diverse needs within the community. It is most important to develop a transit system that provides service area coverage and equity in terms of service levels and the provision of passenger amenities to low-income and minority segments of the community served. Title VI, the Federal Civil Rights legislation requires all transit agencies to provide transit service and amenities without regard to race, color or national origin. Moreover, it is important to provide transit service and amenities that are safe, reliable, cost effective, convenient, and compliant with applicable state and federal regulations, user-friendly and focused on customer needs.

Carefully planning the allocation of resources is very important to maximize the benefits of service to transit riders, while ensuring that the service provided is productive and cost effective. Maintaining this balance requires an established policy for service standards that are designed to target levels of productivity, efficiency, and quality.

This procedure aims to establish a standard for how service is evaluated and modified to ensure that the transit system is developed in an efficient and cost-effective manner, while respecting the federal Title VI regulation to ensure service equity for low income and minority populations.

Service Performance Evaluation

Each route in the Manatee County transit system will be evaluated on an ongoing and annual basis. This evaluation will consist of three variables: (1) Route productivity (i.e., ridership per revenue hour and mile); (2) Ridership productivity comparative to a defined average for that specific service type; and (3) Trends in route productivity and total ridership. The higher the route productivity and recent ridership growth, the more carefully a service modification should be studied and analyzed, prior to any implementation. A favorable trend line should be monitored, so that any service modification furthers that favorable trend and does not reverse or hinder continued ridership growth and productivity.

Each route will be compared based upon the system average for each service criteria (i.e., route productivity, comparative to a "system" average, and trend analysis). Those fixed routes falling below 75% of the system average for each service type/hierarchy will be targeted for further evaluation. However, it will be important to consider the recent trends in ridership and productivity and consider the fact that "new" routes require a substantial period of time to develop and compare favorably to long-established routes; and service frequency enhancements or realignments also require time to "fully develop".

As Transit Division staff conduct the service performance evaluation, it is also important to analyze routes based upon service type and to distinguish line haul service, local "feeder" routes, service routes and commuter express services. Establishing a hierarchy of service types is critical to the proper analysis and comparison of the transit services provided by Manatee County.

Major Service Modifications

FTA Title VI implementing regulations require agencies with more than 50 vehicles in peak fixed route service to adopt a numerical standard defining what constitutes a "major" service modification. Despite its small size, MCAT has chosen to adopt such a standard and to meet the Title VI requirements imposed on larger agencies. This supports the effort to ensure minority and low-income communities in the Manatee County service area are not disproportionately impacted by major service modifications.

Single Route

A "major" service modification is a change that affects at least 50 percent of a single fixed transit route (as measured in terms of average weekday revenue hours and/or average weekday revenue mileage).

Multiple Routes

Packages of service modifications (i.e., affecting more than one fixed route) are evaluated on a system-wide basis. For packages of modifications, a "major" service modification is a change that affects 25 percent of system-wide average for weekday revenue hours or for average weekday revenue miles.

Service Additions

The addition of service is evaluated on a system-wide basis. For service increases greater than 25 percent of system-wide revenue hours, revenue miles or revenue trips, these additional services are considered a "major" service modification. The impact of service additions upon minority and low-income populations shall be considered in the context of MCAT's 10-Year Transit Development Plan. However, Title VI regulations do not require service equity analysis for "temporary" additions of service. A temporary service change which has a set start and end date or that does not remain in effect after a 12 month period will not be considered a major service modification.

Adverse Effect

An adverse effect is defined as a reduction in service frequency, elimination of part or all of a route, including service span adjustments. MCAT will consider the degree of adverse effects in the form of an equity analysis when planning for major service changes.

Disparate Impact Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service change are borne disproportionately by minority populations. For the purpose of this policy, a minority population is defined as any readily identifiable group of minority persons who live in geographical proximity (i.e., ¼ mile) of the proposed major service change.

A disparate impact is defined as occurring whenever the expected distribution of adverse impacts to minority populations is greater than 20 percentage points different from the current minority population served.

Disproportionate Burden Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service change are borne disproportionately by low-income populations. For the purpose of this policy, low-income populations are defined as any readily identifiable group of persons identified by the US Census as living below poverty that are in geographical proximity (i.e., ¼ mile) of the proposed major service change.

A disproportionate burden is defined as occurring whenever the expected distribution of adverse impacts to low-income populations is greater than 20 percentage points different from the current low-income population served.

Process for major service modifications

1. Transit Division staff will utilize an analytical approach to identify potential service modifications. This will include up-to-date ridership and a comparative evaluation process, as well as on-time performance and ride check/Automatic Passenger Counter (APC) data.
2. Investigation will be conducted of the proposed service modification(s) and the potential impact on ridership, route mileage, hours of revenue service, vehicle requirements, and operating cost.
3. A Service Equity Analysis will be performed to ensure major service modifications do not create adverse impacts relative to defined low-income and minority populations. (The Transit Division chooses to conduct service and equity analyses of major service changes even though Title VI does not require transit providers with less than 50 vehicles in maximum service to do so.)
4. A public involvement process is also required. A press release advising the public of these meetings will be released no later than two weeks prior to each meeting. In addition, meeting notices will be available on all MCAT Fixed Route and Paratransit buses, all Stations, transfer points, the MCAT website, as well as the Public Works Twitter feed.
5. One or more informal style public meetings on the proposed service modification(s) will be held to engage the affected community and receive valuable feedback.
6. A formal public hearing to receive feedback from fixed-route bus system users and the general public will be held. This public hearing can be a staff-led hearing.
7. The public involvement process will include elements of the Language Assistance Plan described in the Transit Division's adopted Title VI policy
8. The presentation of findings and a formal recommendation by Transit Division staff to the Board of County Commissioners (BCC) is required. There is the opportunity for public comment at meetings when a major service modification is deemed to further transit service, optimize service delivery operations, enhance ridership, and/or improve cost effectiveness. The BCC will make the final decision as to whether to implement the proposed major service modification, in conjunction with the opportunity for public comment.

Minor Service Modifications

A minor service modification is a service change that affects less than 50 percent of an individual fixed transit route (as measured in terms of average weekday revenue hours or average weekday revenue miles) or less than 25 percent of system-wide average weekday revenue hours or miles when multiple fixed routes are impacted by changes. The process for minor service changes are as follows:

1. Transit Division staff will utilize an analytical approach to identify potential service modifications. This will include up-to-date ridership and a comparative evaluation process, as well as on-time performance and ride check data.
2. Investigation of a proposed service modification and the potential impact on ridership, route mileage, hours of revenue service, vehicle requirements, and operating cost.
3. Transit Division staff may conduct one or more informal public meetings on the proposed change. However, this is not required.
4. If a public meeting is held, notice regarding the meeting will be available on all MCAT Fixed Route and Paratransit buses, all Stations/Transfer points, the MCAT website, as well as the Public Works Twitter feed.
5. The public involvement process may include elements of the Language Assistance Plan described in the Transit Division's adopted Title VI policy.
6. Transit Division staff will implement the service modification based upon internal review and a recommendation from the Transit Operations Chief and Planning staff to the Transit Division Manager with review by the Manatee County Public Works Director.

A minor service change may include changes in routing and/or scheduling which are time-sensitive and critical to daily operations (i.e., detour, road closure, safety issue). These changes would not require a public meeting. However, minor service changes typically require public notification and in some cases, information and communications with the County Administrator's staff.

This procedure for major service changes will be carefully reviewed every three years as part of the Transit Division's FTA-required Title VI program update. New/updated procedures will be incorporated as part of the Board of County Commissioners review process for approval for the Transit Division's federally required Title VI program update.

ORIGINATOR, TITLE, AND DEPARTMENT NAME:

Jonathan Roberson, Planning Section Manager, Public Works/Transit Division

AUTHORIZATION:

William Steele, Transit Division Manager



RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: March 1, 2022

Sunset Date: February 28, 2025

APPENDIX J: SERVICE EQUITY ANALYSIS PROCEDURE



*Manatee County, Florida
Board of County Commissioners
Transit Division Procedures Manual*

Procedure# 16-0512	Title Major Service Modifications-Service Equity Analysis	Date Issued: 03/01/2022
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PURPOSE:

Manatee County's Public Works/Transit Division adopted a Major Service Modification Policy for compliance with the requirements of the Federal Transit Administration's (FTA) Title VI implementing regulations. Due to the relatively large percentage of minority populations in Manatee County and consistent with the adopted Major Service Modifications Policy, the Manatee County Public Works/Transit Division conducts a service equity analysis whenever there is a major service modification proposed by staff.

PROCEDURE:

A. Transit Planner

1. Determine if the proposed change or package of changes, meets the defined standard for a major service modification according to the approved Major Service Modifications Procedure for Manatee County Area Transit or "MCAT".
2. Each of the service policies and standards adopted as part of the Transit Division's Title VI Procedure may be evaluated with respect to existing and proposed service and the impact of service changes on minority and non-minority routes. However, specific focus is necessary with respect to service availability and service frequency. Changes or packages of service changes that do not create disparity between minority and non-minority routes will be considered to have no disproportionate impact.
3. For the purposes of this procedure, all of MCAT's existing fixed bus routes are evaluated in terms of one-way mileage to determine whether each route (or sections thereof) should be classified as a minority or non-minority route. A route having more than 50 percent of its one-way mileage within or adjacent to minority Census Block Groups, as defined in the Public Works/Transit Division's Title VI Procedure, determines its minority or non-minority classification.
4. Refer to the attached table (Attachment "A") for the results of that GIS evaluation and the classification of individual routes as minority or non-minority. Minority and non-minority route classifications are updated every three years as part of the required Title VI Program update for transit agencies.
5. The following Service Standards are carefully and individually evaluated in order to determine the potential Title VI impacts of applicable major service modifications:
 - Vehicle Loads
 - Vehicle Headways
 - On-Time Performance
 - Service Availability (Route Coverage)
 - Transit Amenities Distribution
 - Vehicle Assignments

B. Transit Planning Manager

1. Upon receipt of notification from the Planner, the Transit Planning Manager reviews the above analysis and shares these results with the Transit Division Manager. The Transit Planning Manager is responsible for developing, with the assistance of the Transit Planner, any proposals to modify or adjust the proposed major service modifications in order to mitigate impacts of proposed major service modifications for minority populations.
2. The Transit Planning Manager ensures that "Major Service Modifications" follow the established public involvement process, including review/approval by the Manatee County Board of County Commissioners.

ORIGINATOR, TITLE, AND DEPARTMENT NAME:

Jonathan Roberson, Planning Section Manager, Public Works/Transit Division

AUTHORIZATION:

William Steele, Transit Division Manager

A handwritten signature in blue ink that reads "William P. Steele" is written over a horizontal line.

RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: March 1, 2022

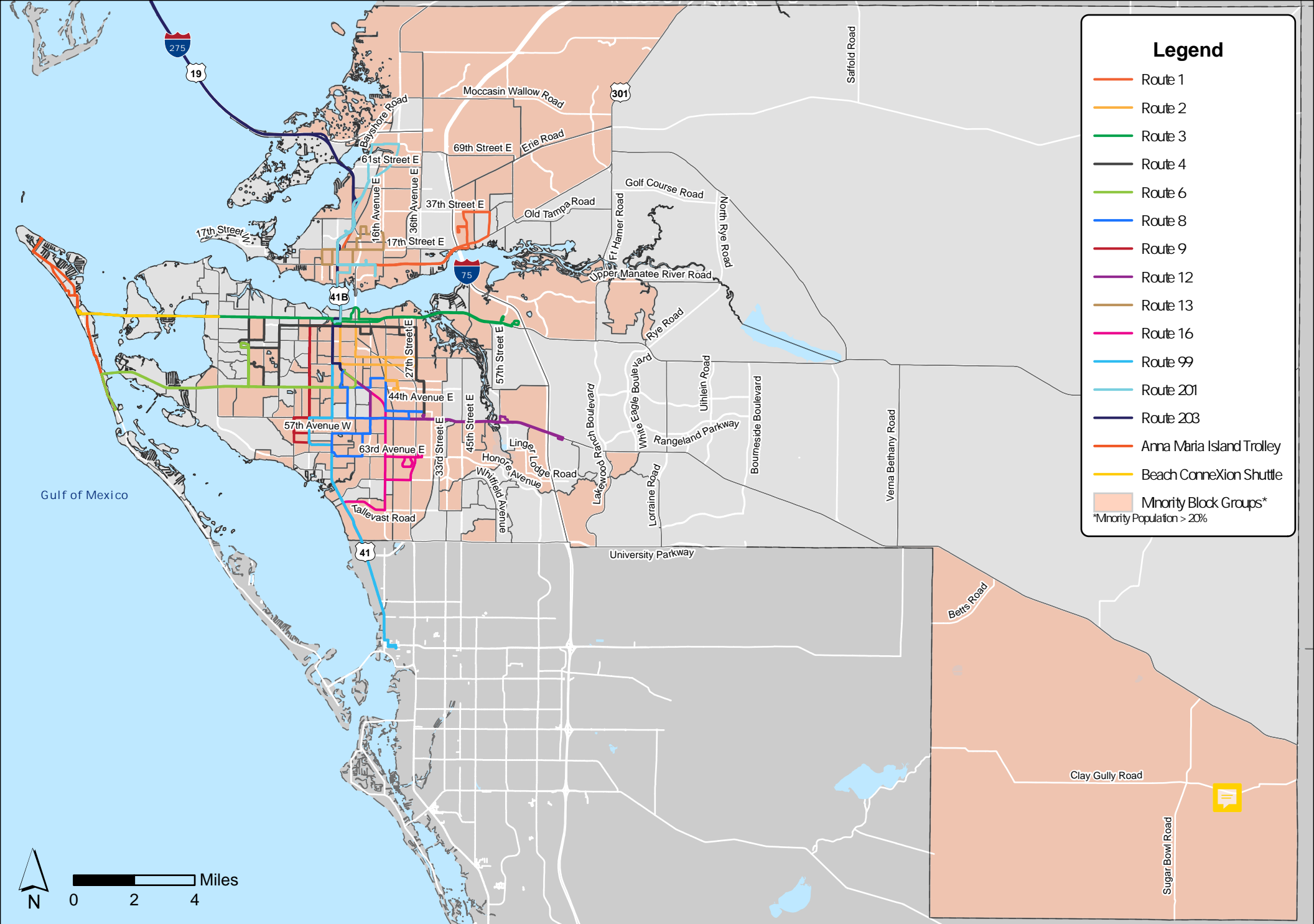
Sunset Date: February 28, 2025

Attachment A: Minority and Non-Minority Routes

Route	Name	Non Minority Non-Directional Distance (Miles)	Minority Non-Directional Distance (Miles)	Total Non-Directional Distance (Miles) (GIS)	Non Minority Distance Route Percentage	Minority Distance Route Percentage	Title VI Route Status ¹
Route 1	Ellenton Outlet Mall	4.78	9.09	13.87	34%	66%	Minority
Route 2	East Bradenton	0	11.04	11.04	0%	100%	Minority
Route 3	Manatee Avenue	8.49	9.94	18.43	46%	54%	Minority
Route 4	9th Avenue East and West	3.22	16.10	19.32	17%	83%	Minority
Route 5	Anna Maria Island Trolley	8.56	0.00	8.56	100%	0%	Non Minority
Route 6	Cortez Road	6.17	7.09	13.26	47%	53%	Minority
Route 8	Oneco-Bayshore	0.53	11.92	12.45	4%	96%	Minority
Route 9	9th Avenue W/26th Street	0	6.92	6.92	0%	100%	Minority
Route 12	State Road 70	1.43	8.06	9.49	15%	85%	Minority
Route 13	Palmetto	1.27	10.25	11.52	11%	89%	Minority
Route 16	15th Street East	1.75	11.17	12.92	14%	86%	Minority
Route 75	Beach ConneXion	4.7	0.00	4.70	100%	0%	Non Minority
Route 99*	Bradenton-Sarasota	0.19	10.24	10.43	2%	98%	Minority
Route 201	North County ConneXion	4.76	8.68	13.44	35%	65%	Minority
Route 203*	Skyway ConneXion	5.14	12.57	17.71	29%	71%	Minority

¹A route having more than 50 percent of its one-way mileage within or adjacent to minority Census Block Groups

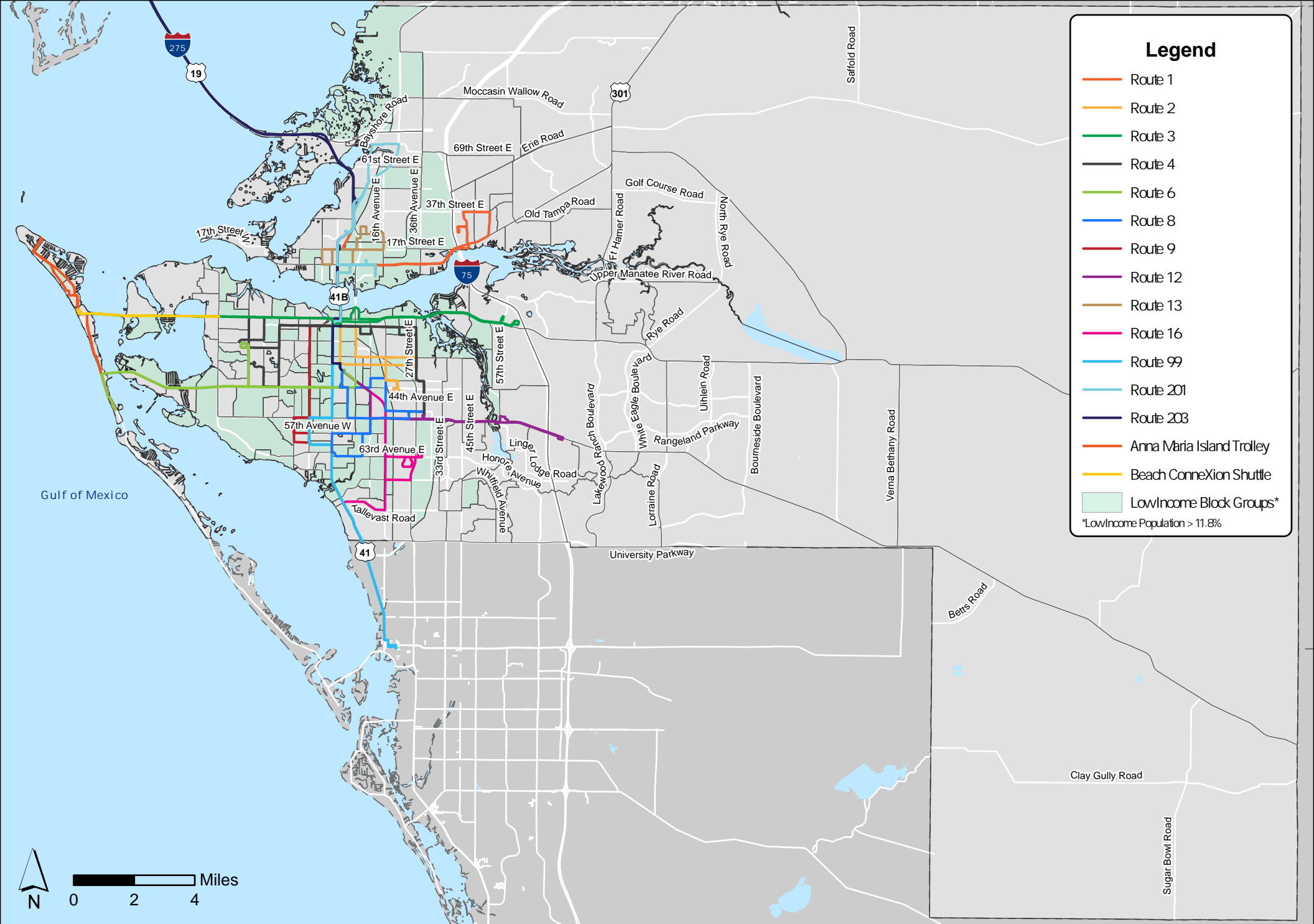
*Based on the route portion located in Manatee County



MCAT Title VI Analysis - Mnrity Block Groups



Data Source: American Community Survey, 2015 - 2019 5 Year Estimates



MCAT Title VI Analysis - Low Income Block Groups

