

RESOLUTION R-25-075

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS, MANATEE COUNTY, FLORIDA, AUTHORIZING THE SUBMISSION OF THE APPROVED 2025 PUBLIC WORKS/TRANSIT DIVISION TITLE VI PROGRAM UPDATE AND SUPPORTING DOCUMENTS TO THE FEDERAL TRANSIT ADMINISTRATION

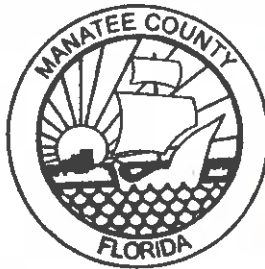
WHEREAS, the Federal Transit Administration requires that all direct and primary funding recipients to document their compliance with Title VI requirements by submitting a Title VI Program Update once every three (3) years; and

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 2025 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 2025 Title VI Program update to FTA.
3. The BOARD hereby authorizes the Transit Division Manager to electronically submit the 2025 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 2025 Title VI Program Update.

PASSED AND DULY ADOPTED with a quorum present and voting this the 6th day of May 2025.



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

By: _____

George Kruse
George Kruse, Chairperson

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

By: _____

Robin Poth, DC



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

May 6, 2025

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 2025 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-25-075, which authorizes the submittal of the 2025 Title VI Program update and was approved by the Manatee County Board of County Commissioners (BOCC) on May 6, 2025.

Sincerely,

Chad Butzow,
Public Works Director
Manatee County Government

Attachment: 2025 Title VI Program Update

Cc: Kevin Hoyt, Manatee County Public Works/Transit Division Manager
Chris DeAnnuntis, Manatee County Public Works/Transit Planning Manager

CAROL ANN
FELTS
District 1

AMANDA
BALLARD
District 2

TAL
SIDDIQUE
District 3

MIKE
RAHN
District 4

DR. BOB
MCCANN
District 5

JASON
BEARDEN
At Large

GEORGE W.
KRUSE
At Large

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

TITLE VI Program Update

April 2025



Kimley»Horn
Expect More. Experience Better.

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Introduction

The Manatee County Government (MCG) 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 Title VI Program Update documents the level and quality of transit service provided to minority and low-income areas in Manatee County, 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 Program to FTA in March 2022.

The purpose of this Title VI Program is to ensure 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 MCG 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 MCG Public Works/Transit Division provides transit services with a firm policy of nondiscrimination. Manatee County Government, through the MCG 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).



MCG's Transit Planning Manager is responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services, and program information dissemination and administration. Additionally, the Transit Division Manager is responsible for implementing all aspects of the public transit Title VI Program for MCG. 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 MCG Public Works/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

A handwritten signature in black ink that reads "Kevin Hoyt".

Kevin Hoyt, Transit Division Manager

04/16/2025

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
Language Assistance Plan	Section 1.6
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 2022 Title VI Program Update.

Checklist for Service Standards and Service Policies

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

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 Department of Transportation (DOT) Limited English Proficiency (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 FTA's 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 MCG 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 may file a complaint with the FTA's Office of Civil Rights. Person(s) can also file a complaint directly with the MCG Public Works/Transit Division using the form and procedure available on the Transit Division website in English and Spanish. The MCG Public Works/Transit Division Title VI Complaint Form and Title VI Complaint Procedure were updated in Spring 2025 to include a Spanish language version. Both Title VI Complaint forms are in **Appendix C** of this report and are posted on the MCG Public Works/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 was completed in 2022.

1-4. Promoting Inclusive Public Participation

The content and considerations of Title VI, the Executive Order on LEP, 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 MCG 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
- Ongoing Transit Division plans and initiatives
- Instructional videos and informational brochures

Comparable information is posted on Transit Division buses and at Manatee County Area Transit (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**)
- Port Manatee ConneXion Service Details
- MCAT Service Details
- Published bus route brochures
- ADA complaint procedures
- MyStop notice in English and Spanish in monthly County e-newsletter

Figure 1: Real time ticket information in Spanish



As part of both the Transit Division's 2018 and 2023 Transit Development Plan (TDP) Major Update public participation processes, on-board surveys —available in both English and Spanish — provided an important opportunity to gain valuable feedback on how the Transit Division can best serve the community and the surrounding region.

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 Language Assistance 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, and the Public Participation Plan**. 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. Furthermore, 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 LEP persons in Manatee County, the MCG Public Works/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, MCG Public Works/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 2023 American Community Survey (ACS), Manatee County has a total population of 416,020, of which 397,804 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 370,122 (93.0 percent) of persons over the age of five speak English “very well” while 27,682, or 7 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.”

Furthermore, proficiency in a second language continues to be a highly valued skill, and employees who are multilingual are encouraged to use their language abilities to support our residents. Doing so aligns with the County's A.C.E. (i.e., Accountability, Civility, Ethics) motto and reinforces the shared commitment to **Work That Matters**. It is essential to recognize that assisting residents in their preferred language is part of the County's dedication to exceptional service.

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

Language Spoken	Estimated Population*	Percent of Speakers per total County Population	Estimated Population Speaking English Less Than "Very Well"	Percent of Estimated Population Speaking English Less Than "Very Well"
English	322,417	81.04%	N/A	N/A
Spanish	52,163	13.11%	20,284	38.9%
Other Indo-European Languages	15,501	3.89%	4,280	27.6%
Asian and Pacific Island languages	5,737	1.44%	2,519	43.9%
Other Languages	1,986	0.49%	599	30.2%
Total	397,804	100%	27,682	7.0%

*Reflects the estimated number of persons over the age of five who speak each corresponding language.
Source: 5-Year American Community Survey (ACS) Estimates (2019-2023)

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.

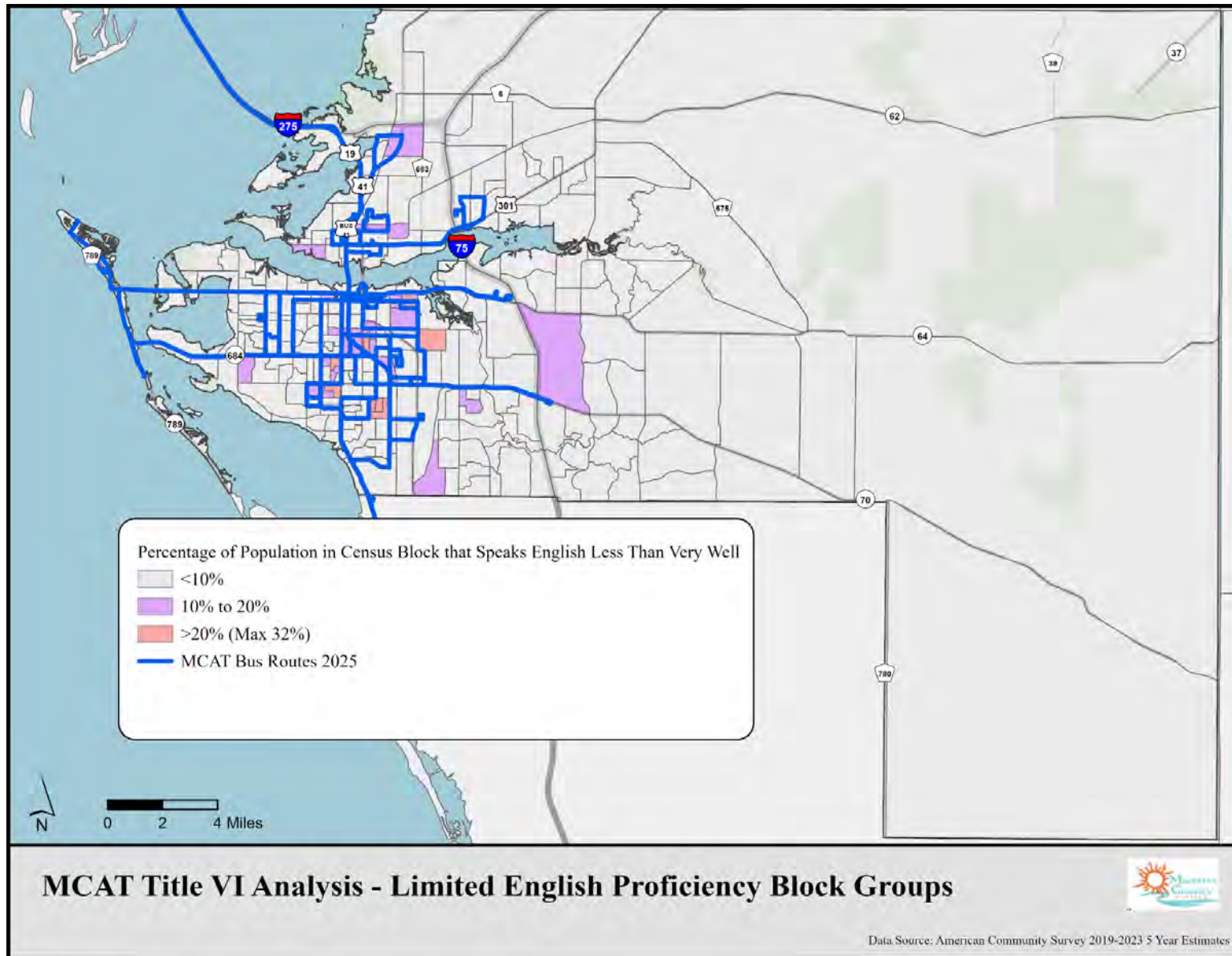
As a result of the analysis, the MCG Public Works/Transit Division will continue to target Spanish speakers as the predominant LEP population for assistance, and the agency will work to implement language assistance measures that meet the needs of Spanish-speaking persons in the community. No language other than Spanish is estimated to be higher than 5 percent of the population. Over time, MCG 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.

Based on comments from bus operators, fixed route services are being utilized by more and more Haitian Creole speaking persons. As requested by bus operators, some of the audio announcements related to passenger safety and behavior have been translated into Haitian Creole. These in-vehicle announcements are set to occur regularly. The same in-vehicle announcements also play in Spanish automatically. The MCG Public Works/Transit Division is considering translating some of the visual announcements into Haitian Creole in the future.

Though not required, the MCG Public Works/Transit Division makes every effort to improve access to its program for all LEP persons.

Figure 2 shows the distribution of the LEP population based on the ACS data analysis. As shown below, the highest concentrations of LEP populations can be found in the urbanized area of the county.

Figure 2: Limited English Proficiency Map



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

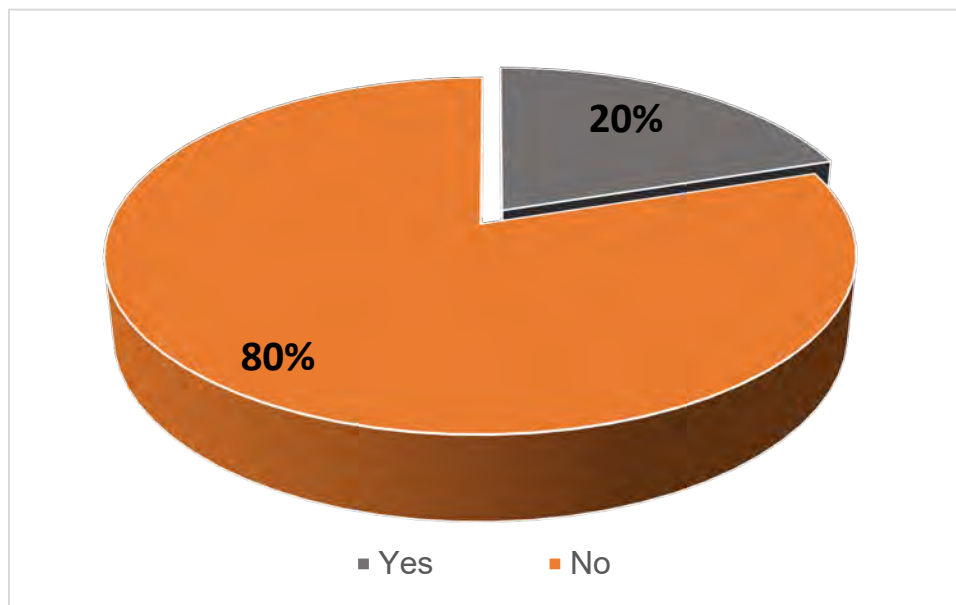
Both the 2018 and 2023 TDP updates included on-board survey questions that assisted in gathering data on race and language information, aiming to understand the LEP population served by MCAT.

Both on-board surveys were distributed in English and Spanish and included LEP-related questions. The results of the 2018 survey 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 3** shows that 20 percent (approximately 170 of the 849 riders surveyed) of the onboard survey respondents spoke a language other than English at home. Of the 170 respondents, 104 indicated that they speak Spanish at home. Spanish was the most common language indicated by respondents who spoke a language other than English at home.

Figure 3: 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 Public Works/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, public outreach efforts completed by MCG Public Works/Transit Division staff reinforce the importance of public transportation services for LEP persons for purposes of employment and access to educational opportunities.

The MCG Public Works/Transit Division employs bilingual staff (i.e., staff that are fluent in both English, Spanish, and Creole), 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 MCG 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 2023 10-Year TDP Update. Bilingual staff consist of bilingual bus operators, operations supervisors, and customer service staff.

Currently, the MCG Public Works/Transit Division has a communications team under contract that supports translation services for a variety of media and outreach material. This is consistent with efforts to transition various outreach materials into Spanish language.

Based on available financial and staff resources available, the MCG Public Works/Transit Division is currently delivering competent and accurate language services for LEP populations within the service area. MCG 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 MCG 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.

Furthermore, proficiency in a second language continues to be a highly valued skill, and employees who are multilingual are encouraged to use their language abilities to support our residents. Doing so aligns with the County's A.C.E. (i.e., Accountability, Civility, Ethics) motto and reinforces the shared commitment to **Work That Matters**. It is essential to recognize that assisting residents in their preferred language is part of the County's dedication to exceptional service.

1-6. Developing a Language Assistance Plan (LAP)

After completing the Four Factor Analysis, the Language Assistance Plan (LAP) addresses the results and provides further direction on how to best reach LEP persons in the community and facilitate access to MCG Public Works/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 webpage and website information for Spanish language translations.
- Continue to identify and hire Spanish and Haitian Creole-speaking bus operators, operations supervisors, and customer service staff.
- Prepare Spanish language bus service announcements for communication via the onboard announcement and infotainment systems.
- Provide in-vehicle announcements in Haitian Creole, including videos shown on the onboard infotainment system that have voiceovers and subtitles.
- Translate key program information material, such TD and ADA program information; into Spanish language versions.
- Post signs to communicate language services available, including Lionbridge translation services, 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. Lionbridge is an advanced over-the-phone system that provides instant access to professional interpreters fluent in more than 380 languages.
- Indicate the availability of language translation services within outreach documents, including brochures, booklets, etc.
- Publish public notices and other information in English and Spanish.
- 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.

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 and route schedules 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. In addition, several transit operators speak Haitian Creole and assist Creole-speaking customers 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 both 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. In addition, the MCG Public Works/Transit Division Title VI notice is posted in Spanish on the website and on buses.
- **Community Outreach** - The MCG Public Works/Transit Division includes staff and consultants who serve as translators for community outreach meetings.
- **Real-Time Passenger Information** - Promotional "How to" business cards are available in both English and Spanish.

Describe how the recipient monitors, evaluates, and updates the LAP

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's LAP to be 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.

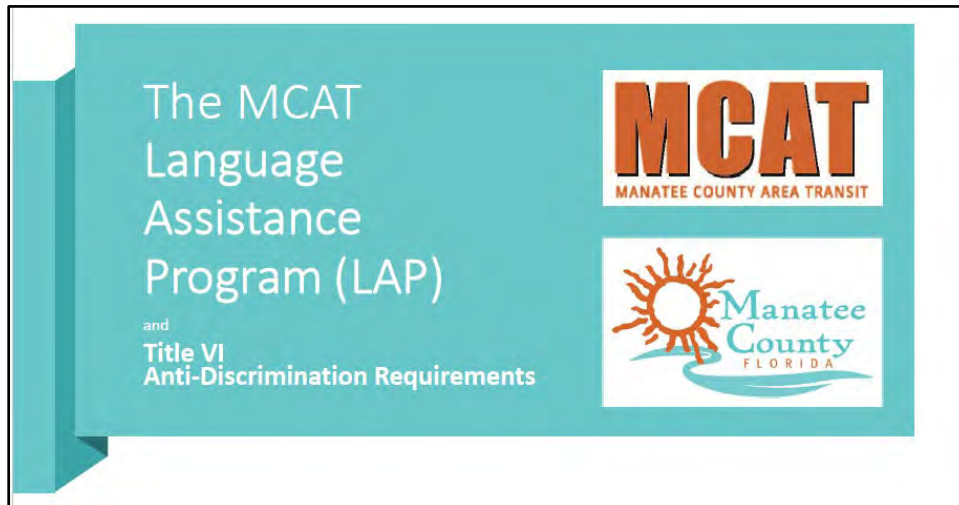
- Monitor the frequency of encounters with LEP language groups, as part of community outreach.
- Include LEP related question(s) in each on-board survey of bus passengers in order to estimate how many bus riders need language assistance and in what languages.
- Assess the availability of resources, including 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 MCG Public Works/Transit Division will conduct the following activities:

- Provide information on LEP “best practices” and the LAP as part of regular staff meetings and staff refresher training courses.
- LAP content is delivered as part of New Operator training, introduction presentation slide shown in **Figure 4**.
- 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.
- Use multiple staff to ensure and enhance the competency of interpreters and translation services provided by the MCG Public Works/Transit Division team.
- Communicate the goals and objectives of the LAP to MCAT staff and provide the opportunity for participation in development and implementation of LAP elements.
- Encourage access and familiarity with Lionbridge Interpretation Services via the County’s on-line training courses. A specific course is available to orient staff regarding Lionbridge services.

Figure 4: New Operator LEP Training



1-7. 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."

No major facilities have been planned or constructed since the 2022 Title VI program update, in accordance with Title 49 CFR Section 21.9(b)(3), no additional analysis pertaining to facilities is required.

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 MCG 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 MCG Public Works/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 “plug” vehicles are deployed 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). 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, Monday through Friday, with support provided through a Florida Department of Transportation (FDOT) Service Development grant.
- Routes 3 and 304 operate on a 30-minute service frequency, all day, Monday through Saturday.
- Route 99, jointly operated with Sarasota County, was recently improved to a 20-minute frequency from 5:15 a.m. to 9:30 p.m.
- Routes 13 and 201 operate on a 120-minute service frequency.

Appendix F provides specific details 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 MCG Public Works/Transit Division Planning staff evaluate schedule adherence and strive to improve performance, as necessary. If a bus departs more than one minute ahead of schedule, it is classified as “early” and if it departs more than five minutes behind schedule, it is classified as “late.” Buses departing in between those two service parameters are considered “on-time.” In September 2015, the MCG Public Works/Transit Division achieved full fleet coverage with deployment of APCs. The APC system enables staff to monitor on-time performance on a continuous basis. With APC monitoring in place, the MCG Public Works/Transit Division utilizes the following performance standard: All routes shall perform at better than 60 percent on-time performance with exceptions made during the peak season (February to April); and typically, “plug” vehicles are deployed 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 MCG Public Works/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 since 2014. As part of a re-branding process approval in 2013, the MCG Public Works/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 procedures.

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. These policies and procedures are listed in **Appendix E**.

For the 2025 Title VI Program Update, the MCG Public Works/Transit Division performed a vehicle assignment evaluation for calendar years 2023 and 2024. The results of that evaluation are included in **Appendix E**. Since 2024, MCAT fixed route service maintains a consistent fleet of vehicles that are 35' long with passenger seating availability consistent across all vehicles.

DEMOGRAPHIC AND SERVICE PROFILE

As part of the Title VI Program Update, the MCG Public Works/Transit Division developed a demographic and service profile. This profile includes evaluating the location of minority and low-income populations in Manatee County and designating minority routes. This evaluation resulted in demographic profile maps depicting the location of Title VI populations in Manatee County. Preparation of the demographic profile maps is not a requirement for small transit agencies. However, the MCG Public Works/Transit Division chooses to prepare these analyses to better serve disadvantaged populations throughout the community.

In those profile maps, 2023 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 are color-coded within the map series. **Figure 5** illustrates census block groups in Manatee County that have a higher proportion of minority populations compared to the county average. **Figure 6** displays census block groups in Manatee County with a greater proportion of low-income populations than the county average.

Specific thresholds for each population group, related to the countywide proportions, are as follows:

- **Minority Block Group** – A block group where more than 31 percent of the population is identified as a minority.
- **Low-Income Block Group** – A block group where more than 8.5 percent of the population is identified as living in poverty.

MCAT's existing fixed bus routes were also evaluated 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 determines its minority or non-minority classification. The results of that GIS evaluation are included in **Table 2**, and individual routes are classified as minority or non-minority.

Figure 5: Minority Population Map

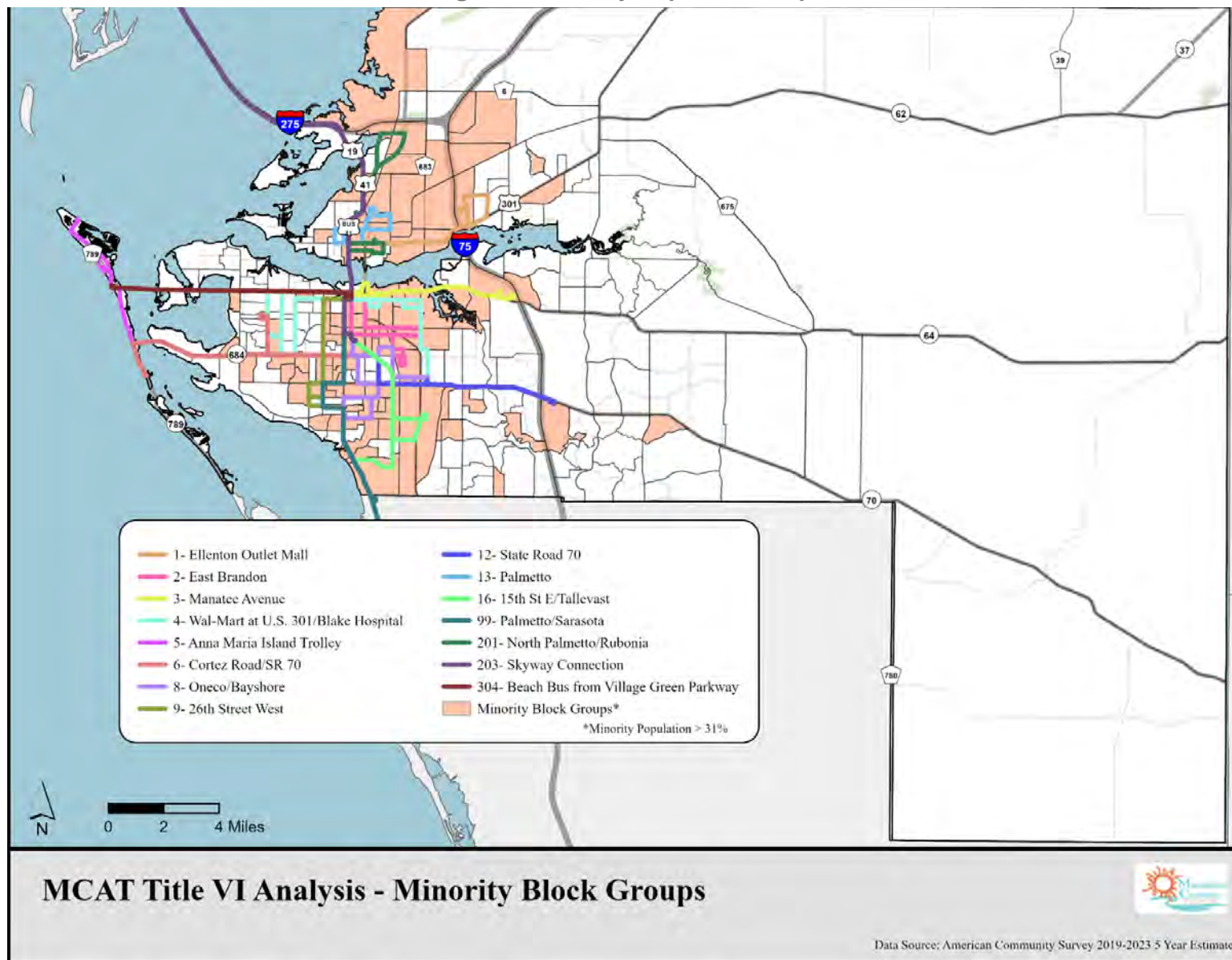


Figure 6: Low Income Population Map

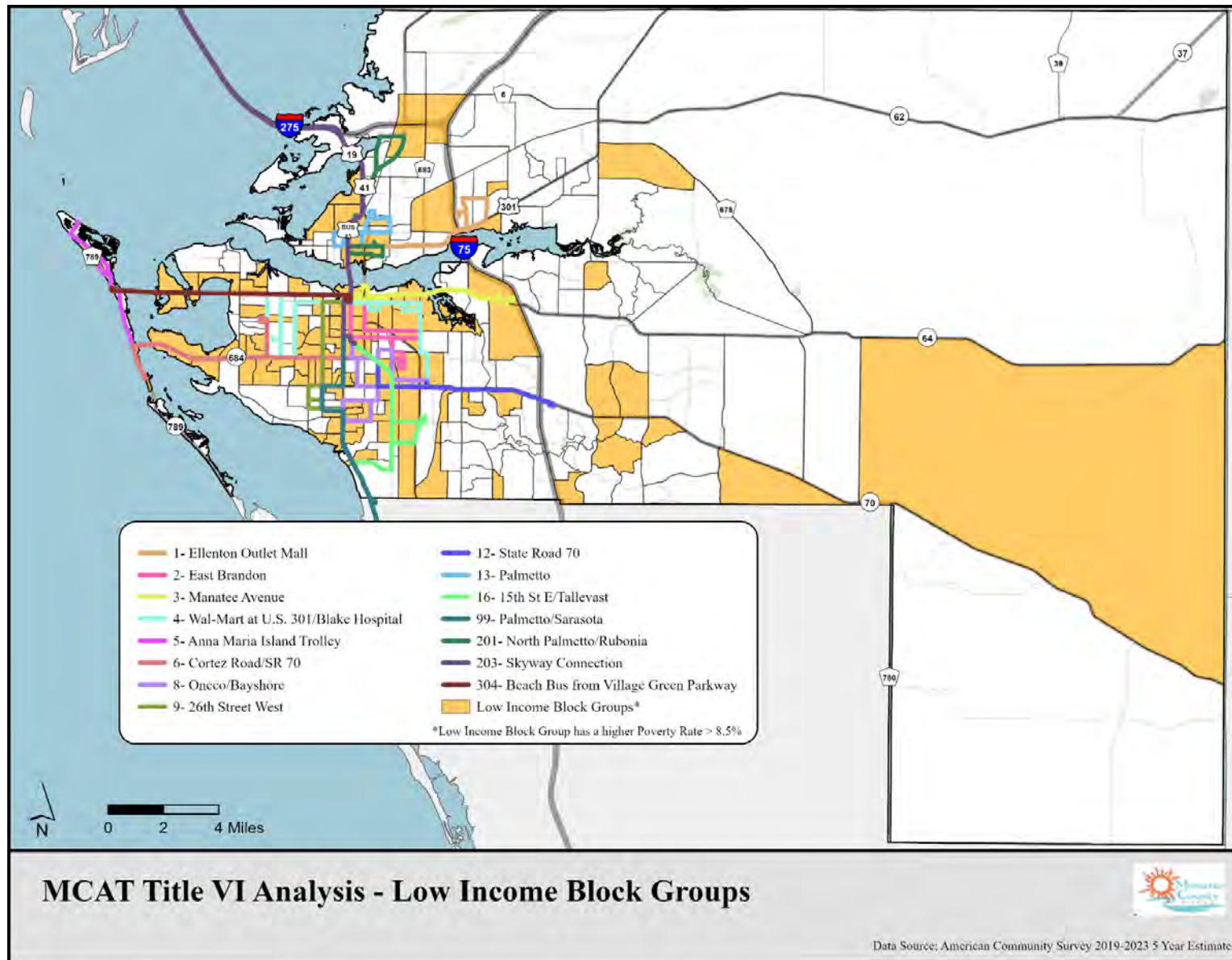


Table 2: Minority and Non-Minority Routes

Route	Name	Non Minority Non Directional Distance (Miles)	Minority Non- Directional Distance (Miles)	Total Non- Directional Distance (Miles)	Non Minority Distance Route Percentage	Minority Distance Route Percentage	Title VI Route Status ¹
Route 1	Ellenton Outlet Mall	5.17	8.7	13.87	37.27%	62.73%	Minority
Route 2	East Bradenton	0.64	10.4	11.04	5.80%	94.20%	Minority
Route 3	Manatee Avenue	2.91	6.75	9.66	30.12%	69.88%	Minority
Route 304	Manatee Avenue Beach	7.89	1.52	9.41	83.85%	16.15%	Non Minority
Route 4	9th Ave East and West	8.85	10.47	19.32	45.81%	54.19%	Minority
Route 5	Anna Maria Island Trolley	8.56	0	8.56	100.00%	0.00%	Non Minority
Route 6	Cortez Road	6.02	7.24	13.26	45.40%	54.60%	Minority
Route 8	Oneco-Bayshore	2.61	9.84	12.45	20.96%	79.04%	Minority
Route 9	9th Avenue W/26th Street	1.83	5.09	6.92	26.45%	73.55%	Minority
Route 12	State Road 70	4.67	4.82	9.49	49.21%	50.79%	Minority
Route 13	Palmetto	3.1	8.42	11.52	26.91%	73.09%	Minority
Route 16	15th Street East	1.68	8.66	10.34	16.25%	83.75%	Minority
Route 99*	Bradenton-Sarasota	1.59	8.84	10.43	15.24%	84.76%	Minority
Route 201	North County Connection	4.61	8.83	13.44	34.30%	65.70%	Minority
Route 203*	Skyway Connection	8.55	9.16	17.71	48.28%	51.72%	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

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 mcats@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	05/01/2025

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:

Chris DeAnnuntis, Transit Section Planning Manager, Public Works/Transit Division

AUTHORIZATION

Kevin Hoyt, Transit Division Manager 

RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: May 1, 2025

Sunset Date: April 30, 2028

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	05/01/2025

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 is mixed use and includes 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:

Chris DeAnnuntis, Transit Section Planning Manager, Public Works/Transit Division

AUTHORIZATION

Kevin Hoyt, Transit Division Manager *Kevin Hoyt*

RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: May 1, 2025

Sunset Date: April 30, 2028

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:
05/01/2025

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	3	2	20	1.25	25
30' Phantom	3	2	23	1.25	29
>30' Hybrid Low Floor	5	2	31	1.25	39
35' Low Floor	23	2	26	1.25	33
35" Trolley	5	2	26	1.25	33

The Fleet Division maintains a bus inventory that 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:

Chris DeAnnuntis, Planning Manager, Public Works/Transit Division

AUTHORIZATION:

Kevin Hoyt, Transit Division Manager 

RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: May 1, 2025

Sunset Date: April 30, 2028

Vehicle Assignment Evaluation

For the 2025 Title VI Program Update, the MCG Public Works/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 MCG Public Works/Transit Division consists of an evaluation of the average age of revenue service vehicles assigned to each fixed bus route for calendar years 2023 and 2024. 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 the entire MCAT fleet was 6.8 years in FY 24.
- The average age of all revenue vehicles assigned to each fixed bus route is shown for each one-year period.
- A two-year average age is calculated for each bus route.
- An overall system-wide two-year average age is also calculated.
- An above average (>150%) threshold is established to identify potential disparate impacts.
- The minority status of each bus route is denoted.

When combined with the two-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 the above average threshold, several routes were identified which required further evaluation. The following conclusions can be drawn based on an understanding of the operation of each of these services.

- **Palmetto (Routes 1, 13, and 201)** – In the past, MCG Public Works/Transit Division operations staff regularly assigned smaller vehicles (i.e., 29-foot and 30-foot heavy-duty transit vehicles) to the Palmetto services to facilitate safer movement through neighborhood streets. In 2015, the Transit Division shifted to a policy of purchasing only 35' buses for fixed-route operations. The result was that the smaller vehicles, which were 2009 and 2011 models, were assigned more often to the Palmetto services. The analysis reflects older and smaller fleet vehicles assigned in FY 2023. As of FY 2024, those older, smaller vehicles are out of service and no vehicles smaller than 35 feet were assigned to Palmetto services in FY 2024. Moving forward, vehicle assignment for Palmetto service will consist of a mix of vehicles that are all uniform in size and, consequently, of varying age.
- **Route 2** – Similar to the Palmetto routes, operations on Route 2 were regularly assigned smaller and older vehicles (i.e., 29-foot and 30-foot heavy-duty transit vehicles) in 2023 in order to more easily navigate through neighborhood streets. However, the smaller and older fleet vehicles are now out of service and newer, 35' vehicles are now being assigned.



Vehicle Assignment Evaluation – Summary Analysis

Route Number	Route Name	Average Age (2023)	Average Age (2024)	Two-Year Age Average	Route Classification
1, 13, 201	Palmetto	8.7	7.2	7.9	Minority
2	East Bradenton	10.0	7.2	8.6	Minority
3	Manatee Ave	4.5	2.7	3.6	Minority
304,75	Manatee Avenue Beach Bus	5.7	4.5	5.1	Non Minority
4	9th Ave East and West	2.1	3.3	2.7	Minority
5	Anna Maria Island Trolley	3.6	4.5	4.1	Non Minority
6	Cortez Road	3.8	2.3	3.1	Minority
8	Oneco-Bayshore	2.9	2.1	2.5	Minority
9	9th Avenue W/26th Street	3.2	4.2	3.7	Minority
12	State Road 70	6.5	7.9	7.2	Minority
16	15th Street East	7.4	7.2	7.3	Minority
99	Bradenton-Sarasota	4.0	3.2	3.6	Minority
203	Skyway Connexion	6.3	6.2	6.2	Minority
System-Wide Two-Year Average				5.0	
150% of the System-Wide Average				7.6	

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	05/01/2025

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 monthly 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.

ORIGINATOR, TITLE, AND DEPARTMENT NAME:

Chris DeAnnuntis, Transit Section Planning Manager, Public Works/Transit Division

AUTHORIZATION

Kevin Hoyt, Transit Division Manager *Kevin Hoyt*

RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: May 1, 2025

Sunset Date: April 30, 2028

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 #	Title:	Date Issued:
14-0800	Transit Passenger Amenities	2/1/2025

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 8 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. "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:

Steve Roberts, Logistics Manager, Public Works Department

AUTHORIZATION:

Kevin Hoyt, Transit Division Manager *Kevin Hoyt*

HISTORY:

N/A

FORMS:

N/A

RELATED POLICY:

N/A

DATE ISSUED/SUNSET DATE:

Issue Date: February 1, 2025

Sunset Date: January 1, 2028



Approved in Open Session 5/6/25
Manatee County
Board of County Commissioners

May 6, 2025 - Regular Meeting

Subject

Adoption of Resolution R-25-075, approving and authorizing submittal of the Title VI Program Update to the Federal Transit Administration (FTA)

Category

CONSENT AGENDA

Briefings

None

Contact and/or Presenter Information

Christopher DeAnnuntis, Transit Planning Manager, chris.deannuntis@mymanatee.org, (941) 747-8621 x7622

Kevin Hoyt, Transit Division Manager, kevin.hoyt@mymanatee.org, (941) 747-8621 x7440

Action Requested

- Adoption of Resolution R-25-075;
- Approval to submit the Title VI Program Update to the Federal Transit Administration (FTA);
- Authorization for the Public Works Director or designee to sign the Title VI Program Update Transmittal Letter; and
- Authorization for the Transit Division Manager to electronically submit the 2025 Title VI Program Update to FTA and sign all supporting required documentation.

Enabling/Regulating Authority

Title VI of the Civil Rights Act of 1964

Applicable Advisory Board

N/A

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 Plan 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 March 8, 2022, by the Manatee County Board of County Commissioners as a consent agenda item. The attached 2025 Title VI Program Update fulfills the FTA requirements outlined in Circular 4702.1B.

Attorney Review

Not reviewed (no apparent legal issue).

Instructions to Board Records

Please forward the signed Resolution to Kevin Hoyt, Transit Division Manager, kevin.hoyt@mymanatee.org, (941) 747-8621 x 7438.

Cost and Funds Source Account Number and Name

No Cost

Amount and Frequency of Recurring Costs

N/A

Note: The Attachment referenced in the transmittal letter - Title VI Program Update April 2025 (65pgs), was not published on E-Agenda, nor provided in hard copy to the Clerk for the record, to make the Letter complete.

Per telephone conversation, Maria Lema, Administrative Project Coordinator, and email communication with Chris Deannuntis, Transit Division Manager, this agenda packet is distributed with notation that the Attachment was not published. This is being done to keep an accurate trail of this agenda packet for the record.



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

May 6, 2025

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 2025 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-25-075, which authorizes the submittal of the 2025 Title VI Program update and was approved by the Manatee County Board of County Commissioners (BOCC) on May 6, 2025.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chad Butzow", with a long horizontal flourish extending to the right.

Chad Butzow,
Public Works Director
Manatee County Government

Attachment: 2025 Title VI Program Update

Cc: Kevin Hoyt, Manatee County Public Works/Transit Division Manager
Chris DeAnnuntis, Manatee County Public Works/Transit Planning Manager

CAROL ANN
FELTS
District 1

AMANDA
BALLARD
District 2

TAL
SIDDIQUE
District 3

MIKE
RAHN
District 4

DR. BOB
MCCANN
District 5

JASON
BEARDEN
At Large

GEORGE W.
KRUSE
At Large

From: [Chris Deannuntis](#)
To: [Robin Toth](#); [Kevin Hoyt](#)
Subject: RE: BCC Mtg 5/6/25: Item 47, Resolution R-25-075, auth submittal of Title VI Program Update to FTA
Date: Monday, May 12, 2025 9:37:35 AM
Attachments: [image001.png](#)
[Manatee County 2025 Title VI Program.pdf](#)

[NOTICE: This message originated outside of Manatee County Clerk's Office -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Robin,
Sorry, I sent that from my phone. See attached. It was in my original email this morning.
Chris

From: Robin Toth <robin.toth@ManateeClerk.com>
Sent: Monday, May 12, 2025 9:23 AM
To: Chris Deannuntis <chris.deannuntis@mymanatee.org>; Kevin Hoyt <kevin.hoyt@mymanatee.org>
Subject: RE: BCC Mtg 5/6/25: Item 47, Resolution R-25-075, auth submittal of Title VI Program Update to FTA

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REPORT MESSAGE Button in Outlook if you feel this is a Phishing email.

Chris,

The attachment you just sent appears to be the Clerk of Circuit Court new Logo? I'm confused.

Thank you,

Robin Toth
Deputy Clerk, Board Records Department



For Angelina "Angel" Colonnese
Manatee Clerk of the Circuit Court & Comptroller
(941) 749-1800 Ext. 4179
1115 Manatee Ave W, Bradenton, FL 34205
www.ManateeClerk.com

To Protect the Public Trust through Integrity and Transparency

From: Chris Deannuntis <chris.deannuntis@mymanatee.org>
Sent: Monday, May 12, 2025 9:17 AM
To: Robin Toth <robin.toth@ManateeClerk.com>; Kevin Hoyt <kevin.hoyt@mymanatee.org>
Subject: Re: BCC Mtg 5/6/25: Item 47, Resolution R-25-075, auth submittal of Title VI Program Update to FTA

[NOTICE: This message originated outside of Manatee County Clerk's Office -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

The Title VI update is the pdf attached to this email.

Get [Outlook for iOS](#)

From: Robin Toth <robin.toth@ManateeClerk.com>
Sent: Monday, May 12, 2025 9:11:04 AM

To: Chris Deannuntis <chris.deannuntis@mymanatee.org>

Subject: RE: BCC Mtg 5/6/25: Item 47, Resolution R-25-075, auth submittal of Title VI Program Update to FTA

CAUTION: This email originated from an external source.

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Good Morning Chris,

Agenda Item 47, Adoption of Resolution R-25-075, approves and authorizes submission of the 2025 Title VI Program update and supporting documents to the Federal Transit Administration. The transmittal letter references an Attachment: 2025 Title VI Program Update, which was not attached to the hard-copy letter to be executed by Chairman Kruse, or published with the E-agenda. Where is this 2025 Title VI Program Update, because the letter is incomplete without it.

Is 2:15pm a good time for you?

Thank you,

Robin Toth

Deputy Clerk, Board Records Department



For Angelina "Angel" Colonnese
Manatee Clerk of the Circuit Court & Comptroller
(941) 749-1800 Ext. 4179
1115 Manatee Ave W, Bradenton, FL 34205
www.ManateeClerk.com

To Protect the Public Trust through Integrity and Transparency

From: Chris Deannuntis <chris.deannuntis@mymanatee.org>

Sent: Monday, May 12, 2025 7:12 AM

To: Robin Toth <robin.toth@ManateeClerk.com>

Cc: Lori Stephens <lori.stephens@ManateeClerk.com>; Patricia Nolan <patricia.nolan@mymanatee.org>; Shannon Moore <shannon.moore@mymanatee.org>; Maria Lema <maria.lema@mymanatee.org>; Kevin Hoyt <kevin.hoyt@mymanatee.org>

Subject: RE: BCC Mtg 5/6/25: Item 47, Resolution R-25-075, auth submittal of Title VI Program Update to FTA

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Robin,

I have copied Maria on this email since she submitted the documents I have attached. The attached .pdf is the report you referenced in your email. I will ask that Maria make sure this was submitted with the attached write-up and resolution. I am not able to call you at 10am this morning since I have another meeting. Is there another time I can call you?

Thank you,
Chris

From: Kevin Hoyt <kevin.hoyt@mymanatee.org>

Sent: Monday, May 12, 2025 6:57 AM

To: Robin.Toth <Robin.Toth@manateeclerk.com>; Chris Deannuntis <chris.deannuntis@mymanatee.org>

Cc: Lori Stephens <lori.stephens@manateeclerk.com>; Patricia Nolan <patricia.nolan@mymanatee.org>; Shannon

Moore <shannon.moore@mymanatee.org>

Subject: RE: BCC Mtg 5/6/25: Item 47, Resolution R-25-075, auth submittal of Title VI Program Update to FTA

Chris – Can you touch base with Robin on the attached sometime today?

Kevin Hoyt

Transit Division Manager

Manatee County Area Transit

2411 Tallevast Road

Sarasota, FL 34243

(941) 747-8621 x7438

Kevin.hoyt@mymanatee.org

From: Robin Toth <robin.toth@ManateeClerk.com>

Sent: Friday, May 9, 2025 5:15 PM

To: Kevin Hoyt <kevin.hoyt@mymanatee.org>

Cc: Lori Stephens <lori.stephens@manateeclerk.com>; Patricia Nolan <patricia.nolan@mymanatee.org>; Shannon Moore <shannon.moore@mymanatee.org>

Subject: BCC Mtg 5/6/25: Item 47, Resolution R-25-075, auth submittal of Title VI Program Update to FTA

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Good Afternoon,

Hello Kevin,

The cover letter approved with this agenda item references an accompanying Title VI Program Update that was not published with the agenda item on E-Agenda as far as I can see as of this date.

I cannot sent this signed letter back to you until I receive the accompanying attachment to make this item complete; however, at the same atime, I cannot process the letter with an attachment that was not published(?)

Please call me Monday morning May 12, at 10:00 a.m., so we can talk about this.

Thank you,

Robin Toth

Deputy Clerk, Board Records Department



For Angelina "Angel" Colonnese
Manatee Clerk of the Circuit Court & Comptroller
(941) 749-1800 Ext. 4179
1115 Manatee Ave W, Bradenton, FL 34205
www.ManateeClerk.com

To Protect the Public Trust through Integrity and Transparency

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From: [Chris Deannuntis](#)
To: [Robin Toth](#)
Cc: [Kevin Hoyt](#); [Edrick Sweeting](#)
Subject: FW: Signed Transmittal Letter to FTA plusManatee County 2025 Title VI Program
Date: Monday, May 12, 2025 12:17:52 PM
Attachments: [image001.png](#)
[Signed Transmittal Letter to FTA plusManatee County 2025 Title VI Program .pdf](#)

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Robin,
I have attached the signed transmittal letter and the Title VI Program as one document. I believe this is all you need for your records since technically this was approved by the Board.
Chris

From: Maria Lema <maria.lema@mymanatee.org>
Sent: Monday, May 12, 2025 12:12 PM
To: Chris Deannuntis <chris.deannuntis@mymanatee.org>
Subject: Signed Transmittal Letter to FTA plusManatee County 2025 Title VI Program

Is this what you need? A copy of this attachment has been added to the file in the S drive.

Maria Lema
Administrative Project Coordinator
Public Works Department
Manatee County Area Transit Division
2411 Tallevast Road
Sarasota, FL 34243
Ph: (941) 708-7407
maria.lema@mymanatee.org



"It's A Great Day At Manatee County"

From: [Chris Deannuntis](#)
To: [Robin Toth](#)
Subject: RE: Signed Transmittal Letter to FTA plus Manatee County 2025 Title VI Program
Date: Monday, May 12, 2025 12:56:23 PM
Attachments: [image001.png](#)
[image002.png](#)

[NOTICE: This message originated outside of Manatee County Clerk's Office -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Robin,
Thank you for your attention to this matter.
Chris

From: Robin Toth <robin.toth@ManateeClerk.com>
Sent: Monday, May 12, 2025 12:47 PM
To: Chris Deannuntis <chris.deannuntis@mymanatee.org>
Subject: RE: Signed Transmittal Letter to FTA plus Manatee County 2025 Title VI Program

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Be suspicious of Attachments, Links and Request for Login Information and utilize the REPORT MESSAGE Button in Outlook if you feel this is a Phishing email.

Hi Chris,

I am distributing an email shortly, with notation about the Attachment to the transmittal letter. This is being done to keep an accurate trail of this agenda packet for the record.

Thank you,

Robin Toth
Deputy Clerk, Board Records Department



For Angelina "Angel" Colonnese
Manatee Clerk of the Circuit Court & Comptroller
(941) 749-1800 Ext. 4179
1115 Manatee Ave W, Bradenton, FL 34205
www.ManateeClerk.com

To Protect the Public Trust through Integrity and Transparency

From: Chris Deannuntis <chris.deannuntis@mymanatee.org>
Sent: Monday, May 12, 2025 12:42 PM
To: Robin Toth <robin.toth@ManateeClerk.com>
Subject: RE: Signed Transmittal Letter to FTA plus Manatee County 2025 Title VI Program

[NOTICE: This message originated outside of Manatee County Clerk's Office -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Robin,
I saw your email. The agenda coordinator believes what I sent you should suffice for your records.
Chris

From: Robin Toth <robin.toth@ManateeClerk.com>

Sent: Monday, May 12, 2025 12:19 PM

To: Chris Deannuntis <chris.deannuntis@mymanatee.org>

Subject: RE: Signed Transmittal Letter to FTA plus Manatee County 2025 Title VI Program

CAUTION: This email originated from an external source.
Be suspicious of Attachments, Links and Request for Login Information and utilize the REPORT MESSAGE Button in Outlook if you feel this is a Phishing email.

Hi Chris, Please see the email I just sent you regarding this Agenda Item 47.

Thank you,

Robin Toth

Deputy Clerk, Board Records Department



For Angelina "Angel" Colonnese
Manatee Clerk of the Circuit Court & Comptroller
(941) 749-1800 Ext. 4179
1115 Manatee Ave W, Bradenton, FL 34205
www.ManateeClerk.com

To Protect the Public Trust through Integrity and Transparency

From: Chris Deannuntis <chris.deannuntis@mymanatee.org>

Sent: Monday, May 12, 2025 12:17 PM

To: Robin Toth <robin.toth@ManateeClerk.com>

Cc: Kevin Hoyt <kevin.hoyt@mymanatee.org>; Edrick Sweeting <edrick.sweeting@mymanatee.org>

Subject: FW: Signed Transmittal Letter to FTA plus Manatee County 2025 Title VI Program

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Robin,

I have attached the signed transmittal letter and the Title VI Program as one document. I believe this is all you need for your records since technically this was approved by the Board.

Chris

From: Maria Lema <maria.lema@mymanatee.org>

Sent: Monday, May 12, 2025 12:12 PM

To: Chris Deannuntis <chris.deannuntis@mymanatee.org>

Subject: Signed Transmittal Letter to FTA plus Manatee County 2025 Title VI Program

Is this what you need? A copy of this attachment has been added to the file in the S drive.

Maria Lema

Administrative Project Coordinator

Public Works Department

Manatee County Area Transit Division

2411 Tallevast Road

Sarasota, FL 34243

Ph: (941) 708-7407

maria.lema@mymanatee.org



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