

Meeting Date
02/07/2017



AGENDA	
Section	CONSENT
Item No.	II.B.1

**AGENDA REPORT**  
**BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS**

SUBJECT:	Adoption RE: Federal Transit Administration's 2017 Title VI Report for Space Coast Area Transit
DEPT/OFFICE:	Community Services Group / Transit Services Department

**Requested Action:**

It is requested that the Board of County Commissioners adopt the 2017 Title VI Update Report for Space Coast Area Transit as required by the Federal Transit Administration.

**Summary Explanation & Background:**

Space Coast Area Transit, as the public transportation provider in Brevard County, is required to submit to the Federal Transit Administration (FTA) a Title VI update that documents the level and quality of transit service provided for minority and low-income areas, pursuant to Title VI of the Civil Rights Act of 1964, as amended. This report is submitted every three years and is intended to demonstrate compliance with Title VI requirements that preclude discrimination in the provision of transit service and transit-related amenities. The purpose of this plan is to assure that no persons, on the grounds of race, color, or national origin is excluded from participating in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance from FTA.

This update incorporates the Title VI requirements that were issued by the FTA in October 2012. The required elements are listed on pages 3 and 4 in the Title VI Plan. One of the requirements is that the Title VI Plan must be adopted by each Transit Agency's Board of Directors. Previously, before 2012, Space Coast Area Transit has been able to submit the plan updates administratively.

Once the Plan Update is certified by FTA, that certification will last 3 years; the current Title VI Plan certification expires on March 31, 2017.

**Fiscal Impact Analysis:** There is no fiscal impact in adopting the plan, but Title VI adopted plan is required to receive Federal Administrative grants.

**Contact Name:** Jim Liesenfelt, Transit Services Director  
**Phone:** 635-7815 ext. 601

**Clerk to the Board Instructions:**

**Exhibits Attached:** Space Coast Area Transit 2017 Title VI Update Report

<b>Contract /Agreement (If attached):</b> Reviewed by County Attorney	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	PR <input type="checkbox"/>
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County Manager Stockton Whitten	Deputy County Manager Assistant County Manager Venetta Valdengo	Department Director / Extension James P. Liesenfelt, Transit Services Director
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Tammy Rowe, Clerk to the Board, 400 South Street • P.O. Box 999, Titusville, Florida 32781-0999

Telephone: (321) 637-2001  
Fax: (321) 264-6972  
Tammy.Rowe@brevardclerk.us

February 8, 2017

MEMORANDUM

TO: Jim Liesenfelt, Transit Services Director

RE: Item II.B.1., Adoption of Federal Transit Administration's (FTA) 2017 Title VI Report for Space Coast Area Transit (SCAT)

The Board of County Commissioners, in regular session on February 7, 2017, adopted the 2017 Title VI Report for SCAT as required by the FTA approved the Fiscal Year 2017 Certifications and Assurances for FTA. Enclosed is a copy of the Report for your action.

Your continued cooperation is greatly appreciated.

Sincerely yours,

BOARD OF COUNTY COMMISSIONERS  
SCOTT ELLIS, CLERK

Tammy Rowe, Deputy Clerk

/ds

Encls. (1)

cc: Finance  
Budget



## 2017 TITLE VI UPDATE FINAL REPORT

FEBRUARY 2017



**Tindale-Oliver  
& Associates, Inc.**  
Planning and Engineering



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**FEDERAL TRANSIT ADMINISTRATION**

**TITLE VI UPDATE**

**SPACE COAST AREA TRANSIT**

**401 South Varr Avenue  
Cocoa, FL 32922  
(321) 635-7815  
[www.321Transit.com](http://www.321Transit.com)**

**Final Report**

**FEBRUARY 2017**

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## INTRODUCTION

Space Coast Area Transit, as the public transit provider in Brevard County, is required to submit to the Federal Transit Administration (FTA) a Title VI update that documents the level and quality of transit service provided for minority and low-income areas, pursuant to Title VI of the Civil Rights Act of 1964, as amended. This report is submitted every three years and is intended to demonstrate compliance with Title VI requirements that preclude discrimination in the provision of transit service and transit-related amenities. The purpose of this plan is to assure that no persons, on the grounds of race, color, or national origin, is excluded from participating in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance from FTA.

Although challenges have been encountered due to current economic conditions, funding constraints, and other externalities, Space Coast Area Transit's vision remains to maintain the current level of transit service in the county and expand service to better respond to the key emerging service market needs of students, commuters, and the tourism industry (including both workers and visitors) by developing new routes and/or service enhancements that target these unique markets and connect with transit providers in adjacent counties for improved regional accessibility.

## POLICY STATEMENT

As a major provider of public transportation whose employees have extensive daily contact with the public, Space Coast Area Transit recognizes its responsibility to the community it serves and is committed to a policy of nondiscrimination. Space Coast Area Transit works to ensure non-discriminatory transportation in support of its mission to provide accessible and affordable transportation options to Brevard County residents of all ages and abilities by maintaining the current level of transit service in the county and gradually enhancing existing fixed-route service to extend hours of operation and increase frequency in the most productive corridors.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that *"no person in the United States shall, on the ground 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).

The Environmental Justice component of Title VI guarantees fair treatment for all people and requires Space Coast Area Transit to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to the programs, services, and information Space Coast Area Transit provides. Environmental Justice regulations require Space Coast Area Transit:

- a) To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- b) To ensure the full and fair participation by all potentially affected communities in transportation decision-making process.
- c) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Space Coast Area Transit's Civil Rights Officer is responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services and programs. In addition, the Civil Rights Officer is responsible for implementing all aspects of the Title VI Program. However, along with the Transit Director, all managers, supervisors, and their staff share in the responsibility for making Space Coast Area Transit's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by Space Coast Area Transit in its financial assistance agreements with the U.S. Department of Transportation (DOT).

**TITLE VI PROGRAM CHECKLIST**

The following checklists address Title VI reporting requirements as described in FTA Circular 4702.1B. The first checklist applies to all recipients of Federal funding assistance, while the second checklist refers to all fixed-route transit providers. Since Space Coast Area Transit operates 29 fixed-route vehicles in peak service, the agency is not required to submit documentation for the third checklist that applies to transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people. To assist reviewers, page number references are provided for each requirement.

***Checklist for all Recipients:*****1. Title VI Notice to the Public**

Requirement: Submit a copy of the Title VI Notice to the Public, including a list of locations where the notice is posted.

Title VI Plan: ✓ page 5

**2. Title VI Complaint Procedure**

Requirement: Submit a copy of Space Coast Area Transit procedures for filing a Title VI complaint.

Title VI Plan: ✓ page 6-7

**3. Title VI Complaint Form**

Requirement: Submit a copy of the Space Coast Area Transit form for filing a Title VI complaint.

Title VI Plan: ✓ page 7-9

**4. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits**

Requirement: Submit a list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submittal.

Title VI Plan: ✓ page 9-10

**5. Public Participation Plan**

Requirement: Submit information about outreach methods to engage minority and Limited English Proficient (LEP) populations and a summary of outreach efforts made since the time of the last submittal.

Title VI Plan: ✓ page 10-12

**6. Language Assistance Plan**

Requirement: Submit a copy of the agency's plan for providing language assistance to LEP persons, which is based on the Department of Transportation (DOT) LEP guidance.

Title VI Plan: ✓ page 12-20

**7. Minority Representation on Non-Elected Committees and Councils**

Requirement: Submit a table depicting the membership of non-elected committees and councils broken down by race and a description of the process the agency uses to encourage the participation of minorities on such committees.

Title VI Plan: ✓ page 21

**8. Subrecipient Compliance with Title VI**

Requirement: Submit a description of how the agency monitors its subrecipients for compliance with Title VI and a schedule of subrecipient Title VI program submissions.

Title VI Plan: ✓ page 21-22

**9. Title VI Equity Analysis**

Requirement: Submit a Title VI Equity Analysis if the recipient has constructed a facility (vehicle storage facility, maintenance facility, operation center, etc.) since the time of the last submittal.

Title VI Plan: ✓ page 22

**10. Board Approval of Title VI Documentation**

Requirement: Submit a copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or officials responsible for policy decisions reviewed and approved the Title VI Program.

Title VI Plan: ✓ page 22

***Checklist for All Fixed-Route Transit Providers:*****1. Service Standards**

Requirement: Submit the agency's system-wide service standards for vehicle load, vehicle headway, on-time performance, and service availability.

Title VI Plan: ✓ page 24-27

**2. Service Policies**

Requirement: Submit the agency's system-wide policies for transit amenities and vehicle assignment.

Title VI Plan: ✓ page 28-29

## 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

*A Title VI Notice to the Public must be displayed to inform a recipient's customers of their rights under Title VI. At a minimum, recipients must post the notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc.*

The following Title VI Notice to the Public is posted in Space Coast Area Transit lobbies at the Cocoa Transit Terminal and Melbourne Transit Terminal and on the agency's website, [www.ridescat.com](http://www.ridescat.com).

#### Notifying the Public Rights Under Title VI

### **BREVARD COUNTY**

- The County of Brevard operates its Transit Services 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 Brevard County Transit Services.
- For more information on Brevard County Transit Services' civil rights program, and the procedures to file a complaint, contact (321) 635-7815, (TTY 321-633-1886); e-mail [Colby.Stallings@brevardfl.gov](mailto:Colby.Stallings@brevardfl.gov); or visit our administrative office at 401 South Varr Avenue, Cocoa, FL 32922. For more information, visit [www.321Transit.com](http://www.321Transit.com).
- 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 Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact (321) 635-7815.
- Si necesita informaci6n en otro idioma, llame al 321-635-7815.

**1-2. TITLE VI COMPLAINT PROCEDURE**

*Title VI Programs must include a copy of the agency's Title VI complaint procedure. The complaint procedure and complaint form shall be available on the recipient's website.*

The following Title VI Complaint Procedure is not currently available on the agency's website, but it should be included to be in compliance with Title VI requirements.

Title VI Complaint Procedure

Title VI of the Civil Rights ACT of 1964 prohibits discrimination on the basis of race, color, or national origin in program activities receiving Federal financial assistance. Title VI states: "No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance" (42 USC 2000d). Further, Title VI provides for Environmental Justice, guaranteeing fair treatment for all people and provide for agencies to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations. Environmental Justice includes taking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to programs, services, and information provided by Space Coast Area Transit.

Any person who believes that he, or she, or any specific class of persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964, as amended, and related statutes under Space Coast Area Transit's program of transit service delivery or related services or programs is encouraged to file a report with Space Coast Area Transit's Office:

Colby Stallings  
Space Coast Area Transit's Civil Rights Officer 401 South Varr  
Avenue, Cocoa, FL 32922  
Telephone (321) 635-7815; Facsimile (321) 633-1905  
Email: Colby.Stallings@brevardfl.gov

Space Coast Area Transit encourages the filing of a complaint in writing and includes a name, addresses, and other information so that you may be contacted in regards to the matter. Please see the attached Title VI Complaint Form. You are asked to provide information regarding:

1. How, why, when, and where you believe you were discriminated against, including the location, names, and contact information for witnesses. If the alleged incident occurred on a Space Coast Area Transit vehicle, provide the bus, give date, time of day, and bus number if available.
2. You must sign your letter of complaint.

All complaints will be investigated promptly. Complaint reviews shall be complete within 60 calendar days of the date the complaint was received. If more time is required Space Coast Area Transit shall notify the complainant of the estimated timeframe for completing the review. Reasonable measures will be undertaken to preserve any information that is confidential. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated. At a minimum, the investigation will:

1. Identify and review all relevant documents, practices, and procedures.
2. Identify and interview persons with knowledge of the Title VI violation, including the person making the complaint, witnesses or anyone identified by the complainant; anyone who may have been subject to similar activity; or anyone with relevant information.

After the investigator reviews the complaint, one of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and interviews regarding the alleged incident, and explains whether disciplinary action, additional training of the staff member, or other action will occur. If a Title VI violation is found to exist, Space Coast Area Transit will take remedial steps, as appropriate and necessary, immediately.

Complainants may also file their initial Title VI complaints directly to the Federal Transit Administration, no later than 180 days after the date of the alleged discrimination. Additionally, if no violation is found and the complainant wishes to appeal the decision, the complainant may contact the Federal Transit Administration as follows:

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
1200 New Jersey Ave., SE  
Washington, DC 20590  
[www.fta.dot.gov/civilrights/title6](http://www.fta.dot.gov/civilrights/title6)

Procedures on how to file a complaint are placed in our offices and on the Space Coast Area Transit website, [www.321transit.com](http://www.321transit.com). If information is needed in another language, contact (321) 635-7815.

Si necesita informacion en otro idioma, llame al (321) 635-7815.

### **1-3. TITLE VI COMPLAINT FORM**

*Recipients must create and make available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form shall be available on the recipient's website. A recipient's Title VI*

Complaint Form shall specify the three classes protected by Title VI—race, color, and national origin—and allow the complainant to select one or more of those protected classes as the basis/bases for discrimination.

The following Title VI Complaint Form is available on the agency’s website. Additionally, a version translated into Spanish should be added to the website.

SPACE COAST AREA TRANSIT TITLE VI COMPLAINT FORM		
<p>Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in program activities receiving Federal financial assistance. Title VI states: "No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance" (42 U.S.C. §2000d).</p> <p>Before completing this form, please read the Space Coast Area Transit Title VI Complaint Procedures located on our website or by visiting our office.</p> <p>The following information is necessary and required to assist in processing your complaint. If you require assistance in completing this form, please contact us at the phone number listed. Complaints must be filed within 180 calendar days after the dated alleged discrimination occurred.</p>		
<b>Section I:</b>		
Name: _____		
Address: _____		
Telephone (Home): _____	Telephone (Work): _____	
Email Address: _____		
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	Yes*	No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining:	_____	
Please explain why you have filed for a third party: _____		
_____		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No
<b>Section III:</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
Date of alleged discrimination (Month, Day, Year): _____		
Location where incident occurred: _____		
Name and title of person who allegedly subjected you to Title VI discrimination: _____		
_____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, attach a separate sheet.		
_____		
_____		
_____		
_____		
_____		
_____		

<b>Section IV</b>		
Have you previously filed a Title VI complaint with Space Coast Area Transit?	Yes	No
<b>Section V</b>		
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 all that apply and name applicable agency:		
<input type="checkbox"/> Federal Agency _____	<input type="checkbox"/> Federal Court _____	
<input type="checkbox"/> State Agency _____	<input type="checkbox"/> State Court _____	
<input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
<i>You may attach any written materials or other information that you think is relevant to your complaint.</i>		

**AFFIRMATION**

I hereby swear and affirm that the information I have provided in this Title VI Complaint Form is true and correct to the best of my knowledge, information, and belief.

\_\_\_\_\_  
Signature Date

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

Colby Stallings  
Space Coast Area Transit’s Civil Rights Officer  
401 South Varr Avenue, Cocoa, FL 32922  
Telephone (321) 635-7815; Facsimile (321) 633-1905  
Email: Colby.Stallings@brevardfl.gov

**LANGUAGE TRANSLATION SERVICE AVAILABLE**

***NOTE: If you require this Title VI Complaint Form to be translated into another language, please click on either “Microsoft Translator” or “Google Translate” at the top right corner of this web page and select the appropriate language for your translation.***

**1-4. LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

*Recipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or sub-recipient that allege discrimination on the basis of race, color, or national origin.*

<u>Complainant</u>	<u>Date</u>	<u>Resolution</u>
Amy Gagnon	September 24, 2013	Complaint Withdrawn
Wanda Simon	March 9, 2015	Was Unfounded

### 1-5. PUBLIC PARTICIPATION PLAN

*Include information about outreach methods to engage minority and LEP populations, as well as a summary of outreach efforts made since the last Title VI submission.*

Space Coast Area Transit completes a variety of public involvement activities to ensure a range of available opportunities for providing feedback on public transit service. The agency recognizes that in compliance with Title VI, public involvement activities must focus on low-income and minority populations and thereby ensures access to the transportation planning process for low-income and minority populations through its public involvement process. Space Coast Area Transit holds a public hearing each time significant changes occur to its fixed-route system to gather input from the public. In addition, Space Coast Area Transit holds two or three public meetings in the communities where the changes are proposed.

As the Community Transportation Coordinator (CTC), Space Coast Area Transit is responsible to a Local Coordinating Board for Transportation Disadvantaged Services (LCB). The LCB in Brevard County meets quarterly and deals with a variety of transportation issues and is not limited to transportation disadvantaged (TD) discussions. The purpose of the LCB is to evaluate service levels, safety, and other issues of transit operations provided by Space Coast Area Transit serving the elderly, people with disabilities, or otherwise disadvantaged citizens in Brevard County. At every meeting, the public is given an opportunity to comment to this Board about public transportation in Brevard County.

Additional opportunities for public participation will be given as part of the Transit Development Plan (TDP) update in 2017.

**Table 1 – Public Participation Meeting Dates**

Meeting Type	Dates
LCB	March 13, 2017, May 15, 2017, August 14, 2017 and November 13, 2017
Public Workshops	November 13, 2017
On-Board Survey	November 2016
TDP Public Meetings	February 2017; April 2017
Brevard County Board Meetings	Two meetings each month, except for June 2017

Space Coast Area Transit provides all program information on its website and posts flyers with similar information on buses. Legal advertisements and press releases detail opportunities for the public to communicate opinions and ideas. In keeping with the Title VI process, the following notices may be provided:

1. Interior signs on all Space Coast Area Transit buses.
2. Posters at transit terminals and Space Coast Area Transit headquarters.
3. Flyers distributed on all Space Coast Area Transit buses.
4. Website has a link for Title VI complaint process.

#### *Transit Development Plan*

Space Coast Area Transit, as part of the process for planning services and determining its capital program, develops a TDP. Statute requires Florida transit agencies to complete a major update every five years and in the interim years provide annual progress reports on any changes and accomplishments in implementing the Plan. The TDP is a requirement to receive block grant operating assistance from the FDOT. Space Coast Area Transit completed its Major TDP Update in September 2012 for fiscal years 2013-2022. Through the TDP public involvement process, the community has an opportunity to provide feedback on existing and future planning projects, transit services, and capital investments. The most recent TDP Major Update included an extensive public involvement process. The 2013-2022 TDP Update public involvement activities were as follows:

#### Public Workshops

As part of the TDP planning process, Space Coast Area Transit held two rounds of two workshops for a total of four public workshops. The first workshop was held in coordination with the Space Coast Transportation Planning Organization (TPO) at the Brevard County Government Center, the second workshop was conducted at the Hammock Landing Transfer Center, the third workshop was held at the Space Coast Area Transit north facility located on Varr Avenue, and the final workshop was held at the Searstown Mall. The workshops were geographically dispersed to encourage participation from citizens across Brevard County.

#### Brevard County Government Center

The workshop at the Brevard County Government Center began with brief presentations on both TPO project priorities and the TDP. Attendees were asked for any questions and to complete a survey prior to leaving. The workshop was open-house style and participants were encouraged to walk around the room and review the maps and other materials provided. While the format was informal, staff was present at the meeting facility for the timeframe publicly noticed to answer any questions about the plan and describe the services. Schedules and maps were also available. Comments provided on the project survey indicated that Space Coast Area Transit is doing a good job and later evening service is needed.

#### Hammock Landing Transfer Center

The workshop at the Hammock Landing Transfer Center was open-house style with maps, surveys, and Space Coast Area Transit information set up inside of a fixed-route bus. As the passengers arrived at the transfer center, they were encouraged to board the bus, review the information, and provide input for the TDP. For those passengers that either did not want to board the bus or felt there was not enough time between their transfers to participate, staff members asked them to fill out surveys or provide verbal input on the existing and future transit services in Brevard County.

Space Coast Area Transit North Terminal

The workshop at the Space Coast Area Transit North Terminal was conducted in coordination with the TPO. The format was open-house style with maps, surveys, PowerPoint handouts, and information on the TPO's priority projects and programs. Participants were encouraged to review the list of draft alternatives and provide input on the proposed improvements and new services.

Searstown Mall

The workshop at the Searstown Mall was conducted in coordination with the TPO. The format was open-house style with maps, surveys, PowerPoint handouts, and information on the TPO's priority projects and programs. Participants were encouraged to review the list of draft alternatives and provide input on the proposed improvements and new services.

On-Board Survey

As part of the TDP public involvement process, an on-board survey of bus passengers was conducted on a weekday (April 26, 2012) and a Saturday (April 28, 2012). The number of completed surveys is shown in Table 2. On-board surveys are an important service assessment tool employed by public transportation agencies. Feedback from the on-board survey effort will assist Space Coast Area Transit in planning for immediate service improvements and in determining future transit need in Brevard County. In addition, Space Coast Area Transit can use the on-board survey results to determine the demographic make-up and travel characteristics of its existing customer base.

As of the writing of the updated Title VI plan in February 2017, the data received in the November 2016 TDP On-Board Survey was not available.

Space Coast Area Transit disseminated on-board surveys in both English and Spanish to ensure that Spanish-speaking customers have meaningful access to provide input in the planning process. This process also reaches out to obtain input from low-income and minority persons who may not attend a formal public meeting. To view the TDP in its entirety, visit the Space Coast Area Transit website at [www.321transit.com](http://www.321transit.com), and click on the Public Documents tab.

**Table 2 – Completed Survey Summary by Language**

Language	Number of Completed Surveys	Percent
English	1,873	96.8%
Spanish	62	3.2%
<b>Total</b>	<b>1,935</b>	<b>100.0%</b>

**1-6. LANGUAGE ASSISTANCE PLAN**

*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.

### 1. Results of the Four Factor Analysis, including a description of the LEP population(s) served

To continue reaching LEP persons in Brevard County, Space Coast Area Transit conducted targeted needs assessments and gathered data to gain an understanding of the public transportation needs. Space Coast Area Transit used the four-factor framework provided in Section V of the DOT LEP Guidance to determine the following:

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

Space Coast Area Transit continually provides information to LEP residents of the community. According to data from the 2015 American Community Survey (ACS), Brevard County's population aged 5 years and over is 527,527, with 89.5 percent speaking English. The ACS estimates that 32,258 people, 6.1% of the population, speak Spanish or Spanish Creole. Table 3 provides a detailed breakdown of the languages spoken in Brevard County. Three percent of the total population speaks English less than "very well." Spanish speakers comprise the greatest proportion of those who speak English less than very well (1.98%), followed by French Creole (0.5%), and Chinese (0.24%). Map 1 and Map 2 show the spatial locations of workers in Brevard County who speak English less than "very well." Map 1 provides LEP populations by Census Tract compared with the total population. Map 2 shows the location of LEP populations who use public transportation to get to work. Space Coast Area Transit has targeted Spanish speakers as the predominant LEP population for assistance. The agency will continue to target areas with a high proportion of LEP populations to ensure all needs for assistance are met.

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

The demographic portion of the on-board survey conducted in April 2012 as part of the TDP update includes a variety of questions regarding respondent household income levels, age, gender, and ethnicity, among other things. Space Coast Area Transit is experiencing a declining share of white ridership when compared to the 2008 survey results. As shown in Figure 1, African American and Hispanic riders are increasing. Compared with county-wide demographic composition as reflected in 2010 Census data, the black cohort and cohort of riders with a household income of less than \$15,000 are disproportionately represented in the survey results. The percentage of respondents who indicated riding the bus four or more days per week increased from 51.0 percent in 2004 to 72.3 percent in 2012, while the percentage of respondents who indicated riding the bus a few times a month experienced a drop from 14.8 percent 2004 to 4.2 percent in 2012.

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

Due to the number of Spanish-speaking residents, system maps, fare brochures, on-board surveys, and public notices are translated into Spanish. Customer Service Representatives who speak Spanish provide assistance for those passengers who need Spanish

Table 3 – Languages Spoken in Brevard County

Language Spoken at Home (Population Age 5 and Above)			
Language	Total Population	Population Speaking English Less than "Very Well"	Percent of Total Population Speaking English Less than "Very Well"
Spanish or Spanish Creole	32,258	10,452	1.98%
French Creole	1,336	285	0.05%
Chinese	2,108	1282	0.24%
Vietnamese	1,068	734	0.14%
French (including Patois, Cajun)	2,757	285	0.05%
Italian	1,274	277	0.05%
Tagalog	1,656	441	0.08%
German	2,402	358	0.07%
Arabic	1,640	463	0.09%
Portuguese or Portuguese Creole	700	159	0.03%
Russian	414	85	0.02%
Korean	435	268	0.05%
Gujarati	1,142	551	0.10%
Polish	691	214	0.04%
Thai	499	345	0.07%
Other Pacific Island languages	172	61	0.01%
Hindi	421	82	0.02%
Japanese	413	116	0.02%
Other Indo-European languages	232	75	0.01%
Mon-Khmer, Cambodian	38	21	0.00%
Scandinavian languages	176	26	0.00%
Greek	419	66	0.01%
Other Indic languages	341	206	0.04%
Other Asian languages	488	121	0.02%
Other Slavic languages	217	60	0.01%
Serbo-Croatian	47	0	0.00%
Hebrew	217	15	0.00%
Hungarian	134	30	0.01%
Persian	129	50	0.01%
African languages	287	37	0.01%
Other West Germanic languages	656	59	0.01%
Armenian	36	0	0.00%
Other Native North American languages	30	16	0.00%
Other and unspecified languages	73	7	0.00%
Yiddish	23	0	0.00%
Navajo	9	0	0.00%
Urdu	333	112	0.02%
English	472,256	-	-
<b>Total</b>	<b>527,527</b>	<b>17,359</b>	<b>3.29%</b>

Source: U.S. Census Bureau, 2011-2015 American Community Survey



Map 2 – LEP Population Using Public Transportation to Commute

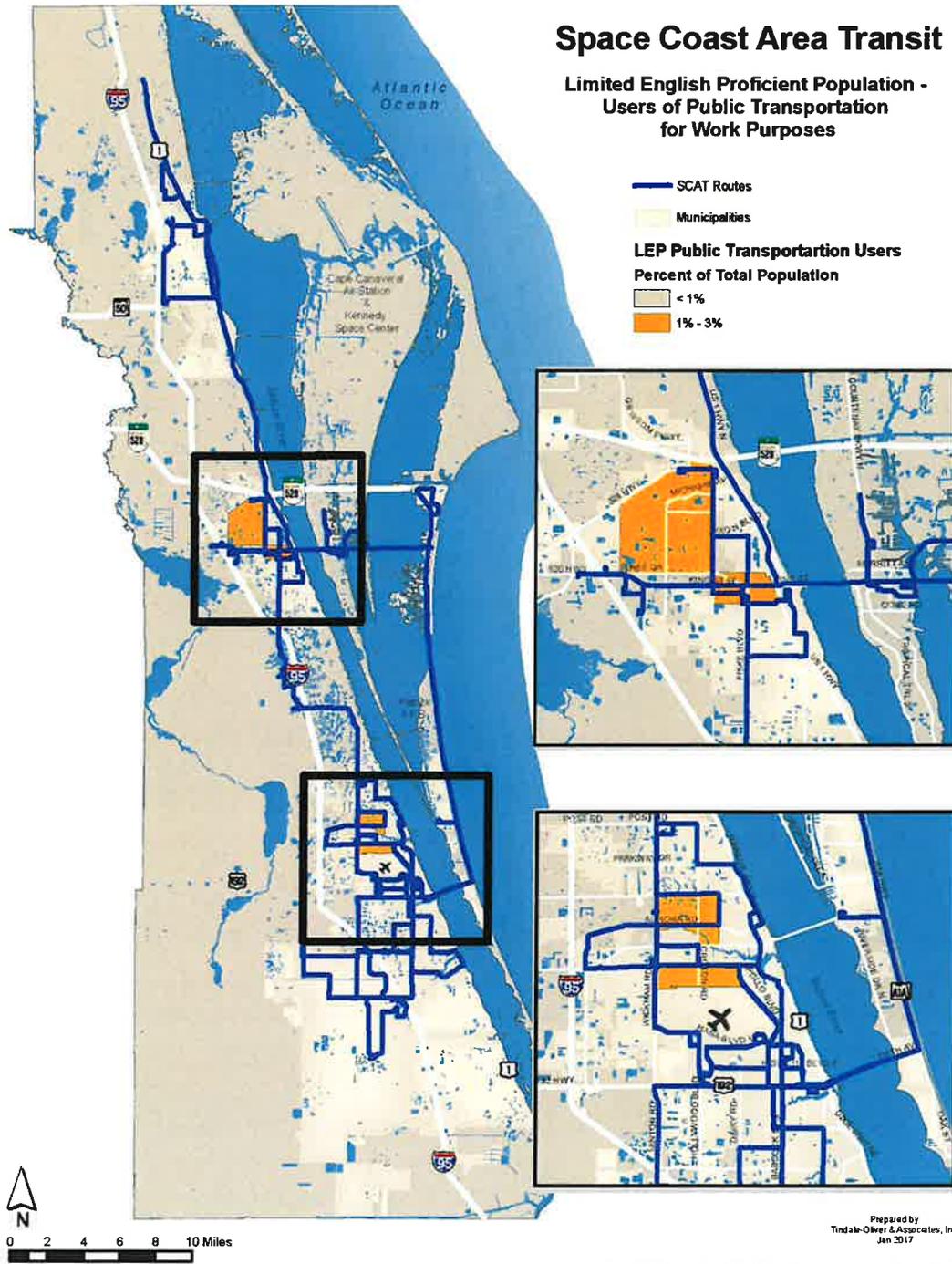
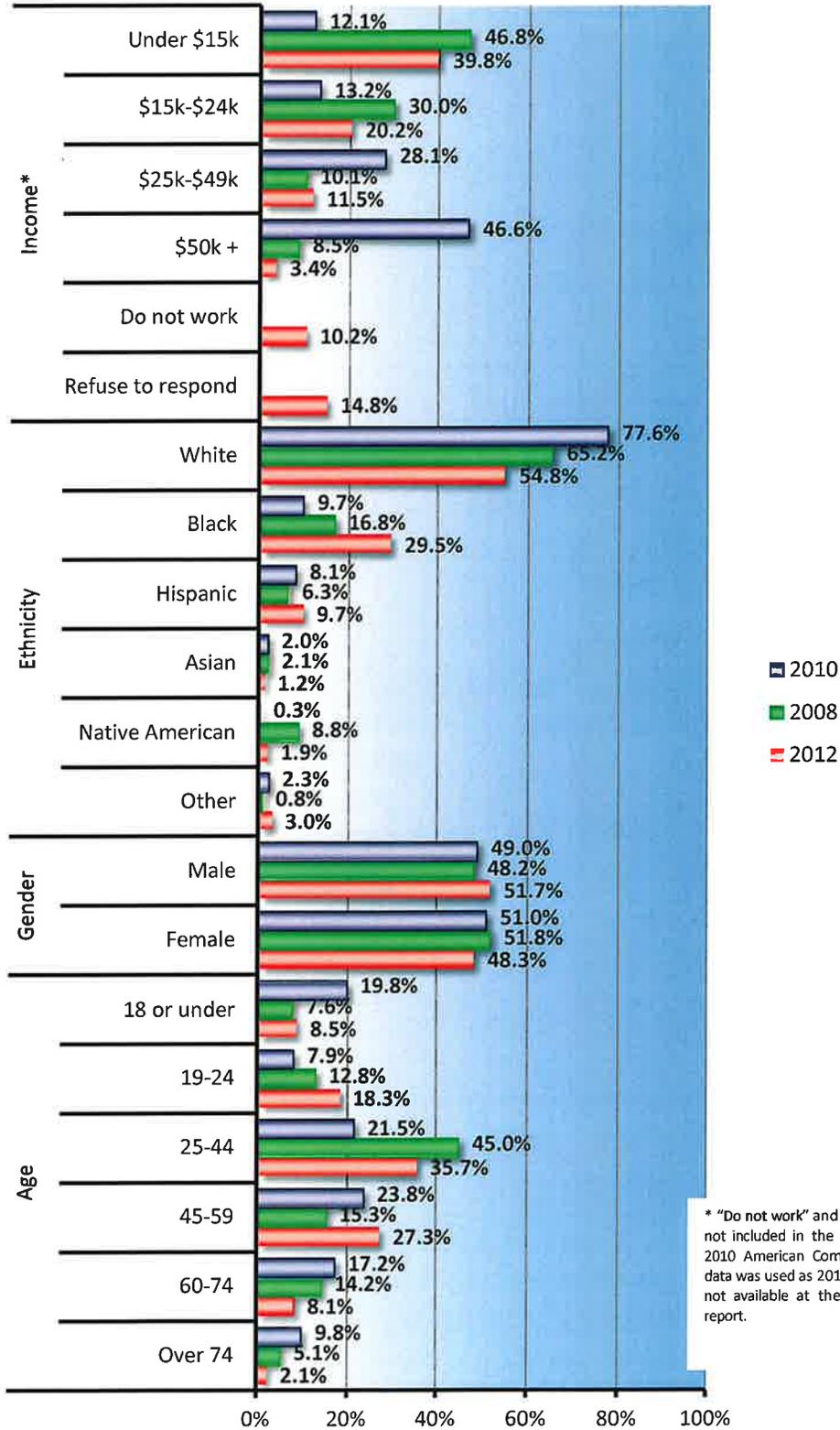


Figure 1 – On-Board Survey: Space Coast Area Transit Rider Demographics



translation. The results of this effort have assisted Space Coast Area Transit in better serving LEP populations.

- **Factor 4 – The costs and resources available.**

Based on the current resources available, Space Coast Area Transit is providing the most cost-effective means of delivering competent and accurate language services within its service area. Space Coast Area Transit will 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, Space Coast Area Transit will determine which additional language assistance measures are cost-effective and feasible for implementation based on the current and projected financial resources.

## **2. 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. Space Coast Area Transit recognizes that this information indicates special effort is necessary to communicate important transit information to some of our riders. In order to meet this need, Space Coast Area Transit takes the following steps:

- Seek out opportunities to conduct outreach to the community and faith-based organizations serving minority populations.
- Provide language assistance on its customer service hotline.
- Participate in updates to the County's evacuation and disaster preparedness plans to ensure the plans include the needs of all community members, and especially LEP, low-income, and minority populations.
- Continue to review programs, activities, and services provided to ensure that LEP persons can participate and utilize our services.

To determine how best to continue reaching LEP persons in Brevard County and improve current ongoing efforts, Space Coast Area Transit conducts targeted needs assessments and gathers data to gain an understanding of the need.

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

Space Coast Area Transit provides notice to LEP persons and provides language assistance in a number of ways, including the following:

- *Transit Stations*
  - Information on how to access Space Coast Area Transit services, bus schedules, fare schedules including instructions on how to make fare payments, and instructions on riding the with a bicycle are available in both English and Spanish.

- *Safety and Security*
  - Announcements are provided in both English and Spanish when the buses are equipped with an automated voice recorder. Many Space Coast Area Transit drivers speak Spanish and can make announcements in both English and Spanish.
- *Website*
  - Currently, Space Coast Area Transit's website [www.321transit.com](http://www.321transit.com) provides visual aids and maps to provide information regarding transit services, including trip planning information.
- *Radio and TV*
  - Announcements include broadcasts on both English and Spanish-speaking stations.
- *Training*
  - Driver training for new employees and refresher training provided annually to drivers reminds them of the importance of conveying information to passengers as part of their customer service training. Drivers are instructed to provide assistance to passengers or request assistance to facilitate the use of the transit system for all passengers, especially those with language or other barriers.
- *Customer Service*
  - Telephone lines are equipped to the extent possible with persons who speak Spanish and English. Personnel who are bilingual are identified for providing assistance.
- *Translated Material*
  - Spanish versions of surveys, meeting notices, and press releases are made available upon request.
- *Telecommunications Device for the Deaf (TDD)*
  - Space Coast Area Transit has a TDD dedicated line.
- *Community Outreach*
  - Space Coast Area Transit makes available persons who can serve as translators at all community outreach meetings, as requested.

#### **4. Describe how the recipient monitors, evaluates, and updates the language access plan**

Space Coast Area Transit provides an ongoing needs assessment to determine how best to continue reaching LEP persons in Brevard County and improving ongoing efforts. To ensure that the intent of the LEP plan remains current, Space Coast Area Transit staff will continue to monitor and update the plan and report progress every three years. These efforts will include the following actions:

- Monitor current LEP populations in the service area and in emerging populations affected or encountered.
- Document and monitor frequency of encounters with LEP language groups.
- Assess the availability of resources, including technological advances (e.g., ITS projects) and sources of additional resources and the cost imposed.

- Assess its success in meeting the needs of the LEP persons.
- Communicate the goals and objectives of the LEP plan and evaluate the opportunity for community involvement and planning.
- Strive to identify sources of assistance and opportunities to implement LEP goals.
- Post signs at intake areas and other entry points to communicated language services available at initial contact points. Space Coast Area Transit will continue to provide signage and written information at vehicle and transfer stations in other languages.
- Include language services available on outreach documents, brochures, booklets, and in recruitment materials.
- Whenever possible, make announcement in vehicles in other languages.
- Whenever possible, make available telephone voicemail and menu systems in Spanish and services about how to get them.
- Publish notices and other information in local newspapers in languages other than English. Space Coast Area Transit will utilize non-English language radio and television stations to provide information on language assistance services and how to access services. Press releases, newspaper, radio, and television communication will be provided in other languages.
- Conduct outreach presentations and notices to schools, community, and faith-based organizations. Space Coast Area Transit will provide announcements and collect information on how best to serve LEP persons through community and faith-based organizations.
- When possible, include Spanish and other languages on its website.
- Strive to provide excellent customer service, in-person and over the phone, in other languages. Front-line personnel will routinely provide information on LEP persons in order to best address identified needs.
- Participate to the greatest extent possible in local events.

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

Space Coast Area Transit provides ample training opportunities for employees to assist LEP populations with timely and reasonable language assistance. Space Coast Area Transit will continue the following activities:

- Continue to provide information on LEP policies and procedures as part of new employee orientation and staff re-training.
- Require staff to complete customer service training and be provided guidance on working effectively with in-person and telephone interpreters.
- Inform recipient staff how LEP services can be obtained.
- Train staff on how to respond to LEP persons including callers, through written communications, and through in-person contact.
- Strive to ensure the competency of interpreters and translation services per DOT LEP Guidance Section VII(2).

**1-7. MINORITY REPRESENTATION ON COMMITTEES AND COUNCILS**

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

As a division of the Brevard County Government, Space Coast Area Transit's decision-making body is the Brevard County Board of County Commissioners (BOCC). The BOCC is an elected Board. The BOCC is comprised of two white females, and three white males.

The Brevard County LCB, established by Chapter 427 of the Florida Statutes, consists of 15 members serving three-year terms of appointment from various state and local agencies and general interest groups. The LCB provides direction and advice on TD services in Brevard County to Space Coast Area Transit. While most members of the LCB serve through appointment, a three-member subcommittee consisting of a representative from Space Coast Area Transit, the LCB, and the Space Coast TPO reviews applicants for the remaining non-appointed seats and makes recommendations to the Space Coast TPO for approval. The Space Coast TPO and Space Coast Area Transit are aware of Title VI requirements when selecting members.

**1-8. SUBRECIPIENT COMPLIANCE WITH TITLE VI**

*Title 49 CFR Section 21.9(b) states that if "a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part." Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding, in order to assist the primary recipient in its compliance efforts, on a schedule to be determined by the primary recipient. Subrecipients may choose to adopt the primary recipient's notice to beneficiaries, complain procedures and complaint form, public participation plan, and language assistance plan when appropriate.*

Currently, Space Coast Area Transit does not provide Federal Transit financial assistance to any subrecipients. If Space Coast Area Transit provides assistance to a subrecipient, a compliance review consisted of the following activities:

- On-site visit to each agency for evaluation of program operations;
- Review of financial records for proper recording, matching of grant revenue, and to ensure an audit in compliance with A-133 was conducted;
- Random check of vehicles providing service;
- Document that the agency meets Federal certifications and assurances consistent with the designated recipient as appropriate; and
- Review that each agency has completed appropriate registrations and program notifications.

#### **1-9. TITLE VI EQUITY ANALYSIS**

*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 groups of race, color, or national origin.*

Space Coast Area Transit has not constructed any new facilities (vehicle storage facility, maintenance facility, operation center, etc.) since the time of the last Title VI submittal. Space Coast Area Transit's policy is to equitably distribute capital equipment and facilities throughout Brevard County.

#### **1-10. BOARD APPROVAL OF TITLE VI DOCUMENTATION**

*A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.*

The Brevard County Board of County Commissioners, in regular session on February 7, 2017, adopted the 2012 Title VI Update Report for Space Coast Area Transit as required by FTA. Official documentation of approval can be found in Appendix A.

## SECTION 2 – PROGRAM-SPECIFIC REQUIREMENTS

Chapter IV of FTA Circular 4702.1B provides program-specific guidance for recipients that operate 50 or more fixed-route vehicles in peak service and are located in a geographic area with a population of 200,000 or greater. Since Space Coast Area Transit operates only 29 vehicles in peak service, the agency is required to set system-wide standards and policies, but other guidelines identified in this section are not applicable. Map 3 shows the existing Space Coast Area Transit routes and Brevard County.

Map 3: Space Coast Area Transit System Map



## 2-1. SERVICE STANDARDS

*In order to comply with 49 CFR §21.5(b)(2) and (7), Appendix C to 49 CFR part 21, recipients to which this chapter applies shall adopt quantitative system-wide service standards necessary to guard against discriminatory service designs or operations decisions.*

FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for four indicators. Individual public transportation providers will set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry.

### VEHICLE LOAD

Vehicle load or load factor is a ratio of the number of seats on a vehicle and the number of passengers on a particular route during periods of peak travel. Load factors are used by transit systems to determine the extent of probable overcrowding or the need for additional vehicles. Space Coast Area Transit maintains a policy of allowing standees on any of its buses. Space Coast Area Transit's goal is to operate vehicle loads at a threshold that meets safety and performance standards. Space Coast Area Transit monitors vehicle loads through feedback from passengers, on-the-road supervision, periodic ride checks, and online customer comments. Once overcrowding is reported, staff conducts follow-up checks to ensure that the vehicles assigned to these trips can accommodate peak passenger loads.

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are described in Table 4. During off-peak hours, Space Coast Area Transit's policy is to have no standing passengers.

**Table 4 – Vehicle Load Factors**

Vehicle Type	Average Passenger Capacities			Maximum Load Factor	
	Seated	Standing	Total	Off-Peak	Peak
30' Standard Bus	28	6	34	1.0	1.2
31' Standard Bus	24	5	29	1.0	1.2
35' Low Floor Bus	32	16	48	1.0	1.5
40' Low Floor Bus	39	19	58	1.0	1.5

### Procedures

1. The largest vehicles will be assigned to those routes that carry the highest number of passengers per revenue hour.
  - a. Space Coast Area Transit will evaluate the maximum passenger loads for selected high-volume routes to ensure that the vehicle(s) assigned to these routes can accommodate peak passenger loads.

2. New buses will be assigned to routes based upon factors such as seating capacity and system-wide wheelchair accessibility.
  - a. When a new bus has a smaller capacity than the bus it is to replace, passenger loads will be evaluated to ensure the new bus will accommodate the market demand.
  - b. Space Coast Area Transit will monitor bus assignments and the distribution of equipment within the service area.
3. Space Coast Area Transit will maintain a bus inventory which includes vehicle length, seating capacity, ancillary bus equipment, purchase date, and useful life of the vehicle.

#### **VEHICLE HEADWAY**

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 separating vehicles traveling in the same direction on the same route for peak and off-peak service. Routes with the most frequent service generally have the highest levels of service in terms of the number of vehicles assigned and the total number of daily revenue hours. Space Coast Area Transit has more frequent service (i.e., 30-minute service frequency) on the most productive routes in the system. Of 19 fixed routes, the routes with 30-minute service are Routes 4, 6, 9, 21, 25 and 28. The remaining services operate every 60 minutes, with one route at 120 minutes.

The Space Coast Area Transit 2012-2021 TDP identified a number of improvements to existing transit service to accommodate current demand. The improvements included increasing hours of service later in the evening, adding Saturday and Sunday service, and increasing frequency on most routes to a half-hour. Table 5 shows Space Coast Area Transit's quantitative ideal vehicle headways on a route-by-route basis. These headways correspond to the proposed improvements identified in the TDP. As a general rule, the proposed headways are scheduled to operate throughout the day. Table 6 shows the Space Coast Area Transit policy headways by route type. Route type should be considered when implementing new service.

#### *Procedures*

1. Routes and schedules will be monitored to improve system connectivity and timed transfers.
2. Routes will be evaluated according to passenger productivity to determine the need for improved service frequency.
3. Routes will be evaluated according to improvements proposed in the TDP.

**Table 5 – Existing and Proposed Headways**

Route	Type	Weekday		Saturday		Sunday	
		Existing Headways	TDP Proposed Headways	Existing Headways	TDP Proposed Headways	Existing Headways	TDP Proposed Headways
Route 1	Regional	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 2	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 3	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 4	Urban Radial	30 minutes	15 minutes	30 minutes	15 minutes	60 minutes	30 minutes
Route 5	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 6	Urban Radial	30 minutes	15 minutes	60 minutes	30 minutes	-	60 minutes
Route 7	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes		60 minutes
Route 8	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 9	Beach Trolley	30 minutes	15 minutes	30 minutes	15 minutes	60 minutes	30 minutes
Route 21	Downtown Circulator	30 minutes	15 minutes	60 minutes	30 minutes	60 minutes	30 minutes
Route 22	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 23	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 24	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 25	Urban Radial	30 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 26	Urban Radial	120 minutes	60 minutes	120 minutes	60 minutes	-	60 minutes
Route 27	Urban Radial	60 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 28	Urban Radial	30 minutes	30 minutes	60 minutes	30 minutes	-	60 minutes
Route 29	Regional	60 minutes	30 minutes	60 minutes	30 minutes		60 minutes
Route 32	Dial-A-Bus	As Requested	As Requested	-	-	-	60 minutes

**Table 6 – Policy Headways**

Type	Weekday	Saturday	Sunday
Regional	60 minutes	60 minutes	60 minutes
Urban Radial	60 minutes	60 minutes	60 minutes
Downtown Circulator	30 minutes	30 minutes	60 minutes
Beach Trolley	30 minutes	30 minutes	60 minutes

**ON-TIME PERFORMANCE**

Space Coast Area Transit continually strives for on-time bus service at all stops. The agency tracks on-time performance and records the number of early, on-time, and late arrivals at major time points. The service standard for on-time performance is 90 percent. If a bus arrives more than two minutes ahead of schedule, it is classified as “early,” and if it arrives more than six minutes behind schedule, it is classified as “late.” Buses arriving in between those two parameters are considered “on-time.”

*Procedures*

1. Each month, Space Coast Area Transit will follow up and evaluate customer complaints, road supervisor reports, and any ridecheck reports which pertain to on-time performance.
2. Space Coast Area Transit will monitor on-time performance to determine the cause for delays and recommend changes in scheduling or routing when necessary.

**SERVICE AVAILABILITY**

Service availability is a measurement of the distance a person must travel to gain access to transit service. Access can be measured in time intervals, so that it can be included as a component of the calculation of travel time. Transit access is a general measure of the distribution of transit service within a transit district. Standards developed with respect to transit access would apply to existing services as well as any proposed service modifications affecting transit service levels. Space Coast Area Transit makes every effort to ensure that transit services are accessible to all persons in Brevard County and are provided in a manner consistent with the Americans with Disabilities Act (ADA).

*Procedures*

1. Space Coast Area Transit will maximize the general coverage of transit service in the service area, while following a market-driven implementation strategy. Space Coast Area Transit will continue to emphasize service enhancements for major urban roadway corridors serving major transit generators and attractors.
2. Space Coast Area Transit will support and promote land use designs which shorten the walking distance to bus stops.
3. Routes that are not meeting performance standards will be evaluated to determine the productivity of route segments that are duplicative. Any proposed realignment will then be evaluated based upon the number of transit generators and attractors within a quarter-mile of transit service.
4. 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.
5. Space Coast Area Transit will evaluate routes that are recommended for elimination to determine the impact on minority users.
6. Space Coast Area Transit will request that city, county, and state governmental entities include Space Coast Area Transit in the development review process for pedestrian accessibility to transit stops. Space Coast Area Transit staff will recommend developments that are mixed use and include multiple points of direct and convenient pedestrian access to transit stops.
7. Land development designs that are conducive to pedestrian activity or transit service will be supported by Space Coast Area Transit and promoted for new developments and redevelopments.
8. Space Coast Area Transit will attend pre-construction meetings so that contractors are aware of accessibility needs with respect to sidewalk and roadway construction.
9. Space Coast Area Transit will continue to work cooperatively with state and local jurisdictions on passenger loading pads, pedestrian bridges (for swale crossings), and accessible connections from sidewalks to bus stops, whenever a roadway is constructed, re-constructed or re-surfaced. All accessibility improvements will conform to ADA requirements.
10. Space Coast Area Transit will continue to conduct periodic market research to determine the distance most users must travel to gain access to transit service. Market research should be undertaken at minimum every three years.

## 2-2. SERVICE POLICIES

*In order to comply with 49 CFR §21.5(b)(2) and (7), Appendix C to 49 CFR part 21, recipients to which this chapter applies shall adopt quantitative system-wide service policies necessary to guard against discriminatory service designs or operations decisions.*

FTA requires that all providers of fixed-route public transportation develop qualitative policies for two indicators. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.

### TRANSIT AMENITIES

Transit amenities are items of comfort and convenience such as passenger benches and shelters. Transit operators must address how these amenities are distributed within a transit system, since the manner in which amenities are distributed determines whether transit users have equal access to them. The primary factor in assessing what type of bus stop should be implemented at a particular location is the amount of daily passenger activity that typically occurs. The potential for bus passenger activity at any particular spot can be influenced by a number of variables, including the population and employment density of the surrounding area, the intensity and type of nearby land use, the accessibility and design of the site, and the condition of the adjacent traffic facilities. Capital equipment and facilities will be equitably distributed throughout Brevard County.

#### *Policies*

1. Passenger shelters will be installed at high usage bus stops throughout the Space Coast Area Transit service area.
2. Passenger benches will be installed to provide seating at Space Coast Area Transit bus stops.
3. Bicycle racks will be installed at major transfer points and other bus stops when installation can be justified according to market demand.
4. All vehicles will be equipped with bike racks.
5. All passenger amenity installations will be constructed in accordance with ADA implementation regulations.

#### Passenger Shelters

1. Space Coast Area Transit will establish a bus shelter implementation and maintenance plan that identifies potential shelter locations through ridership data, passenger requests, and recommendations from bus drivers.
  - a. Public/private facilities such as libraries, hospitals, municipal buildings, shopping centers, educational, residential and employment centers will also be identified as potential shelter locations and evaluated according to ridership data.
  - b. Space Coast Area Transit will investigate shelter locations when requests are received from passengers.

2. Space Coast Area Transit will include the location of shelters and their distribution within the transit service area in each TDP update.
3. Passenger shelter contractors will schedule cleaning of the shelters at regular intervals. Staff will periodically inspect the shelters and report any damage to Space Coast Area Transit to enable timely repair.

#### Passenger Benches

1. Space Coast Area Transit will place benches at locations that are requested by staff and/or passengers.
2. Space Coast Area Transit will request construction of bench pads to be part of roadway and sidewalk projects whenever feasible.
3. Space Coast Area Transit will establish an inventory of benches that includes a maintenance schedule and existing accessibility features. Space Coast Area Transit will monitor bench placements and the distribution of benches within the service area for Title VI considerations.

#### Bicycle Racks

1. Space Coast Area Transit will identify locations where bicycle racks should be installed and schedule installation.
2. Space Coast Area Transit will create and monitor bicycle rack inventory and will notify the Planning Department when additional racks or maintenance is needed.
3. All fixed-route buses will be equipped with bicycleracks.

#### **VEHICLE ASSIGNMENT**

Space Coast Area Transit vehicles are assigned by Vehicle Operator Vs. Some buses are assigned to specific runs based on load factors and the number of wheelchair requirements. The process by which transit vehicles are assigned to routes throughout the system due to:

- a. Variations among vehicles (e.g., age, type or size, amenities, etc.)
- b. Types of service offered (e.g., express or local, long- or short-haul, etc.)
- c. Timing of vehicle assignment, (e.g., time of day, day of week, holiday/non-holiday, etc.)
- d. Other factors (e.g., origin points of vehicles, etc.)

#### *Policies*

1. Space Coast Area Transit will consider peak load requirements and assign vehicles with additional capacity to routes with the highest passenger productivity (i.e., passengers per revenue hour). Conversely, Space Coast Area Transit will assign smaller vehicles to routes with the lowest passenger productivity.

## CONCLUSION

This Space Coast Area Transit Title VI update has been prepared pursuant to Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, "Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients" (October 1, 2012). The objectives detailed in this Title VI program include ensuring that Federally-assisted benefits and related services are made available and equitably distributed, ensuring that the level and quality of Federally-assisted services are sufficient to provide equal access and mobility to all persons, ensuring adequate opportunities for all to participate in planning and decision-making processes, and ensuring that placement of transit services and facilities is equitable. Additionally, this Title VI update ensures that corrective and remedial actions are taken for all applications and receipts of Federal assistance to prevent discriminatory treatment of any beneficiary, provides procedures for investigating Title VI complaints, ensures that meaningful access to programs and activities is provided for LEP populations, and provides steps for informing the public of their rights under Title VI. According to the criteria described in this document, Space Coast Area Transit is in compliance with Title VI requirements.

**APPENDIX A:  
BOARD APPROVAL OF TITLE VI DOCUMENTATION**

