Public Participation Plan

Bay County Transportation Planning Organization

Public Participation Plan

staffed by Emerald Coast Regional Council
RESOLUTION BAY 19-04

A RESOLUTION OF THE BAY COUNTY TRANSPORTATION PLANNING ORGANIZATION ADOPTING THE PUBLIC PARTICIPATION PROCESS PLAN

WHEREAS, the Bay County Transportation Planning Organization (TPO) is the organization designated by the governor of Florida as being responsible, together with the state of Florida, for carrying out the provisions 23 U.S.C. 134, as amended by the FAST Act; and

WHEREAS, 23 Code of Federal Regulations (CFR), Part 450, Subpart C, Section 316 (b)(1) states the metropolitan planning process shall, “include a proactive public participation process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing participation of the public in developing plans” and;

WHEREAS, in general, federal legislation built upon previous transportation legislation (ISTEA, TEA-21 and SAFETEA-LU) to provide states and metropolitan planning organizations specific direction in conducting and promoting broad-based public participation activities; and

WHEREAS, federal legislation requires metropolitan planning organizations to provide citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled and other interested parties with a reasonable opportunity to comment on the transportation plan;

NOW, THEREFORE, BE IT RESOLVED BY THE BAY COUNTY TRANSPORTATION PLANNING ORGANIZATION THAT:

1) The TPO has reviewed its public participation procedures, hereafter referred to as Public Participation Plan, to assure that full and open access to the TPO decision-making process is provided for all citizens, and finds the document to be in compliance with the Code of Federal Regulation (CFR 450.316) and the Florida Metropolitan Planning Organization (MPO) Handbook.

2) The TPO adopts the Public Participation Plan.

Passed and duly adopted by the Bay County Transportation Planning Organization on this 24th day of July 2019.

BAY COUNTY TRANSPORTATION PLANNING ORGANIZATION

BY: [Signature]

Pamn Henderson, Chairperson

ATTEST: [Signature]
Table of Contents

Table of Contents ........................................................................................................... 3
Summary .............................................................................................................................. 1
  Intent of the Public Participation Plan .............................................................................. 5
  Bay County TPO Policy on Public Participation ............................................................. 5
  Federal Requirements for Public Participation ............................................................... 6
  Achieving the Best Public Participation ......................................................................... 7
Organizational Structure .................................................................................................... 8
  History .............................................................................................................................. 8
  Transportation Planning Organization Board ............................................................... 9
  Citizen Advisory Committee ......................................................................................... 10
  Technical Coordinating Committee ............................................................................. 10
  Interested Parties .......................................................................................................... 10
  Stakeholders .................................................................................................................. 11
Traditionally Underserved Populations .......................................................................... 12
  Identification of Special Populations .............................................................................. 12
  Environmental Justice .................................................................................................... 12
  Title VI, ADA, and LEP .................................................................................................. 13
Public Participation Goals and Techniques .................................................................... 14
  Goal 1: Inform the Public ............................................................................................... 14
  Goal 2: Involve the Public .............................................................................................. 15
  Goal 3: Include the Public ............................................................................................. 15
  Goal 4: Improve the Public Participation Process ......................................................... 16
Methods for Achieving Good Public Involvement ......................................................... 17
Long Range Transportation Plan .................................................................................... 20
Project Priorities and Transportation Improvement Program ........................................ 25
Unified Planning Work Program ...................................................................................... 26
Administrative Modifications .......................................................................................... 27
Amendments .................................................................................................................... 27
Additional TPO Projects and Plans .................................................................................. 27
Assessment of Public Participation Strategies ............................................................... 30
Evaluation Tools .............................................................................................................. 30
Evaluation Metrics ......................................................................................................... 30
Performance Measures ................................................................................................... 30
List of Acronyms........................................................................................................................................33
Appendix I..................................................................................................................................................33
Appendix II................................................................................................................................................34
Appendix III................................................................................................................................................35
Appendix IV................................................................................................................................................36
Summary
The transportation planning process blends technical analysis and input from public and private transportation partners to identify priorities, choices, and risks to the transportation system within the Bay County Transportation Planning Organization (TPO) study area. It is also used to distribute resources for future investments. Long-range planning is required to be eligible for federal and state transportation funding assistance, given the vast amount of money invested in the system each year.

A TPO is designated to carry out the metropolitan transportation planning process. This process is accomplished through a forum of cooperative, comprehensive, and continuing transportation decision making.

TPOs are established in a study area with a population of 50,000 or more, determined by the U.S. Census. The Bay County TPO is the policy board for the urbanized areas within Bay County, Fla. The principle responsibilities of the Bay County TPO include the development of a Unified Planning Work Program (UPWP), a 20-year Long Range Transportation Plan (LRTP), a five-year Transportation Improvement Program (TIP), a Congestion Management Process (CMP), and a Public Participation Plan (PPP), and related planning studies and projects deemed necessary to address transportation issues in the Bay County TPO study area.
The Bay County TPO created the Public Participation Plan (PPP) to provide guidelines for achieving optimal engagement of the public when developing major planning documents and programs. Quality public participation is solicited early and continues throughout the planning process, helping to avoid, minimize, and mitigate negative project impacts while providing the best solutions for the community. Public input is often used in the development of plan or program goals, objectives, criteria, and overall recommendations to the TPO board.

The primary goals of the Bay County TPO PPP are to:

**Inform the Public**
*Inform the public, to the maximum extent possible with available resources, of opportunities to participate in the transportation decision-making process.*

**Involve the Public**
*Involve the public early and often in the transportation planning process.*

**Include the Public**
*Reach out to the geographical, organizational, and demographic communities that compose the TPO study area to increase the public’s opportunity to participate in developing transportation plans and services.*

**Improve the Public Participation Process**
*Continually identify and implement ways to improve the public participation process.*

The PPP is assessed on a quarterly basis to ensure effectiveness as trends and technologies change. All major or minor changes proposed for the plan are reviewed annually and implementation of updates initiate a 45-day review period. Changes to the plan will be posted online. A link to the document with changes will be provided to the TPO board, advisory committees, interested parties, and partners.

The PPP, updated in 2019 based on feedback from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA), is available online or by contacting Public Involvement at 850-332-7976.

Preparation of this document was supported in part with funds provided by FHWA, FTA, Florida Department of Transportation (FDOT), and U.S. Department of Transportation (USDOT) through a cooperative agreement with the Bay County TPO. Development of the plan was made possible by leadership from the Bay County TPO; public comments; and input, review, and discussion provided by the Bay County Technical Coordinating Committee (TCC) and Citizen Advisory Committee (CAC). Special thanks to Carey Shepherd and Danielle Blackshear with FHWA and Carl Mikyska, with the Metropolitan Planning Organization Advisory Council. A complete list of comments will be included in the appendix, to be determined at the close of the 45-day comment period.
For more information about the Bay County TPO, to inquire about membership on the Citizen Advisory Committee, or to learn about ways to get involved, please contact Public Involvement at 850-332-7976.
Ways to get Involved!

Attend a Public Meeting!
At public meetings, you not only have the opportunity to watch the action as the board deliberates and decides on transportation issues in your community, you have the opportunity to make your opinion known. Simply fill out a comment form when you arrive and give it to a staff member. You will be called and the board will hear your thoughts on any of the topics on the agenda, or a topic you wish to bring to their attention.

The TPO meets regularly and the schedule of meetings can be found at ecrc.org/BayTPO

Public Meeting Rules of Civil Accordance
- Respect the right of all members, the public, and staff to hold different opinions
- Avoid rhetoric intended to humiliate, delegitimize, or question the commitment or beliefs of those whose opinions are different from your own
- Strive to understand differing perspectives
- Choose words carefully
- Speak truthfully, without accusation, and avoid distortion
- Speak out against violence, prejudice, and incivility in all forms, whenever and wherever they occur

The Emerald Coast Regional Council further pledges to exhibit and encourage the personal qualities that are emblematic of a civil society: gratitude, humility, openness, passion for service to others, propriety, kindness, caring, faith, sense of duty, and a commitment to doing what is right.

Participate on a Committee!
Community input is vital to the TPO. To acquire meaningful input from engaged community members, the Citizen Advisory Committee (CAC) meets regularly and provides recommendations to the TPO board, giving special attention to the impacts transportation plans and programs may have on their communities. Contact staff to learn about providing input in a non-voting capacity or joining if seats are available.

Complete a Comment Card!
The TPO staff collects public comments continually via comment cards. You do not have to attend a public meeting to complete and submit your comments regarding transportation issues. Ask a public involvement staff member how you can get a hard copy of the comment card, or simply follow this link to make your comment known.
Intent of the Public Participation Plan

The test of successful public participation is the level of early awareness and the quantity, quality, and relevance of feedback received. A process that involves the public in a project’s beginning stages fosters buy-in and better overall acceptance of plans and programs.

The PPP is designed to identify strategies to most effectively gather public input for the Bay County TPO to use throughout the planning process and in the development of transportation plans and programs. Techniques for most effectively reaching the public are subject to ever-changing technologies and trends. The appropriate level of public involvement will vary by product. The minimum requirements for those plans are addressed in the PPP. The PPP also includes methodology for assessing effectiveness.

Bay County TPO Policy on Public Participation

The Code of Federal Regulations (450.316(b)(1)) and the Florida Metropolitan Planning Organization (MPO) Handbook outline public involvement requirements for defining a process for involving the public in the transportation planning process. The Bay County TPO is committed to providing stakeholders with opportunities to provide input for transportation plans and programs. Likewise, the FHWA and FDOT encourage the TPO to solicit public input in all efforts.

It is the policy of the Bay County TPO to:

- Provide complete and easily understood information for all segments of the public, particularly those affected by the outcomes and/or special populations
- Support early and continuous involvement of the public in the development and implementation of transportation plans and programs
- Continually identify and implement ways to improve the public participation process
Federal Requirements for Public Participation

The Fixing America's Surface Transportation (FAST) Act was signed into law on Dec. 4, 2015. The FAST Act authorizes $305 billion over fiscal year (FY) 2016 - 2020 for federal-aid highways, highway and motor vehicle safety, public transportation, motor carrier safety, hazardous materials safety, rail, as well as, research, technology, and statistics programs.

The FAST Act:

▪ Maintains focus on safety (keeping intact the established structure of various highway-related programs)
▪ Continues efforts to streamline project delivery
▪ Provides a dedicated source of federal funds for freight projects

The FAST Act allows, states and local governments to move forward with critical transportation projects with confidence that they will have a federal partner long term. The FAST Act is the first long-term surface transportation authorization enacted in the last 10 years that provides long-term funding certainty. Policies and programs of the FAST Act are administered by FHWA.

The Moving Ahead for Progress in the 21st Century Act (MAP-21), enacted in 2012, included provisions to make federal surface transportation more streamlined, performance-based, multimodal, and to address challenges facing the U.S. transportation system. This includes improving safety, maintaining infrastructure condition, reducing traffic congestion, improving efficiency of the system, freight movement, protecting the environment, and reducing delays in project delivery. The FAST Act builds on changes made by MAP-21.

Setting the course for transportation investment in highways, the FAST Act:

▪ Improves mobility on America’s highways
▪ Creates jobs and supports economic growth
▪ Accelerates project delivery and promotes innovation

These changes will improve innovation and efficiency in the development of projects from the planning and environmental review process, through project delivery.
Achieving the Best Public Participation

Federal and state laws require the transportation planning process to include proactive public participation that provides complete information, timely public notice, and full public access to key decisions.

The Bay County TPO maintains public participation opportunities for transportation plans and programs for impacted communities through a wide range of methods, including but not limited to, board and advisory committees, public meetings and workshops, specialized outreach to community organizations, continuous public comment opportunities, news releases, eblasts, enewsletters, and social media.

Staff works to maintain good relationships with members of the local media to raise awareness of public participation opportunities in transportation planning.

The Bay County TPO holds meetings at locations easily accessible to the geographically diverse urbanized area of Panama City, Fla. All meetings are noticed for the public and promoted through local media with a minimum of seven days’ notice. When possible, public meetings and workshops are held at facilities offering free public parking and accessibility to transit. All public meetings and workshops of the Bay County TPO and its advisory committees are held in Americans with Disabilities Act (ADA)-compliant venues. Locations must be accessible and meet the Florida Building code Chapter 11 accessibility standards of design, per Florida Statute 286.26.

All public notices and media promotion provide the following notice for reasonable accommodations in accordance with the Americans with Disabilities Act:

In compliance with the Americans with Disabilities Act, reasonable accommodations to access meeting, and for limited English proficiency, are available upon request. Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services should contact Public Involvement toll-free 800-226-8914 or TTY 711, at least 48 hours in advance. Para informacion en espanol, puede llamar a Ada Clark al 850-332-7976, ext. 278 o TTY 711. Si necesita acomodaciones especiales, por favor llame 48 horas de antemano.

Participation is solicited without regard to race, color, national origin, age, sex, religion, disability, or family status. Persons who believe they have been discriminated against on these conditions may file a complaint with the Title VI Coordinator, 850-332-7976, ext. 220.

Additionally, the Bay County TPO provides an opportunity for the public to comment at public meetings during public forum. The Bay County TPO recognizes the importance of reaching out to communities through social media tools such as Facebook. Often, they provide an efficient medium to communicate with the public. Incorporation of these media is determined on a case-by-case basis. Comments with abusive language or those deemed off topic may be deleted at the discretion of Bay County TPO staff. For more details about the social media policy, contact Public Involvement at 850-332-7976.
Organizational Structure

History

In 1981, the Panama City Urbanized Metropolitan Planning Organization was created under the authority of Chapter 163 of the Florida Statutes, as a mechanism to conduct a cooperative, comprehensive, and continuing planning process for the transportation needs of the Panama City urbanized area.

Now known as the Bay County Transportation Planning Organization (TPO) it is a governing body consisting of elected officials representing the following local governments: Bay County, Callaway, Lynn Haven, Mexico Beach, Panama City, Panama City Beach, and Parker.

The Bay County TPO now includes the entire county in addition to the urbanized area. Authority is granted under amended 23 USC 134 in Section 1201(a) §134 (F)(2)(a) (Coordination in Multistate Areas). Two advisory committees make recommendations to the TPO board to ensure citizen participation and technical involvement is included in the planning process.
The Bay County TPO is the local, intergovernmental transportation policy board for Bay County, Fla. The board is comprised of local government officials who make decisions regarding transportation at the regional level. The TPO works to increase safety, security, accessibility, mobility, and connectivity for people and goods. Membership of the Bay County TPO board is comprised of elected officials from the following municipalities:

**Bay County TPO Membership:**

5 Bay County Commissioners  
2 City of Callaway Commissioners or Mayor  
2 City of Lynn Commissioners or Mayor  
1 City of Mexico Beach Councilmember  
5 City of Panama City Commissioners or Mayor  
2 City of Panama City Beach Councilmembers or Mayor  
1 City of Parker Councilmembers or Mayor  
1 City of Springfield Councilmembers or Mayor

The TPO board meets, at minimum, six times a year, at 3:30 p.m. on the fourth Wednesday of the meeting month. The meetings are currently held in Panama City, Fla. The TPO meeting schedule can be found online. A print copy of the TPO schedule is available upon request.
Citizen Advisory Committee

The Bay County CAC is comprised of members of the public who express an interest in transportation planning. Prospective members complete an application process and must be recommended for approval by the CAC and ultimately approved by the TPO board. Following approval, members serve at the pleasure of the TPO board. A maximum of 30 voting members may serve on the CAC.

Citizens are welcome to apply directly through the TPO website for membership. General applications will be held for one year and verified for updated information annually.

The CAC application is available online.

The CAC meets, at minimum, six times a year, at 1:30 p.m. on the fourth Wednesday of the meeting month. The meetings are currently held in Panama City, Fla. The TPO meeting schedule can be found online. A print copy of the TPO schedule is available upon request.

Technical Coordinating Committee

The Bay County TCC is comprised of local government technical staff. This committee participates in the planning process by providing technical advice to the TPO board on transportation issues.

The TCC meets, at minimum, six times a year, at 11a.m. on the fourth Wednesday of the meeting month. The meetings are currently held in Panama City, Fla. The TPO meeting schedule can be found online. A print copy of the TPO schedule is available upon request.

Interested Parties

To receive updates from the Bay County TPO, subscribe online for information regarding meetings, plans, programs, or committees. All public meetings and workshops are noticed seven days in advance on the Bay County TPO website calendar, in print publication of largest local circulation, and news release. Bay County TPO board, committee, and other public agendas and schedules can be found online.
Stakeholders

A stakeholder is defined as any person or group that is affected by transportation plans or programs, including those who may not be aware they are affected.

The following groups and individuals are considered stakeholders in the transportation planning process and the audience for various communication tools and outreach efforts:

- Transportation agencies; freight and passenger railroads; logistics providers
- Media
- Homeowners/neighborhood associations
- Civic and advocacy groups
- Business community
- Interested parties expressing an interest in transportation planning
- Area Chambers of Commerce and Economic Development Agencies
- Environmental groups
- Pedestrian and bicycle users
- Special populations and groups
- Large employers
- Boards of education
- Other stakeholders identified by the TPO in outreach efforts

Governments and Agencies

In developing TPO plans and programs, the TPO will consult with governments, agencies and officials responsible for other planning activities within the TPO study area that are affected by transportation (including State and local planned growth, economic development, tourism, natural disaster risk reduction, environmental protection, airport operations, or freight movements) or coordinate its planning process with such planning activities. In addition, the TPO shall develop the transportation plans and TIPs with due consideration of other related planning activities within the metropolitan area. [23 C.F.R. 450.316(a)(3)(b)]

The TPO will to Include appropriate Tribal governments, Federal land management agencies, state and local land use management and environmental agencies including historic preservation in all phases of the TPO plans and programs. Technical staff from such agencies will be encouraged to provide input based on agency plans, mitigation strategies, policies and/or programs. This input may be provided by electronic communication, participation on committees, or one-on-one meetings.

Although there are no public lands and/or Indian Tribal lands in the Florida-Alabama TPO study area, the TPO strives to include tribal governments for insight on planning efforts such as the Long Range Transportation
Public Participation Plan

Plan, Project Priorities, and other products. Generally, correspondence between the TPO and Native American tribes is conducted using electronic communications. The following Native American tribes are included:

- Miccosukee Tribe of Indians of Florida
- Mississippi Band of Choctaw Indians
- Muscogee (Creek) Nation
- Poarch Band of Creek Indians
- Seminole Tribe of Florida

The TPO also corresponds with the Santa Rosa County Creek Indian Tribe, Inc., to ensure this special population is included in the transportation planning process.

**Traditionally Underserved Populations**

Each public participation process provides an opportunity to develop methods to reach traditionally underserved populations, such as minorities and low-income. Potential underserved populations may also include youth, persons with disabilities, and senior citizens.

**Identification of Special Populations**

U.S. Census data is used to identify the Bay County TPO study area demographics which include, race, age, and limited English proficiency communities. Coordinating with agencies throughout the study area that serve special populations aids in the identification of traditionally underserved populations.

Outreach efforts are recorded via interactive map with demographic data and projects, with emphasized attention paid to special populations that may be affected as a result of plans and programs. Mapping this data shows corresponding projects relative to communities that would be most impacted and allows staff to identify populations most affected by the plans and programs. The interactive map, along with U.S. Census demographic data, is utilized to focus outreach efforts in communities of traditionally underserved and limited English proficiency populations. Enhanced outreach methods, such as community pop-up events, can be implemented to involve traditionally hard to reach populations in the transportation planning process. Additionally, the Citizen Advisory Committee ensures all members of the public have every opportunity to be involved in the transportation planning process.

**Environmental Justice**

In 1994, a presidential executive order directed federal agencies to address the effects of all programs, policies, and activities on minority populations and low-income populations.

The Bay County TPO’s environmental justice initiatives accomplish this by adhering to three fundamental principles:

1. To avoid, minimize, or mitigate disproportionately high and adverse health and environmental effects (including social and economic) on minority populations and low-income populations
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations
Properly implemented, environmental justice principles and procedures improve all levels of transportation decision-making. It enhances the public participation process, strengthens community-based partnerships, and provides minority and low-income populations with opportunities to improve the quality of transportation in their lives. Further, environmental justice assists to avoid disproportionately high and adverse impacts on underserved populations and mitigates avoidable negative impacts by identifying concerns early in the planning phases.

Any proposed projects entered into the Efficient Transportation Decision Making (ETDM) environmental screening tool allow for the opportunity to incorporate environmental considerations into transportation planning and engage resource agencies and support the environmental policy of FDOT “to help preserve and enhance Florida’s natural, physical, cultural, and social environment as we develop, implement, and maintain transportation facilities and services” (Policy No.: 000-625-001-l). The ETDM tool provides citizens with the opportunity to direct comments to FDOT, resource agencies, and other stakeholders. The opportunity for early input and consideration of the environment in transportation planning will be included in the LRTP process as needed.

**Title VI, ADA, and LEP**

The Bay County TPO is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color, or national origin. All persons, regardless of their citizenship, are covered under this regulation. In addition, the Bay County TPO prohibits discrimination on the basis of race, color, or national origin in its employment and business opportunities.

As a FTA and FDOT fund recipient, the Bay County TPO will ensure that its programs, policies, and activities comply with both FTA and FDOT Title VI Regulations of the Civil Rights Act of 1964. The Bay County TPO will not condone retaliation against an individual for his/her involvement in asserting his/her rights pursuant to Title VI or because he/she filed a complaint or participated in an investigation under Title VI, and/or these regulations.

The Bay County TPO’s Title VI Policy and Plan outlines policy of inclusivity and procedure for handling complaints of discrimination. The Limited English Proficiency (LEP) Plan, included in the Title VI Policy and Plan, identifies limited English proficient populations in the Bay County TPO study area and provides guidelines to ensure that information and services are accessible to LEP persons. With adequate notice, the TPO provides assistance to citizens who are hearing and visually impaired, of limited English proficiency, transportation disadvantaged, or have other specifically special needs, at all public meetings and workshops. For more details, please review the [Title VI Policy and Plan](#).
Public Participation Goals and Techniques

Goal 1: Inform the Public

*Inform the public, to the maximum extent possible with available resources, of opportunities to participate in the transportation decision-making process.*

Techniques:

- Provide meeting agendas to TPO board and advisory committee members
- Provide adequate public notice by:
  - Posting all public meetings and workshops on the TPO website calendar and community calendars (where available)
  - Sending news releases via email to local media, including special population media outlets
  - Sending meeting notices via email to community groups, organizations, and other stakeholders through the interested contact parties list (interested parties may subscribe online)
  - Placing a public notice in the Federal Administrative Register for review and adoption of core documents and amendments to core products*
- Include the website URL on all TPO meeting and workshop posts and news releases, so that the public can easily access meeting information
- Include provisions in public notices for interested persons to respond by phone or email
- Set up educational displays at public events, including those in traditionally underserved communities
- Speak at local organizations, schools, neighborhoods, and other interested groups about transportation planning
- Give interviews on local TV/radio news programs to educate the public regarding transportation planning issues and the role of residents
- Publish updates in the TPO enewsletter to inform the public of the TPO’s accomplishments and to solicit public participation
- Make all information available at Emerald Coast Regional Council or by mail for interested parties with no computer access
- Schedule pop-up events in various communities to reach broader demographic of the study area
- Implement virtual workshops and etown halls whenever possible to allow remote engagement in the transportation process
- Host nontraditional outreach and workshops to garner input from special populations
- Utilize social media, when appropriate, to promote participation opportunities, workshops, and meetings

*Core products include:* Unified Planning Work Program (UPWP), Long Range Transportation Plan (LRTP), five-year Transportation Improvement Program (TIP), Congestion Management Process (CMP), and Public Participation Plan (PPP).
**Emergency Meetings**

The TPO or advisory committee Chairman may call for an emergency meeting of their respective board or committee when, in their opinion, an emergency exists which requires immediate action. When such meetings are called, each member shall be notified of the meeting date, time, location, and purpose. No business, other than the notified purpose, shall be addressed at that meeting.

If after reasonable diligence, it becomes impossible to give notice to each member, such failure shall not affect the legality of the emergency meeting if a quorum is present. The minutes of each emergency meeting shall show the manner and method by which notice of such meeting was given to each member of the TPO.

Emergency meetings should be scheduled to allow seven day public notice, whenever possible, and will be noticed as described above. In the event seven days public notice is not possible, at least a 24-hour advance public notice of the emergency meeting shall be given to local media services before the time the meeting is held.

**Special Meetings**

A special meeting may be called by the TPO or advisory committee Chairman or a majority of the voting members at a regular meeting. When such meetings are called, each member shall be notified of the meeting date, time, location, and purpose. No business, other than the notified purpose, shall be addressed at that meeting.

In the event that the Chairman wishes to cancel or change the time of a special meeting, advance notice of such cancellation or change shall be made as soon as practicable or at least 24 hours prior to when such meeting was to have taken place.

Special meetings should be scheduled to allow seven day public notice, whenever possible, and will be noticed as described above.

**Goal 2: Involve the Public**

*Involve the public early and often in the transportation planning process.*

**Techniques:**

- Maintain active advisory committees allowing residents the opportunity to participate in the continuous planning process
- Review CAC composition to ensure that equitable representation is maintained for the region
- Include a feature on the TPO’s website allowing the public to email staff with questions or comments
- Create surveys, when appropriate to be administered at TPO meetings, workshops, events, etc.
- Ensure all digital comments are responded to by forwarding to the appropriate member of the transportation planning team
- Inform TPO board members of recommendations from the CAC and TCC
- Allocate time for public comment on the TPO board and committees’ agenda

**Goal 3: Include the Public**

*Reach out to the geographical, organizational, and demographic communities of the TPO study area to increase the public’s opportunity to participate in developing transportation plans and services.*
Techniques:

▪ Participate in community outreach events, maintaining a focus to include traditionally underserved communities
▪ Take advantage of training opportunities and learn from the experiences of other TPOs
▪ Learn about the communities that comprise the TPO area by attending festivals, special events, lectures, etc. that highlight the diversity of the area
▪ Continually add interested parties to email database
▪ Coordinate with local government redevelopment agencies and non-profit agencies that serve special populations
▪ Include in TPO public notices that upon request, with adequate notice, assistance will be provided to the hearing and visually impaired, those with limited English proficiency, the transportation disadvantaged, and others requiring specific special assistance

Goal 4: Improve the Public Participation Process
Continually identify and implement ways to improve the public participation process.

Techniques:

▪ Identify opportunities to improve and create innovative strategies that will reach greater and more diverse populations in the study area
▪ Conduct quarterly assessments of public participation techniques and adjust strategies as needed to improve effectiveness and reach set performance measure targets
▪ Utilize web-based analytics tools to track the performance of online public outreach strategies
▪ Continue expansion of regional interagency coordination of public participation activities, particularly when projects may directly involve residents from adjacent counties
Methods for Achieving Good Public Involvement

Public Meetings

1. A summary of questions and comments to be discussed at quarterly assessment
2. Provide adequate public notice by:
   a. Posting all public meetings and workshops on the TPO website calendar and community calendars (where available)**
   b. Sending news releases via email to local media, including special population media outlets**
   c. Sending meeting notices via email to community groups, organizations, and other stakeholders through the interested contact parties list (interested parties may subscribe online)**
   d. Placing a public notice in the Federal Administrative Register for review and adoption of core documents and amendments to core products *

*Core products include:* Unified Planning Work Program (UPWP), Long Range Transportation Plan (LRTP), five-year Transportation Improvement Program (TIP), Congestion Management Process (CMP), and Public Participation Plan (PPP).

** Includes: In compliance with the Americans with Disabilities Act, reasonable accommodations to access meeting, and for limited English proficiency, are available upon request. Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services should contact Public Involvement toll-free at 800-226-8914 or TTY 711, at least 48 hours in advance. Para informacion en espanol, puede llamar a Ada Clark al 850-332-7976, ext. 278 o TTY 711. Si necesita acomodaciones especiales, por favor llame 48 horas de antemanos.

Participation is solicited without regard to race, color, national origin, age, sex, religion, disability, or family status. Persons who believe they have been discriminated against on these conditions may file a complaint with the Title VI Coordinator, 850-332-7976, ext. 220.

Public Workshops

Same steps as public meetings (above) and may also include:

1. Newsletter article in transportation enewsletter (subscribe online)
2. Print collateral mailed to residents/property owners/business owners within project area of interest
3. Social media promotion of the opportunity
4. Tailored activities and presentations to include flip charts, maps, surveys, and/or handouts as needed

Virtual Workshops/eTown Halls

Can be held independent of, or in coordination with, a standing public workshop or meeting. Same steps as public meetings (above) and may also include:

1. Live Q & A session
2. Live streaming of presentations
3. Social media promotion of the opportunity
Nontraditional Outreach/Workshops

Same steps as public meetings (above) and may also include:

1. Social media promotion of the opportunity
2. Tailored activities and collateral to include flip charts, maps, surveys, and/or handouts as needed

Civic Outreach

1. Eblasts to TPO board and advisory committees, partners, stakeholders, community groups, and interested parties (subscribe online)
2. Tailored activities and presentations to include flip charts, maps, surveys, and/or handouts as needed

Community/Pop-Up Events

1. Eblasts to TPO board and advisory committees, partners, stakeholders, community groups, and interested parties (subscribe online)
2. Interactive booths with project specific information collateral
3. Post event details on the TPO website calendar
4. Send news releases via email to local media, including special population media outlets
5. Social media promotion of the opportunity

Networking Events

1. Tailored collateral to include handouts as needed

Educational Institution Outreach

1. Simplified and tailored activities and collateral to include flip charts, maps, surveys, and/or handouts
2. Educational activities, such as StreetMix, will be used to educate students on the transportation planning process

Outreach activities will be assessed on a quarterly basis to evaluate their effectiveness and make improvements as needed. More details of the quarterly assessment process can be found on page 31.
TPO Work Plans and Programs

The Bay County TPO continuously develops and updates several plans and programs. In exercising its authority to guide the expenditure of federal and state transportation funds, it is critical for the PPP to provide complete information and timely public notice, and to support continuing involvement of the public in the development of plans and programs. The Bay County TPO operates on an annual cycle with a fiscal year of July 1 through June 30. The following infographics, provided by FDOT, describe the relationship between the TPO and their planning documents:
The TPOs develop their LRTP to implement national and state goals for their metropolitan area. Projects are developed and must be included in the LRTP to be considered for funding. The LOPP is used to inform the development of the TIP, which must be consistent with the LRTP. The projects included in the TIP are funded and completed through the Work Program (WP). The UPWP describes what planning work the MPO will do, when it will be completed, how much it will cost, and how it will be paid for.

The FTP is a long-term plan that sets goals to guide transportation decisions to meet the needs of Florida. The next 10 years of funding for programs are identified in the P&RP. All 27 TIPs are combined together, along with FDOTs other non-metropolitan statewide projects, to form the STIP. To be eligible for federal funding, projects must be included in the LRTP, TIP, and STIP. Projects are funded and completed through the Work Program (WP).

**Long Range Transportation Plan**

The Long Range Transportation Plan (LRTP) is a federally required plan, updated every five years, that addresses future transportation needs for a minimum of twenty years. The LRTP, a major product of the TPO, details a variety of tasks to be accomplished during the on a 21-month update process, including the tasks outlined in the following infographic:
Long Range Transportation Plan TASKS

**SCOPE OF SERVICES**
An agreement between ALDOT, FDOT, the TPO, and consultants outlining the scope of the LRTP process, tasks to be completed through the process, and a general timeline of the process.

**How to be Involved**
Review the scope of work prior to adoption by the TPO. Sign up for agenda distribution list to receive updates and notifications.

**CONGESTION MANAGEMENT PROCESS**
The Congestion Management Process is a state and federally mandated document designed to support the transportation planning process formulating safety recommendations through the collection of annual data.

**How to be Involved**
Sign up for agenda distribution list to receive updates and notifications.

**GOALS AND OBJECTIVES**
The goals, objectives, and policies adopted at the out-set of the LRTP update will guide the study and will play a critical role in project ranking and systems evaluation. Performance measures and targets will be used in accordance with the required performance management approach.

**How to be Involved**
Attend the Public Workshop scheduled for the community to review and provide input.

**EVALUATION CRITERIA**
To ensure that the projects in the Needs Plan are evaluated with a common set of criteria, a series of evaluation criteria will be developed that reflect the Goals, Objectives, Policies, and Performance Measures.

**How to be Involved**
Review the scope of work prior to adoption by the TPO. Sign up for agenda distribution list to receive updates and notifications.

**NEEDS PLAN DEVELOPMENT**
The development of the Year 2045 Needs Plan as well as Purpose and Needs Statements for each project in the 2045 Needs Plan, considering how the existing and proposed transportation facilities will function as an integrated, multimodal system.

**How to be Involved**
Attend the Public Workshop scheduled for the community to review and provide input.

**DOCUMENTATION**
Elements of this task provide for the development of the Year 2045 Cost Feasible Plan, Cost and Year of Expenditure will be developed.

**How to be Involved**
Sign up for agenda distribution list to receive notifications of the published documents made available for public review by the TPO.

**FINANCIAL RESOURCES**
This task will produce information regarding existing and projected funding sources to be used in developing the Year 2045 Cost Feasible Plan.

**How to be Involved**
This activity is data collection only.

**COST FEASIBLE PLAN DEVELOPMENT**
Elements of this task provide for the development of the Year 2045 Cost Feasible Plan, Cost and Year of Expenditure will be developed.

**How to be Involved**
Attend the Public Workshop scheduled for the community to review and provide input.
Public involvement strategies for each LRTP update should include a variety of outreach activities designed to solicit feedback, which aid in the development of LRTP goals, objectives, evaluation criteria, and the final plan. Public involvement strategies should be implemented in all stages of the process to garner input from stakeholders of all ages, communities, and interests, and must subscribe to the following explicit procedures, strategies, and desired outcomes, as outlined by the Code of Federal Regulation (CFR 450.316) and the MPO Handbook.

These strategies are as listed:

- Provide reasonable public access to technical and policy information used in the development of the LRTP on the website and at the TPO office at West Florida Regional Planning Council
- Provide adequate public notice of public involvement activities and time for public review and comment at key decisions, such as but not limited to the approval of the LRTP
- Demonstrate explicit consideration and response to public input received during plan development process
- Employ visualization techniques to describe the LRTP
- Make the LRTP and any associated information available on the TPO website
- Hold public meetings at convenient times and accessible locations
- Seek out and consider the needs of those traditionally underserved by existing transportation systems, including but not limited to, low-income and minority households
- Coordinate with the statewide transportation planning public involvement and consultation processes under 23 C.F.R. Subpart B
- Periodically review the effectiveness of the procedures and strategies contained in the participation plan
- When significant written and oral comments are received on a draft LRTP (including the financial plan) as a result of public involvement, a summary, analysis, and report on the disposition of comments shall be made part of the final LRTP
- If the final LRTP differs significantly from the one made available for public comment or raises new material issues, an additional opportunity for public comment must be made available
General techniques for LRTP Update:

- Review the previous major update process public participation report, quarterly assessment reports, etc.
- Research and review similar public involvement plans, new methods, and trends for community outreach
- Develop a slogan, message, and design collateral
- Develop public participation timeline that outlines specific milestones for engaging the public
- Develop list of partners, stakeholders, and community groups to engage in the update process
- Develop and distribute of E-Blasts
- Strategic use of traditional and social media
- Develop effective visual aids such as maps, charts, and graphs
- Develop surveys and comments cards
- Coordinate presentations at regular local government and community organizations’ meetings
- Coordinate focused outreach to engage special populations
- Coordinate Steering Committee meetings
- Coordinate public workshops at key points in the development of the long range transportation plan
- Develop Public Involvement Report to document all aspects of the public involvement efforts during the development of the plan update
- Include in public notice of the TPO board meeting when draft LRTP is to be presented for review and adoption

Any proposed project entered into FDOT’s ETDM environmental screening tool provides stakeholders the opportunity for public comment.
Strategies used by the TPO may include, but are not limited to:

**Outreach**
- Identification of stakeholders, organizations, special populations, tribal organizations, and media outlets
- News releases/articles
- Radio/TV interviews
- Public Notices
- Creation and distribution of surveys, as deemed necessary
- Public open houses, workshops, and forums
- Presentations to specific groups
- Comment cards
- Use of GIS maps
- Visualization techniques, such as educational videos, maps, interactive activities, renderings, etc.

**Awareness/Education**
- Enewsletters
- Email marketing
- Social media
- Dedicated section on the TPO website

**Documentation**
- Compilation of comments
- Photos of outreach activities
- Oral and written comments to be posted to the website along with drafts
- Documentation of outreach opportunity assessment*
*More details of the quarterly assessment process can be found on page 31.
Project Priorities and Transportation Improvement Program

The Project Priorities result from the LRTP’s Cost Feasible Plan and are reviewed with the public and the TPO board and advisory committees annually. Once adopted by the TPO board, the Project Priorities are given to FDOT to develop the Five-Year Work Program. From the Five-Year Work Program, the TPO develops the Transportation Improvement Program (TIP), which contains all transportation programs and projects scheduled during the next five-year cycle. The TIP is revised annually and is available, in interactive format, on the TPO’s website.
The Project Priorities and TIP must be developed by the TPO in consultation with all interested parties and, at a minimum, describe explicit procedures, strategies, and desired outcomes for the following, as outlined by the Code of Federal Regulation (CFR 450.316) and the MPO Handbook:

- Provide reasonable public access to technical and policy information used
- Provide adequate public notice of public involvement activities and time for public review and comment at key decisions, such as but not limited to the approval of the TIP/Project Priorities
- Demonstrate explicit consideration and response to public input received during plan development process
- Make the TIP and Project Priorities drafts and final documents available on the TPO website
- Hold public meetings at convenient times and accessible locations
- Seek out and consider the needs of those traditionally underserved by existing transportation systems, including but not limited to, low-income and minority households
- Coordinate with the statewide transportation planning public involvement and consultation processes under 23 C.F.R. Subpart B, as described in the FDOT MPO Program Management Handbook
- Periodically review the effectiveness of the procedures and strategies contained in the participation plan
- When significant written and oral comments are received on a draft TIP or Project Priorities as a result of public involvement, a summary, analysis, and report on the disposition of comments shall be made part of the final documents
- If the final Project Priorities/TIP differ significantly from the one made available for public comment or raises new material issues, an additional opportunity for public comment must be made available
- When the Metropolitan Planning Area (MPA) includes Indian tribal lands, the TPO shall appropriately involve the Indian tribal government(s)
- When the MPA includes federal public lands, the TPO shall appropriately involve the federal government

General techniques proven effective include:

- Provide a 30-day public review and comment period for the draft Project Priorities documents
- Promote development of the Project Priorities and TIP through news releases and social media, and eblast to TPO board and advisory committees, partners, stakeholders, community groups, and interested parties (subscribe online)
- Hold public workshop(s) and implement additional project-specific outreach, as needed, to special populations during the Project Priorities process
- Coordinate public outreach to community groups (with emphasis on the underserved)
- Include public input collected at workshops in the draft Project Priorities and TIP
- Include in the public notice of the TPO board meeting when the draft Project Priorities and TIP are to be presented for review and adoption
- Provide the public with an opportunity to comment during public forum when the draft Project Priorities and TIP are presented for review and adoption to the TPO board and advisory committee meetings
- Publish adopted Project Priorities and TIP interactive site (provided by FDOT) on website

As previously described with the LRTP, any proposed project entered into the FDOT’s ETDM environmental screening tool provides stakeholders the opportunity for public comment.

**Unified Planning Work Program**

The Unified Planning Work Program (UPWP) is the document that details the tasks assigned to the TPO staff and the projected funding to cover those tasks within the fiscal year. The plan covers a two-year period but is revised annually to refine task descriptions and reflect changes necessary within the forecasted financial
management schedule. The UPWP must be made available for comment to the public, federal agencies, and interested parties.

Below are some of the steps utilized to update and revise the UPWP:

- Provide a 30-day public review and comment period for the draft UPWP
- Include in the public notice of the TPO board meeting when draft is to be presented for review and adoption
- Provide the public with an opportunity to comment during public forum when the draft is presented for review and adoption
- Publish adopted document on website

**Administrative Modifications**

Administrative modifications to the PPP, LRTP, TIP, or UPWP are minor revisions and do not require public review but must be included in the public notice for the TPO board meeting when the modification is presented for review and adoption.

**Amendments**

Amendments are revisions that may involve the addition or deletion of a major project, a major change in project cost, or a major change in design concept or design scope. Amendments require a formal public review and comment period.

A 30-day formal comment period will be implemented for major LRTP amendments and the public participation procedures may vary based on the nature of the amendment. TPO board staff, with TPO board consultation, will make this determination based on the project, the nature of the change, the number of counties affected, and the impact on the planning process. Because of the wide variability in what an amendment can include, the TPO reserves the right to determine what participation techniques are appropriate, recognizing that outreach measures should fit the amendment content. At all times, the public, interested parties, policy makers, and partners are able to obtain the full extent of information about each project change. Review and adoption of amendments to core documents, by the TPO board, will be noticed in the Florida Administrative Register.

Below are some of the steps utilized for amendments to major documents or plans:

- Provide a 30-day public review and comment period for the draft document or plan
- Include in the public notice of the TPO board meeting when the draft document or plan is to be presented for review and adoption
- Provide the public with an opportunity to comment during public forum when the draft document or plan is presented for review and adoption
- Publish adopted document on website

**Additional TPO Projects and Plans**

Public involvement strategies and techniques vary widely depending on the depth and detail of a project or plan. Examples include the Congestion Management Process, Pedestrian-Bicycle Plan, Regional Freight Plan, and Corridor Management Plans. Project specific public participation elements will be included early in the planning process.
The Bay County TPO’s typical public participation elements may include:

- Provide a 30-day public review and comment period for the draft document or plan
- Include in the public notice of the TPO board meeting when the draft document or plan is to be presented for review and adoption
- Provide the public with an opportunity to comment during public forum when the draft document or plan is presented for review and adoption
- Publish adopted document on website

<table>
<thead>
<tr>
<th>Public Participation Opportunities</th>
<th>Public Comment Period</th>
<th>Public Notice</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation Planning Organization Board</td>
<td>Every meeting</td>
<td>Seven days prior to meeting</td>
<td>Meets at least six times per year</td>
</tr>
<tr>
<td>Citizen Advisory Committee</td>
<td>Every meeting</td>
<td>Seven days prior to meeting</td>
<td>Meets at least six times per year</td>
</tr>
<tr>
<td>Technical Coordinating Committee</td>
<td>Every meeting</td>
<td>Seven days prior to meeting</td>
<td>Meets at least six times per year</td>
</tr>
<tr>
<td>Freight Advisory Working Group</td>
<td>Every meeting</td>
<td>Seven days prior to meeting</td>
<td>Meets on an as needed basis</td>
</tr>
<tr>
<td>Public Access</td>
<td></td>
<td><a href="http://www.ecrc.org">www.ecrc.org</a></td>
<td></td>
</tr>
<tr>
<td>Program Adoption and Amendment Timeline</td>
<td>Unified Planning Work Program (UPWP)</td>
<td>Long Range Transportation Plan (LRTP)</td>
<td>Transportation Improvement Program (TIP)</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>--------------------------------------</td>
<td>--------------------------------------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>Program Update Schedule</td>
<td>Every 2 years</td>
<td>Every 5 years</td>
<td>Every year</td>
</tr>
<tr>
<td>Adoption Public Comment Period</td>
<td>30 days prior to TPO board adoption</td>
<td>14 days prior to TPO board adoption</td>
<td>30 days prior to TPO board adoption</td>
</tr>
<tr>
<td>Adoption Public Notice Period</td>
<td>7 days prior to TPO board review and adoption</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Amendments Schedule</td>
<td>As needed</td>
<td>N/A</td>
<td>Annual</td>
</tr>
<tr>
<td>Amendments Public Comment Period</td>
<td>7 days prior to TPO board review and adoption</td>
<td>N/A</td>
<td>45 days prior to TPO board adoption</td>
</tr>
<tr>
<td>Amendment Adoption and Review Public Notice Period</td>
<td></td>
<td>7 days public notice</td>
<td></td>
</tr>
<tr>
<td>Public Access to Document</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Assessment of Public Participation Strategies

The Bay County TPO staff must assess the effectiveness of public participation strategies to ensure that funds and time are well invested, and public participation goals are achieved. It is standard practice that all TPO plans and programs require an evaluation of public outreach activities on a quarterly basis. If the assessment reveals that the public participation goals are not being achieved, the techniques may be modified or changed. Quarterly assessment meetings are held internally for transportation and other program staff to assess all outreach opportunities and plan or program specific goals. The assessment meetings give staff an opportunity to develop, evaluate, and modify goals.

Evaluation Tools

Several evaluation tools will be utilized to track metrics of public participation efforts. The Public Outreach Evaluation Form will be utilized to record qualitative and quantitative data. Public Outreach Evaluation Forms will be recorded and assessed quarterly. The Interactive Outreach Map will be updated quarterly with the plotting of outreach efforts. The map will be used in the assessment of areas in need of outreach and environmental justice impacts of the TPO’s plans and programs. The Interactive Outreach Map will develop a baseline for outreach efforts and aid in the development of public participation goals. The map is available online. Questionnaires, distributed to participants at meetings, via the web or by mail, is the final evaluation tool that will be utilized in tracking metrics.

Evaluation Metrics

The Bay County TPO’s public participation activities can be evaluated through numerous methods. Currently, the TPO tracks the following metrics:

- Number and quality of outreach opportunities
- Estimated reach and attendance of outreach opportunity
- Number of social media followers and posts
- Number of enewsletter subscribers and enewsletters/email blasts
- Number of news release subscribers (media as well as groups and organizations) and number of news releases distributed
- Number of attendees at public workshops
- Number and geographic distribution of CAC members
- Number of completed surveys and/or comments

Performance Measures

Performance measures are used in defining and monitoring objective indicators to assess and report the performance of public involvement efforts. The performance methodology, for public participation, aids in the identification of appropriate goals and objectives that could provide an effective framework for assessing and reaching public participation goals.

The following performance measures focus on desired outcomes and advance strategic objectives:
**Equity** - Provide equitable access to transportation decision-making.

*Indicator E-1:* Access to information and participation opportunities by persons with disabilities

**Target:** [100%] of disabled persons that requested accommodations were satisfied with efforts made to accommodate their needs

**Target:** [100%] of meetings, events and project-related information sources are accessible to persons with disabilities

**Data and Measurement:** This information will be tracked by noting the number of requests received for special accommodations for each meeting location or related to project information and the number of events (meetings, hearings, workshops) involving a public notice by the agency that provided special accommodations during a given year. A survey or comment form will be provided to those who required accommodation to assess their satisfaction with agency accommodations. Meetings, events and project-related information source accessibility to persons with disabilities, will be recorded on the Public Involvement Evaluation Form.

*Indicator E-2:* Convenience of meetings and events to public transportation, where available

**Target:** [60%] of public involvement events are within [1/8 mile] of a transit stop.

**Data and Measurement:** This information will be tracked by noting the number of meetings held within 1/8 mile of a transit stop for meetings and events that are held in areas that have public transit.

*Indicator E-3:* Geographic dispersion of involvement opportunities

**Target:** At least one meeting or opportunity is located in each affected neighborhood within the study area.

**Data and Measurement:** This information will be tracked using the Interactive Outreach Map

*Note:* this target pertains to corridor or area specific projects or actions.

**Target:** At least one meeting or opportunity is located in each county with the TPO study area.

*Indicator E-4:* Convenience of meeting or event time

**Target:** At least [75%] of participants and invitees felt the meeting or event was held at a convenient time.

**Data and Measurement:** This information will be tracked using responses to questionnaires that are administered at the meeting or distributed via the web or by mail.

*Indicator E-5:* Convenience of meeting or event location

**Target:** At least [75%] of participants and invitees felt the meeting or event was held at a convenient location.

**Data and Measurement:** This information will be tracked using responses to questionnaires that are administered at the meeting or distributed via the web or by mail.

**Method** - Use a variety of methods to involve and engage the public.

*Indicator M-1:* Perception of the value of methods used (e.g., public meeting, one-on-one meeting, agency presentation, online, mailings, other.)
**Target:** [60%] of participants agree [insert technique*] was of value in capturing their input.

**Target:** [60%] of participants agree [insert technique*] was of value in conveying project information.

**Target:** [60%] of project managers agree [insert technique*] was of value in capturing public input.

**Target:** [60%] of project managers agree [insert technique*] was of value in conveying project information.

*Techniques will be determined based on outreach activity, project, and outreach audience.

**Data and Measurement**: This information will be tracked using responses to questionnaires that are distributed to participants at meetings, via the web or by mail.
## List of Acronyms

<table>
<thead>
<tr>
<th>Term</th>
<th>Acronym</th>
</tr>
</thead>
<tbody>
<tr>
<td>Americans with Disabilities Act</td>
<td>ADA</td>
</tr>
<tr>
<td>Citizens Advisory Committee</td>
<td>CAC</td>
</tr>
<tr>
<td>Efficient Transportation Decision Making</td>
<td>ETDM</td>
</tr>
<tr>
<td>Federal Highway Administration</td>
<td>FHWA</td>
</tr>
<tr>
<td>Federal Transit Administration</td>
<td>FTA</td>
</tr>
<tr>
<td>Florida Department of Transportation</td>
<td>FDOT</td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>LEP</td>
</tr>
<tr>
<td>Long Range Transportation Plan</td>
<td>LRTP</td>
</tr>
<tr>
<td>Metropolitan Planning Area</td>
<td>MPA</td>
</tr>
<tr>
<td>Metropolitan Planning Organization</td>
<td>MRPO</td>
</tr>
<tr>
<td>Moving Ahead for Progress in the 21st Century</td>
<td>MAP-21</td>
</tr>
<tr>
<td>Public Participation Plan</td>
<td>PPP</td>
</tr>
<tr>
<td>Technical Coordinating Committee</td>
<td>TCC</td>
</tr>
<tr>
<td>Transportation Improvement Program</td>
<td>TIP</td>
</tr>
<tr>
<td>Transportation Management Area</td>
<td>TMA</td>
</tr>
<tr>
<td>Transportation Planning Organization</td>
<td>TPO</td>
</tr>
<tr>
<td>Unified Planning Work Program</td>
<td>UPWP</td>
</tr>
</tbody>
</table>
## Public Involvement Evaluation

<table>
<thead>
<tr>
<th>Activity:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Location:</td>
<td></td>
</tr>
<tr>
<td>Intended Audience:</td>
<td></td>
</tr>
<tr>
<td>Estimated Reach:</td>
<td></td>
</tr>
<tr>
<td>Activity Attendance:</td>
<td></td>
</tr>
<tr>
<td>Project/Program Promoted:</td>
<td></td>
</tr>
<tr>
<td>Description of Activity:</td>
<td></td>
</tr>
<tr>
<td>Materials/Tools Used:</td>
<td></td>
</tr>
<tr>
<td>Results:</td>
<td></td>
</tr>
<tr>
<td>Overall Assessment:</td>
<td></td>
</tr>
<tr>
<td>Recommendations:</td>
<td></td>
</tr>
</tbody>
</table>
## Appendix III

<table>
<thead>
<tr>
<th>Comment</th>
<th>Submitted by</th>
<th>Solution/Adjustment</th>
</tr>
</thead>
<tbody>
<tr>
<td>In the core document schedule table Update TIP adoption public commit period to 14 days prior to board adoption, instead of 30 days, as outlined in the FDOT MPO Program Management Handbook.</td>
<td>Gary Kramer</td>
<td>Staff made the change requested for the table.</td>
</tr>
<tr>
<td>Consider adding performance measures and set goals of 100% for mandates (i.e. ADA). The TPO is not explicitly required in federal or state law to place legal line advertisements for public notice. The TPO can write into the PPP Document where notices are sent. The TPO must document everything within resource availability is done (other than legal notice), such as sending press releases to small newspapers/radio stations that represent underserved populations.</td>
<td>Rusty Ennenmoser, PhD, State Public Involvement and Community Resource Coordinator, Florida Department of Transportation</td>
<td>Staff added performance measures to evaluate equity and methods of public involvement efforts. Please find the performance measures on page 31 and 32 of the plan.</td>
</tr>
<tr>
<td>We couldn’t identify a section that provide detail procedures for ‘unplanned’ or ‘short notice’ meetings. What is the TPO process for these type of meetings, if there are any?</td>
<td>Luis D. López-Rivera, P.E. Senior Environmental Specialist and Interim Planning Program Manager U.S. Department of Transportation</td>
<td>Unplanned or Short Notice meetings are addressed as Emergency or special meetings on page 16.</td>
</tr>
<tr>
<td>The Plan doesn’t outline roles, responsibilities, and key decision points for consulting with other governments and agencies. Does the TPO has a process in place for these consultations?</td>
<td>Luis D. López-Rivera, P.E. Senior Environmental Specialist and Interim Planning Program Manager U.S. Department of Transportation</td>
<td>The plan outlines the roles, responsibilities, and key decision points for consulting with other governments throughout the plan, but this comment is specifically addressed by the addition of Governments and Agencies section on page 12.</td>
</tr>
<tr>
<td>Does the TPO has Federal public lands and/or Indian Tribal lands in the region? If yes, were the management agencies and Indian Tribe governments involved in the development of the MTP and TIP?</td>
<td>Luis D. López-Rivera, P.E. Senior Environmental Specialist and Interim Planning Program Manager U.S. Department of Transportation</td>
<td>Tribal governments and Indian Tribal lands on page 12. The TPO area does not include any Tribal Governments or Indian Lands, but Native American organizations and Tribal Governments outside the TPO area are consulted through the PPP.</td>
</tr>
<tr>
<td>The entire document will be placed online and is designed for someone accessing it ‘online’. My concern, if a person is reading a printed/hard copy, they will encounter several links in the document that state, “can be found online”, “can be found on this website”, and “is available online” – none of the links are spelled out. How will that person access the links that are referenced.</td>
<td>Donna M. Green, Planning Specialist Florida Department of Transportation – District Three</td>
<td>All links are ECRC.org, documents mentioned in the PPP will be included in the appendix, with the exception of working or “living” documents such as Project Priorities, LRTP, etc. These documents are available upon request. To ensure that the reader receives the most recently adopted or drafted plan the PPP will clearly state that print copies are available upon request for each document referenced.</td>
</tr>
<tr>
<td>Page 2. The TPO’s contact information is listed and Kathy’s name is posted as a contact. As a professional stand-alone document, shouldn’t the Executive Director (or the leadership team) be listed and the council’s telephone number. I see the address and Kathy’s name as a contact for the document.</td>
<td>Donna M. Green, Planning Specialist Florida Department of Transportation – District Three</td>
<td>Kathy was the Public Involvement Manager, which is the leadership team. Due to the new vacancy of that position general contact information is provided. Readers with questions regarding the PPP should contact public involvement staff. The agency phone number was also added.</td>
</tr>
</tbody>
</table>
TITLE VI NON-DISCRIMINATION PLAN
INCLUDING LIMITED ENGLISH PROFICIENCY (LEP)
BAY COUNTY PUBLIC TRANSIT SYSTEM

PREPARED BY: BAY COUNTY BOARD OF COUNTY COMMISSIONERS:
TRANSIT DEPARTMENT
1021 Massalina Drive Panama City, Florida 32401
## PLAN REVISIONS

<table>
<thead>
<tr>
<th>Date</th>
<th>Area of Revision</th>
<th>Concerned Person (Signature)</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/13/14</td>
<td>Plan Adopted by Bay County TPO</td>
<td>Bay County TPO Board</td>
<td>Resolution Bay 14-36</td>
</tr>
<tr>
<td>4/1/18</td>
<td>3 Year Plan Update</td>
<td>Lamar Hobbs</td>
<td></td>
</tr>
<tr>
<td>1/7/19</td>
<td>Plan Review</td>
<td>Lamar Hobbs</td>
<td></td>
</tr>
<tr>
<td>3/8/19</td>
<td>Section 8 Section 10 (A) &amp; (B)</td>
<td>Lamar Hobbs</td>
<td>Updates requested by FDOT as part of Triennial Review</td>
</tr>
<tr>
<td>7/24/19</td>
<td>Section 2 (C)</td>
<td>Bay County TPO Board</td>
<td>Resolution Bay 19-</td>
</tr>
</tbody>
</table>
# TABLE OF CONTENTS

1. TITLE VI/NON-DISCRIMINATION POLICY STATEMENT .......................................................... 6

2. INTRODUCTION AND DESCRIPTION OF SERVICES ...................................................... 8
   1. FIRST TIME APPLICANTS .............................................................................................. 8
   2. ANNUAL CERTIFICATIONS AND ASSURANCES .......................................................... 9
   3. TITLE VI PLAN ADOPTION .......................................................................................... 9

3. TITLE VI NOTICE TO THE PUBLIC ................................................................................ 10
   A. NOTICE TO PUBLIC ................................................................................................... 10
   B. NOTICE POSTING LOCATIONS ................................................................................ 10

4. TITLE VI PROCEDURES AND COMPLIANCE ................................................................ 11
   A. COMPLAINT PROCEDURE ....................................................................................... 11
   B. COMPLAINT FORM .................................................................................................... 12
   C. RECORDS RETENTION AND REPORTING POLICY .................................................... 12
   D. SUB-RECIPIENT ASSISTANCE AND MONITORING ............................................... 12
   E. CONTRACTORS AND SUBCONTRACTORS .................................................................. 13

5. TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS ...................................... 16

6. PUBLIC PARTICIPATION PLAN ....................................................................................... 18

7. LANGUAGE ASSISTANCE PLAN .................................................................................... 20

8. TRANSIT PLANNING AND ADVISORY BODIES ............................................................. 21

9. TITLE VI EQUITY ANALYSIS .......................................................................................... 23

10. SYSTEM-WIDE SERVICE STANDARDS AND SERVICE POLICIES ............................ 25
    A. SERVICE STANDARDS .............................................................................................. 25
    B. SERVICE POLICIES .................................................................................................. 26

11. ATTACHMENTS ................................................................................................................ 28
A. FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS .......... 29
B. CURRENT SYSTEM DESCRIPTION .............................................................................. 32
C. TITLE VI PLAN ADOPTION .......................................................................................... 39
D. FTA CONCURRENCE ................................................................................................. 41
E. TITLE VI NOTICE TO PUBLIC .................................................................................. 44
F. TITLE VI COMPLAINT FORM ................................................................................... 47
G. PUBLIC PARTICIPATION PLAN ................................................................................ 52
H. LANGUAGE ASSISTANCE PLAN .............................................................................. 57
I. OPERATING AREA LANGUAGE DATA ...................................................................... 66
1. TITLE VI/NON-DISCRIMINATION POLICY STATEMENT

Section 21.7(a) of 49 CFR: Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to 49 CFR Part 21.

The Bay County Public Transit System is committed to ensuring that no person shall, on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

The Bay County Public Transit System further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.

2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in languages other than English.

3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.

4. Develop a complaint process and attempt to resolve complaints of discrimination against the Bay County Public Transit System.

5. Participate in training offered on the Title VI and other nondiscrimination requirements.

6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.

7. Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.

8. Submit the information required by FTA Circular 4702.1B to the primary recipients. A copy of FTA Circular 4702.1B Reporting Requirements for Transit Providers is included in Attachment A.
THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Respectfully,

Angela L. Bradley
Transit System Program Administrator,
Bay County Public Transit System
2. INTRODUCTION AND DESCRIPTION OF SERVICES

The Bay County Public Transit System submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

The Bay County Public Transit System is a direct recipient of FTA funds and provides service in the unincorporated areas of Bay County, Callaway, Panama City, Panama City Beach, Parker, Lynn Haven, and Springfield. A description of the current Bay County Public Transit System is included in Attachment B.

**Title VI Liaison**
Gene Keen
Operations Manager
(850) 215-7083
919 Massalina Drive
Panama City, Florida 32401

The Bay County Public Transit System must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by FDOT or any other regulatory agency.
- Disseminate Title VI information to the public, including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

A. FIRST TIME APPLICANTS

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

The Bay County Public Transit System is not a first time applicant for FTA/FDOT funding.
B. ANNUAL CERTIFICATIONS AND ASSURANCES

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

The Bay County Public Transit System will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT and/or FTA.

C. TITLE VI PLAN ADOPTION

- This Title VI Plan received the Federal Transit Administration’s (FTA) concurrence on __________________________. (The TPO has not yet received FTA concurrence)
- This Title VI Plan was adopted by the Bay County Transportation Planning Organization (TPO) on July 24, 2019.
- FTA’s concurrence letter along with the minutes from the TPO meeting are in Attachment C of this Plan.
3. TITLE VI NOTICE TO THE PUBLIC

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

A. NOTICE TO PUBLIC

The Bay County Public Transit System must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the Bay County Public Transit System operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the Bay County Public Transit System’s nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the Bay County Public Transit System
- A sample of the notice is included in Attachment D of this Plan. The sample notice should be translated into other languages, as necessary.

B. NOTICE POSTING LOCATIONS

The Notice to Public will be posted at many locations to apprise the public of the Bay County Public Transit System’s obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in the following public areas:

<table>
<thead>
<tr>
<th>Location</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bay County Transit Operations</td>
<td>919 Massalina Drive Panama City, Florida 32401</td>
</tr>
<tr>
<td>and Maintenance Facility</td>
<td></td>
</tr>
<tr>
<td>Bay County Transit Administration Facility</td>
<td>1021 Massalina Drive Panama City, Florida 32401</td>
</tr>
<tr>
<td>Bay Town Trolley Buses</td>
<td>Bus interior</td>
</tr>
<tr>
<td>Bay Area Transportation Buses</td>
<td>Bus interior</td>
</tr>
<tr>
<td>Bay Town Trolley Website</td>
<td><a href="http://www.baytowntrolley.org">www.baytowntrolley.org</a></td>
</tr>
<tr>
<td>Bay Area Transportation Website</td>
<td><a href="http://www.bayareatransit.org">www.bayareatransit.org</a></td>
</tr>
</tbody>
</table>

A sample of the notice is included in Attachment D of this plan along with translated versions of the notice.
4. TITLE VI PROCEDURES AND COMPLIANCE

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public.

A. COMPLAINT PROCEDURE

It is the policy of the Bay County Public Transit System under Title VI of the Civil Rights Act of 1964, as amended, that no person in the United States shall, on the basis of race, color or national origin be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by this agency or its sub-recipients.

Any person who believes he or she has been discriminated against by the Bay County Public Transit System may file a Title VI complaint by completing and submitting a Title VI complaint form.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 180 days after the alleged incident to:

Gene Keen, Title VI Coordinator
919 Massalina Drive Panama City, Florida 32401
(850) 215-7083 phone
Gene.Keen@firstgroup.com

The Bay County Public Transit System will only process and investigate complete complaints received no more than 180 days after the alleged incident.

The following procedures will be followed to investigate formal Title VI complaints:

1. Once the complaint is received, the Bay County Public Transit System will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter or email informing her/him whether the complaint will be investigated by our office.

2. The Bay County Public Transit System has 60 days to investigate the complaint. If more information is needed to resolve the case, the Bay County Public Transit System may contact the complainant. The complainant has 10 business days from the date of contact to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Bay County Public Transit System can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
3. After the investigator reviews the complaint, he/she will issue one of two determination letters/emails to the complainant: a closure letter/email or a letter/email of finding. A closure letter/email summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter/email of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, he/she has 30 days to do so from the time he/she receives the closure letter/email or the letter/email of finding.

4. The complainant may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, East Building, 5th Floor TCR, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590

The complaint procedure is available to the public at the Bay County Public Transit Administration Facility, on both the Bay Town Trolley website at BayTownTrolley.org, and the Bay Area Transportation website at BayAreaTransit.org.

B. COMPLAINT FORM

A copy of the complaint form in English and Spanish is provided in Attachment E of this plan and on both the Bay Town Trolley website at BayTownTrolley.org and the Bay Area Transportation website at BayAreaTransit.org.

C. RECORDS RETENTION AND REPORTING POLICY

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. The Bay County Public Transit System will submit Title VI Plans to FDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

D. SUB-RECIPIENT ASSISTANCE AND MONITORING

FTA Circular 4702.1B, Chapter III, Paragraph 11: Primary recipients should assist their sub-recipients in complying with DOT’s Title VI regulations, including the general reporting requirements.

The Bay County Public Transit System does not have any sub-recipients to provide monitoring and assistance. In the future, if the Bay County Public Transit System has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.
E. CONTRACTORS AND SUBCONTRACTORS

The Bay County Public Transit System is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. The Bay County Public Transit System, contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

- Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “Contractor”) must agree to the following clauses:

1. **Compliance with Regulations**: The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.

2. **Nondiscrimination**: The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Attachment B of the Regulations.

3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment**: In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor’s obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

4. **Information and Reports**: The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation
Administration, and/or the Federal Motor Carrier Safety Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, the Bay County Public Transit System shall impose contract sanctions as appropriate, including, but not limited to:

   a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or

   b. cancellation, termination or suspension of the contract, in whole or in part.

6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Bay County Public Transit System, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

   - **Disadvantaged Business Enterprise (DBE) Policy**

As a part of our Master Grant Agreement and Certs and Assurances with FTA the Bay County Public Transit System and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises, as defined in 49 CFR Part 26 as amended, have the opportunity to participate in the performance of contracts. The Bay County Public Transit System and its contractors and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of FDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of the contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

   - **E-Verify**

As a part of the JPA with FDOT and/or FTA, vendors and contractors of the Bay County Public Transit System shall utilize the U.S. Department of Homeland Security’s E-Verify
system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with the Bay County Public Transit System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for the Bay County Public Transit System shall likewise utilize the U.S. Department of Homeland Security’s E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for the Bay County Public Transit System.
5. TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 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…; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), the Bay County Public Transit System must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by the Bay County Public Transit System in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to FDOT and/or FTA.

The Bay County Public Transit System has had one investigation, complaint, or lawsuit involving allegations of discrimination on the basis of race, color, or national origin over the past three 3 years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

<table>
<thead>
<tr>
<th>Type of Process</th>
<th>Date (Month, Day, Year)</th>
<th>Summary (Including basis of complaint: race, color, national origin, sex, age, handicap/disability, income status, retaliation, or other)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawsuits</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Santa Ynez Valley Transportation Services (SYVTS), Mark Meeks</td>
<td>6/25/15</td>
<td>A breach of contract complaint filed in the Circuit Court for Bay County naming FDOT and the TPO as defendants. On July 28, 2015, SYVTS filed a first amended complaint adding West Florida Regional Planning Council (WFRPC) as a defendant. On February 26, 2016, SYVTS filed a second amended complaint dropping FDOT from the complaint and making some cosmetic changes.</td>
<td>Closed but being appealed</td>
<td>WFRPC moved to be dismissed from the first amended complaint because it was not a party to the contract. On 2/3/16 the court granted that motion. WFRPC filed a motion to be dismissed from the second amended complaint. On 9/16/17 the court granted that motion with prejudice. TPO moved for a Summary Judgment. On 1/18/18 the court granted the motion for Summary Judgment. SYVTS is appealing the ruling for Summary Judgment in favor of the TPO.</td>
</tr>
<tr>
<td>Complaints</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>1. Santa Ynez Valley Transportation Services (SYVTS), Mark Meeks</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2/17/15 Complaint alleges that the TPO, FDOT, and the TPO’s current operator, First Transit, conspired against SYVTS company by enlisting PrMPT to conduct a maintenance review of the fixed route and demand response systems. On April 10, 2015, a revised complaint was received from SYVTS by FDOT alleging race discrimination and retaliation by the TPO, FDOT and First Transit.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Closed On September 8, 2015, FDOT Title VI Coordinator, Jacqueline Paramore closed the complaint because the information provided failed to sufficiently allege that Mark Meeks, or SYVTS, were adversely affected because of their race/ethnicity (Native American) or in retaliation for having made a complaint about protected class discrimination in violation of the Civil Rights Act of 1964.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2. Santa Ynez Valley Transportation Services (SYVTS), Mark Meeks</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8/31/15 SYVTS owner, Mark Meeks, filed a Title VII complaint of employment discrimination against the TPO with the U.S. Equal Employment Opportunity Commission (EEOC).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Closed On September 3, 2015 the EEOC determined that no employer/employee relationship existed between the TPO and Mark Meeks and dismissed the complaint/charge.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
6. PUBLIC PARTICIPATION PLAN

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient’s targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for the Bay County Public Transit System was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for the Bay County Public Transit System. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about the Bay County Public Transit System services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Attachment F to this Title VI Plan.

- Current Outreach Efforts

The Bay County Public Transit System is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of the Bay County Public Transit System’s recent, current, and planned outreached activities.

1. Created a new ride guide for Bay Town Trolley and Bay Area Transportation and translated them into Spanish.

2. Published the Spanish versions of the Bay Town Trolley and Bay Area Transportation ride guides on both websites BayTownTrolley.org and BayAreaTransit.org.

3. Translated the Title VI complaint procedures and complaint form for Bay Town Trolley and Bay Area Transportation into Spanish.

4. Published the Spanish versions of the Bay Town Trolley and Bay Area Transportation Title VI complaint procedures and complaint form on both websites BayTownTrolley.org and BayAreaTransit.org.

5. Translated the Americans with Disabilities Act (ADA) complaint procedures and complaint form for Bay Town Trolley and Bay Area Transportation into Spanish.

6. Published the Spanish versions of the Bay Town Trolley and Bay Area Transportation Disabilities Act (ADA) complaint procedures and complaint form on both websites BayTownTrolley.org and BayAreaTransit.org.
7. Translated the Eligibility Application for Bay Area Transportation into Spanish.

8. Published the Spanish version of the Bay Area Transportation’s Eligibility Application on the BayAreaTransit.org website.

9. Added Google Translator to the Bay Town Trolley and Bay Area Transportation websites BayTownTrolley.org and BayAreaTransit.org.

10. Participated in a joint Science Technology Engineering and Math (STEM) event with Florida State University, Gulf Coast State College, Navy Base, and Bay District Schools.

11. Presented at the West Florida Regional Planning Council’s public forum on ways to provide employers with transportation solutions for their employees.

12. Presented at Gulf Coast State College’s Citizen’s Academy on the Bay County Public Transportation System and the availability of transit resources in the Bay County area.

13. Participated in the Fourth Annual Emerald Coast Transportation Symposium.

14. Will be participating in the Fifth Annual Emerald Coast Transportation Symposium, November 1st and 2nd, 2018.

15. Held public meetings to discuss updates within the Bay County Public Transit System. Meetings were held during various times of day at an accessible location within one block of a regular bus stop.

16. Participated in a national initiative called “Dump the Pump” in which drivers were encouraged to take public transportation for one day. Rides were provided to all riders free of charge.

17. Currently installing a real-time passenger application on Bay Town Trolley which will allow riders to easily locate their bus by way of an application available via website, text, or telephone. This application is particularly useful for those riders with a site or hearing impairment.

18. Held multiple public workshops on the Transportation Development Plan (TDP).
7. LANGUAGE ASSISTANCE PLAN

The Bay County Public Transit System operates a transit system within Callaway, Lynn Haven, Panama City, Panama City Beach, Parker, Springfield, and unincorporated areas of Bay County. The Language Assistance Plan (LAP) has been prepared to address the Bay County Public Transit System’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the Bay County Public Transit System service area there are 4,346 residents or 2.6% who describe themselves as not able to communicate in English very well (Source: 2013-2017 American Community Survey 5-Year Estimates). The Bay County Public Transit System is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The Bay County Public Transit System has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Attachment G.

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).
8. TRANSIT PLANNING AND ADVISORY BODIES

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

- **Bay County Transportation Planning Organization (TPO)**
  Deviated Fixed Route System

  The Bay County Transportation Planning Organization (TPO) is the local, intergovernmental transportation policy board for Bay County, Florida. The board is comprised of 19 locally elected government officials who make decisions regarding transportation at the county level. The Bay County TPO is required by state and federal legislation to establish a continuing, cooperative, and comprehensive planning process. The TPO also works to increase safety, security, accessibility, mobility, and connectivity for people and freight. In addition to the TPO Board, the Bay County TPO has a Technical Coordinating Committee (TCC) and a Citizens’ Advisory Committee (CAC).

  The TCC is made up of local government staff and other stakeholders. Their knowledge of local projects and issues allow the members of the TCC to provide technical advice to the TPO board.

  The CAC is comprised of members of the general public who express an interest in transportation planning. Prospective members complete an application and must be approved by the committee and the TPO board.

- **Minority Representation Table**
  The table below depicts the Bay County Public Transit System’s non-elected committees/councils related to fixed route transportation.

<table>
<thead>
<tr>
<th>Body</th>
<th>White</th>
<th>Hispanic</th>
<th>African American</th>
<th>American Indian</th>
<th>Asian</th>
<th>Two or More Races</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Population</td>
<td>82.2%</td>
<td>4.8%</td>
<td>10.8%</td>
<td>0.7%</td>
<td>2.0%</td>
<td>3.1%</td>
</tr>
<tr>
<td>Technical Coordinating Committee</td>
<td>94.4%</td>
<td>0.0%</td>
<td>5.6%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Citizen Advisory Committee</td>
<td>84.6%</td>
<td>0.0%</td>
<td>15.4%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
</tbody>
</table>
Bay County Board of County Commissioners (BOCC) Demand Response System

The Bay County Board of County Commissioners is the Community Transportation Coordinator (CTC) for Bay County, Florida. The board is comprised of 5 locally elected government officials who make decisions regarding the transportation disadvantaged population at the county level. In addition to the BOCC Board, the Commission has a Local Coordinating Board (LCB).

The LCB is comprised of state agencies and community representatives of the transportation disadvantaged population. The LCB work to identify local service needs and to provide information, advice, and direction to the Bay County Board of County Commissioners as the CTC.
9. TITLE VI EQUITY ANALYSIS

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR, Attachment C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, the Bay County Public Transit System will ensure the following:

1. The Bay County Public Transit System will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The Bay County Public Transit System will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

2. When evaluating locations of facilities, the Bay County Public Transit System will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.

3. If the Bay County Public Transit System determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the Bay County Public Transit System may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The Bay County Public Transit System must demonstrate and document how both tests are met. The Bay County Public Transit System will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The Bay County Public Transit System plans to renovate the following facility.

- Bay County Transit Staff Administration Facility
  1021 Massalina Drive Panama City, Florida 32401.
The above described property is owned by the Bay County Public Transit System and was used as the Bay County Public Transit System Administration and Maintenance Facility up until 2016 when a new facility was constructed on the adjacent property.

Pursuant to FTA C. 4701.1B an equity analysis only applies to projects requiring land acquisition and displacement of persons from their residences and business. Because the proposed building and land is currently owned by the Bay County Public Transit System and no person will be displaced from their residence or business, an equity analysis is not required.
10. SYSTEM-WIDE SERVICE STANDARDS AND SERVICE POLICIES

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

The Bay County Public Transit System is a deviated fixed route service provider.

The Bay County Public Transit System has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

A. SERVICE STANDARDS

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. The Bay County Public Transit System has prepared standards for all modes it operates including deviated fixed route and demand response.

a. Vehicle Load

<table>
<thead>
<tr>
<th>Vehicle Type</th>
<th>System Type</th>
<th>Seated</th>
<th>Standing</th>
<th>Total</th>
<th>Max. Load Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Braun Entervan</td>
<td>Demand</td>
<td>4</td>
<td>-</td>
<td>4</td>
<td>1.00</td>
</tr>
<tr>
<td>El Dorado Amerivan</td>
<td>Demand</td>
<td>5</td>
<td>-</td>
<td>5</td>
<td>1.00</td>
</tr>
<tr>
<td>Champion Challenger</td>
<td>Demand</td>
<td>14</td>
<td>7</td>
<td>21</td>
<td>1.50</td>
</tr>
<tr>
<td>Turtle Top Terra Transit</td>
<td>Demand</td>
<td>14</td>
<td>7</td>
<td>21</td>
<td>1.50</td>
</tr>
<tr>
<td>Glaval Universal</td>
<td>Demand</td>
<td>14</td>
<td>8</td>
<td>22</td>
<td>1.50</td>
</tr>
<tr>
<td>El Dorado Amerivan</td>
<td>Fixed</td>
<td>5</td>
<td>-</td>
<td>5</td>
<td>1.00</td>
</tr>
<tr>
<td>Supreme Trolley</td>
<td>Fixed</td>
<td>29</td>
<td>14</td>
<td>43</td>
<td>1.48</td>
</tr>
<tr>
<td>El Dorado EZ Rider II</td>
<td>Fixed</td>
<td>29</td>
<td>14</td>
<td>43</td>
<td>1.48</td>
</tr>
<tr>
<td>El Dorado EZ Rider II</td>
<td>Fixed</td>
<td>31</td>
<td>16</td>
<td>47</td>
<td>1.52</td>
</tr>
<tr>
<td>Champion Defender</td>
<td>Fixed</td>
<td>36</td>
<td>18</td>
<td>54</td>
<td>1.50</td>
</tr>
<tr>
<td>Champion Defender</td>
<td>Fixed</td>
<td>26</td>
<td>13</td>
<td>39</td>
<td>1.50</td>
</tr>
<tr>
<td>Arboc Spirit of Liberty</td>
<td>Fixed</td>
<td>26</td>
<td>13</td>
<td>39</td>
<td>1.50</td>
</tr>
<tr>
<td>Arboc Spirit of America</td>
<td>Fixed</td>
<td>33</td>
<td>17</td>
<td>50</td>
<td>1.50</td>
</tr>
</tbody>
</table>
b. Vehicle Headway

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Monday-Friday</th>
<th>Saturday</th>
</tr>
</thead>
<tbody>
<tr>
<td>Route 1</td>
<td>60 minutes</td>
<td>120 minutes</td>
</tr>
<tr>
<td>Route 2</td>
<td>60 minutes</td>
<td>120 minutes</td>
</tr>
<tr>
<td>Route 3</td>
<td>60 minutes</td>
<td>120 minutes</td>
</tr>
<tr>
<td>Route 4</td>
<td>60 minutes</td>
<td>120 minutes</td>
</tr>
<tr>
<td>Route 5</td>
<td>60 minutes</td>
<td>120 minutes</td>
</tr>
<tr>
<td>Route 6</td>
<td>60 minutes</td>
<td>120 minutes</td>
</tr>
<tr>
<td>Route 7</td>
<td>60 minutes</td>
<td>120 minutes</td>
</tr>
<tr>
<td>Route 8</td>
<td>60 minutes</td>
<td>-</td>
</tr>
</tbody>
</table>

On Monday, Tuesday, Wednesday, Thursday, and Friday city routes alternate on 60 minute headways. On Saturday city routes alternate on two hour headways. Route 8 does not operate on Saturdays.

Headways do not apply to Bay Area Transportation as it is a demand response system for the elderly, disabled, low income, and individuals not living within ¾ of a mile of the Bay Town Trolley routes.

c. On-Time Performance

A Bay Town Trolley vehicles is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than ten (10) minutes late. The Bay County Public Transit System’s on-time performance objective is 90% or greater. The Bay County Public Transit System continuously monitors on-time performance and system results are discussed publicly during regularly scheduled public meetings.

d. Service Availability

Bay Town Trolley provides public transportation service to the following communities within Bay County: City of Callaway, City of Panama City, City of Panama City Beach, City of Parker, City of Lynn Haven, City of Springfield and to the unincorporated areas of Bay County. It is our goal to provide transit service to residential areas, major medical, shopping, government, employment centers, and activity centers that can support those route services.

B. SERVICE POLICIES

FTA requires fixed route transit providers to develop a policy for service indicators. The Bay County Public Transit System has prepared the following policies for its transit system.

a. Distribution of Transit Amenities

Installation of transit amenities along bus routes are based on the number of passengers boarding at stops along those routes.
b. Vehicle Assignment

Vehicle with the largest fuel capacity should be assigned to the routes that are the furthest from the transit facility. Vehicles with high seating capacity should be assigned to the routes that have the highest ridership. All other vehicles are cycled to different routes on a regular basis.
11. ATTACHMENTS

ATTACHMENT A: FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS

ATTACHMENT B: CURRENT SYSTEM DESCRIPTION

ATTACHMENT C: TITLE VI PLAN ADOPTION

ATTACHMENT D: FTA CONCURRENCE

ATTACHMENT E: TITLE VI NOTICE TO PUBLIC

ATTACHMENT F: TITLE VI COMPLAINT FORM

ATTACHMENT G: PUBLIC PARTICIPATION PLAN

ATTACHMENT H: LANGUAGE ASSISTANCE PLAN

ATTACHMENT I: OPERATING AREA LANGUAGE DATA
ATTACHMENT A

FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

**General Requirements**

All recipients must submit:

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

Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint).

Title VI Complaint Form.

List of transit-related Title VI investigations, complaints, and lawsuits.

Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission.

Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance.

A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees.

Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions.

A Title VI equity analysis if the recipient has constructed a facility such as a vehicle storage facility, maintenance facility, operation center, etc.

A copy of board meeting minutes, resolutions, 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. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.

Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)
**Requirements of Transit Providers**

All Fixed Route Transit Providers must submit:

All requirements set out in Chapter III (General Requirements)

Service standards

- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode

Service policies

- Transit Amenities for each mode
- Vehicle Assignment for each mode

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 must submit:

Demographic and service profile maps and charts

Demographic ridership and travel patterns, collected by surveys

Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis

A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy

Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis
ATTACHMENT B

CURRENT SYSTEM DESCRIPTION
CURRENT SYSTEM DESCRIPTION

1. An overview of the organization including its mission, program goals and objectives.

The Bay County Public Transit System’s current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.

2. Organizational structure, type of operation, number of employees, service hours, staffing plan, and safety and security plan.

The Bay County Public Transit System is made up of a Deviated Fixed Route System called Bay Town Trolley and a Demand Response System called Bay Area Transportation. The following is an overview of each system:

Deviated Fixed Route System

The Deviated Fixed Route System operates under the name Bay Town Trolley. The system is administered by the Bay County Transportation Planning Organization (TPO) which is made up of elected officials from the Bay County Board of County Commissioners and every municipal government within the Bay County area. The TPO is the recipient of local, state, and federal funds.

On October 1, 2013, the TPO established an agreement with the Bay County Board of County Commissioners Transit Department to perform all financial, procurement, planning, and other administrative functions on behalf of the TPO. The Transit Department is managed by a Transit Program Administrator who is responsible for the comprehensive oversight of the Deviated Fixed Route System’s transit related functions and answers directly to the TPO.

On August 1, 2013, the TPO established an agreement with the West Florida Regional Planning Council (WFRPC) to staff planning meetings, and conduct other non-transit related functions for the TPO. The WFRPC is managed by an Executive Director who oversees all non-transit related functions.

On July 1, 2014, the TPO entered into a five year contract with First Transit, to operate the deviated fixed route system. First Transit employs 19 full time drivers, 6 part time drivers, and 0 volunteers to operate Bay Town Trolley. First Transit operates the Deviated Fixed Route System out of the Bay County Transit Administration and Maintenance Facility located at 919 Massalinia Drive in Panama City, Florida. The transit facility is open to the public Monday thru Friday 8:00 am to 5:00 pm.

Bay Town Trolley is a Deviated Fixed Route System that consists of eight routes and operates on weekdays and Saturdays from 6:00 a.m. to 8:00 p.m. On Saturday, only seven routes are in operation. There are a total of 18 grant-funded vehicles made up of modified vans, trolleys, and buses. The basic adult fare for fixed route bus service is $1.50. A reduced fare of $0.75 is
offered during all hours of service to students, senior citizens, Medicare cardholders, and persons with disabilities.

Demand Response System

The Demand Response System operates under the name Bay Area Transportation. The system is administered by the Bay County Board of County Commissioners (BOCC) as the Community Transportation Coordinator (CTC), which is made up of five elected officials from within the Bay County area. The BOCC is the recipient of local, state, and federal funds.

On January 1, 2014, the BOCC established an emergency agreement with the Florida Commission for Transportation Disadvantaged (TD) to act as the CTC and serve the transportation disadvantaged for the community that includes the entire Bay County area.

The BOCC Transit Department performs all financial, procurement, planning, and other administrative functions. The Transit Department is managed by a Transit Program Administrator, who is responsible for the comprehensive oversight of the Demand Response System transit related functions and answers directly to the BOCC Budget Office. An organizational chart outlining the chain of command is attached at the end of this document.

On June 1, 2014, the BOCC entered into a temporary emergency contract with First Transit, to operate the demand response system. On June 1, 2016, the BOCC awarded a contract to First Transit to continue operating the demand response system. First Transit employs 29 full time drivers, 11 part time drivers, and 0 volunteers to operate Bay Area Transportation. First Transit operates the demand response system out of the Bay County Transit Administration and Maintenance Facility located at 919 Massalina Drive in Panama City, Florida. The transit facility is open to the public Monday thru Friday 8:00 am to 5:00 pm.

Bay Area Transportation operates ambulatory and wheelchair service weekdays and Saturdays from 6:00 a.m. to 6:00 p.m. throughout the Bay County Area only. There are a total of 29 grant-funded vehicles made up of modified vans and buses. The demand response fare varies by length and type of trip and the subsidy offered by the sponsoring agencies.

All public transportation services are provided in accordance with the Bay County Public Transit System’s approved Operations Manual/System Safety Program Plan/Security Program Plan and its Transportation Disadvantaged Service Plan (TDSP).

3. **Indicate if your agency is a government authority or a private non-profit agency.**

   The Bay County Public Transit System, made up of the TPO and BOCC, is a government authority.

4. **Who is responsible for insurance, training and management, and administration of the agency’s transportation programs?**
The Bay County Public Transit System’s Operator, First Transit, is responsible for training and management of our transportation program. All safety sensitive employees are required to complete an FDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road driver’s training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Safety/Security Manager is responsible for annual renewal of all liability insurance for all transit related vehicles. It is the General Manager’s responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles. The BOCC Transit Department provides ongoing oversite and conducts annual evaluations of the operator to ensure continued compliance with state and federal requirements.

5. **Who provides vehicle maintenance and record keeping?**

Maintenance on all agency vehicles is provided by First Transit. First Transit employs technicians with experience working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the FDOT Preventative Maintenance Guidelines document. All vehicle files are kept on-site at the Bay County Transit Operations and Maintenance Facility located at 919 Massalina Drive in Panama City, Florida and are maintained by the Maintenance Manager. All driver files are kept on-site at the Bay County Transit Operations and Maintenance Facility located at 919 Massalina Drive in Panama City, Florida and are maintained by the Safety/Security Manager. All records are maintained and retained for a minimum of five (5) years following contract completion and closeout.

6. **Number of current transportation related employees**

Our transportation department has a total of 66 employees that include: 36 full-time drivers, 11 part-time drivers, 4 administrators and 15 support staff.

7. **Who will drive the vehicles, number of drivers, CDL certifications, etc.?**

Only transportation employees that have completed all of the required safety and driver’s training requirements will be allowed to drive agency vehicles. All of our drivers operating vehicles weighing 26,000 lbs. or more are required to carry a Commercial Driver’s License (CDL) Class B with a Passenger Endorsement, all drivers operating vehicles less than 26,000 lbs. 15 or more passenger seats are required to have a CDL Class C with a Passenger Endorsement, and all drivers operating vehicles with no more than 15 seats are required to carry a Class E Driver’s License.

8. **A detailed description of service routes and ridership numbers**

Transportation services provided through our program are available to any rider within the Callaway, Lynn Haven, Panama City, Panama City Beach, Parker, Springfield, and
unincorporated areas of Bay County. Our service incorporates both a deviated fixed route and demand response system. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Approximately 100% of the medical trips we provide are to medical facilities in Bay County. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes modified vans and buses with 46 of our vehicles being equipped to transport wheelchairs. We only provide ambulatory and wheelchair trips, no stretcher trips are provided. Our Demand Response System groups trips and multi-loads passengers to the maximum extent possible. On average, we provide 2,037 Fixed Route passenger trips per day and 315 Demand Response passenger trips per day. We leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire vehicles at a consistent pace based upon appropriate age and mileage.
ATTACHMENT C

TITLE VI PLAN ADOPTION
ATTACHMENT D

FTA CONCURRENCE
ATTACHMENT E

TITLE VI NOTICE TO PUBLIC
NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI
BAY COUNTY PUBLIC TRANSIT SYSTEM

The Bay County Public Transit System 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 he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Bay County Public Transit System. For more information on the Bay County Public Transit System’s civil rights program, and the procedures to file a complaint, contact (850) 785-0808 if riding Bay Area Transportation or (850) 769-0557 if riding Bay Town Trolley. You can also visit the Bay County Public Transit System’s Operations and Maintenance Facility at 919 Massalina Drive Panama City, Florida 32401.

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 Bay Area Transportation (850) 785-0808 or Bay Town Trolley (850) 769-0557.
NOTIFICAR AL PÚBLICO DE DERECHOS BAJO EL TÍTULO VI
SISTEMA DE TRANSPORTE PÚBLICO DEL CONDADO DE BAY

El sistema de tránsito público del Condado de Bay opera sus programas y servicios sin tener en cuenta la raza, el color y el origen nacional de acuerdo con el título VI de la ley de derechos civiles. Cualquier persona que cree que ha sido agravada por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja ante el sistema de tránsito público del Condado de Bay. Para obtener más información sobre el programa de derechos civiles del sistema de tránsito público del Condado de Bay, y los procedimientos para presentar una queja, comuníquese con (850) 785 - 0808 si está montando el área de transporte de la bahía o (850) 769 - 0557 si monta el Trolley de Bay Town. También puede visitar el centro de operaciones y mantenimiento del sistema de transporte público del Condado de Bay en 919 Massalina Drive Panama City, Florida 32401.

Un reclamante puede presentar una queja directamente con la administración federal de tránsito presentando una queja ante la oficina de derechos civiles, atención: Coordinador del programa Título VI, edificio este, 5º piso - TCR, 1200 Nueva Jersey Ave., SE, Washington, DC 20590.

Si necesita información en otro idioma, comuníquese con el área de transporte de la Bahía (850) 785 - 0808 o Trolley de la ciudad de la Bahía (850) 769 - 0557.
ATTACHMENT F

TITLE VI COMPLAINT FORM
Bay County Public Transit System

Title VI Complaint Form

The Bay County Public Transit System is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit program, policy or activity on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the Bay County Public Transit System.

Please provide the following information in order to process your complaint. Assistance is available upon request. The completed form must be returned to:

Bay County Public Transit System
919 Massalina Drive Panama City, Florida 32401
Attn: Gene Keen, Title VI Coordinator
Telephone (850) 215-7083
Or email Geen.Keen@firstgroup.com.

<table>
<thead>
<tr>
<th>Section I:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Complainant(s) Name:</td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>Telephone (Home):</td>
<td>Telephone (Work):</td>
</tr>
<tr>
<td>Email Address:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section II:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Complainant(s) Representative’s Name:</td>
<td></td>
</tr>
<tr>
<td>Relationship (e.g. friend, attorney, parent, etc.):</td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>Telephone (Home):</td>
<td>Telephone (Work):</td>
</tr>
<tr>
<td>Email Address:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section III:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>What was the discrimination based on? (check all that apply):</td>
<td></td>
</tr>
<tr>
<td>Race</td>
<td>Color</td>
</tr>
<tr>
<td>Date of Incident:</td>
<td>Time of Incident</td>
</tr>
<tr>
<td><strong>Location where incident occurred:</strong></td>
<td></td>
</tr>
<tr>
<td>--------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Name of person who allegedly subjected you to Title VI discrimination:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Section IV</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Did anyone else witness the incident? (If yes list witnesses)</td>
</tr>
<tr>
<td>☐ Yes ☐ No</td>
</tr>
<tr>
<td>Witness Name:</td>
</tr>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Telephone (Home):</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Section V</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Have you filed this complaint with any Federal, State, or Local agency/court?</td>
</tr>
<tr>
<td>☐ Yes ☐ No</td>
</tr>
<tr>
<td>If yes, check all that apply:</td>
</tr>
<tr>
<td>☐ Federal ☐ Federal Court ☐ State ☐ State Court ☐ Local ☐ Local Court</td>
</tr>
<tr>
<td>Please provide the name of the Agency/Court where the complaint was filed.</td>
</tr>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Agency:</td>
</tr>
</tbody>
</table>

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

______________________________
Complainant/Representatives Signature:

______________________________
Date:
**Sistema de Tránsito Público del Condado de Bay**

**Formulario de quejas del Título VI**

El Sistema de Tránsito Público del Condado de Bay se compromete a garantizar que ninguna persona sea excluida de participación o negación de los beneficios de su programa, política o actividad de tránsito por motivos de raza, color u origen nacional según lo protegido por el Título VI de la Ley de Derechos Civiles de 1964, según enmendada. Si cree que ha sido objeto de discriminación en virtud del Título VI, puede presentar una queja por escrito ante el Sistema de Tránsito Público del Condado de Bay.

Por favor, proporcione la siguiente información para procesar su queja. La asistencia está disponible bajo petición. El formulario completado debe ser devuelto a:

Sistema de Tránsito Público del Condado de Bay  
919 Massalina Drive Ciudad de Panamá, Florida 32401  
A la atención de: Gene Keen, Coordinador del Título VI  
Teléfono (850) 215-7083  
O envíe un correo electrónico a Geen.Keen@firstgroup.com.

<table>
<thead>
<tr>
<th>Sección I:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nombre del demandante (s):</td>
</tr>
<tr>
<td>Dirección:</td>
</tr>
<tr>
<td>Teléfono (Hogar):</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sección II:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nombre del / de la / los Representante / s de la demandante:</td>
</tr>
<tr>
<td>Relación (por ejemplo, amigo, abogado, padre, etc.):</td>
</tr>
<tr>
<td>Dirección:</td>
</tr>
<tr>
<td>Teléfono (Hogar):</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sección III:</th>
</tr>
</thead>
<tbody>
<tr>
<td>¿En qué se basó la discriminación? (marque todo lo que corresponda):</td>
</tr>
<tr>
<td>☐ Carrera</td>
</tr>
<tr>
<td>fecha del incidente:</td>
</tr>
</tbody>
</table>
Lugar donde ocurrió el incidente:

Nombre de la persona que supuestamente lo sometió a discriminación del Título VI:

<table>
<thead>
<tr>
<th>Sección IV:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>¿Alguien más fue testigo del incidente? (Si es así, enumere testigos)</td>
<td></td>
</tr>
<tr>
<td>☐ Sí</td>
<td>☐ No</td>
</tr>
<tr>
<td>Nombre del testigo:</td>
<td></td>
</tr>
<tr>
<td>Dirección:</td>
<td></td>
</tr>
<tr>
<td>Teléfono (Hogar):</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sección V:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>¿Ha presentado esta queja ante alguna agencia / corte federal, estatal o local?</td>
<td></td>
</tr>
<tr>
<td>☐ Sí</td>
<td>☐ No</td>
</tr>
<tr>
<td>En caso afirmativo, marque todo lo que corresponda:</td>
<td></td>
</tr>
<tr>
<td>☐ Federal</td>
<td>☐ Corte federal</td>
</tr>
<tr>
<td>Por favor proporcione el nombre de la Agencia / Corte donde se presentó la queja.</td>
<td></td>
</tr>
<tr>
<td>Nombre:</td>
<td>Título:</td>
</tr>
<tr>
<td>Agencia:</td>
<td>Teléfono:</td>
</tr>
</tbody>
</table>

Por la presente juro / afirmo que la información que he proporcionado con respecto a esta Reclamación del Título VI es verdadera y correcta a mi leal saber y entender.

Firma del demandante / representante: __________________________  Fecha: __________________________
ATTACHMENT G

PUBLIC PARTICIPATION PLAN
Introduction

The Public Participation Plan (PPP) for the Bay County Public Transit System was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for the Bay County Public Transit System. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about the Bay County Public Transit System’s services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The Bay County Public Transit System also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, area agencies, community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about the Bay County Public Transit System and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** The Bay County Public Transit System will proactively reach out and engage low-income, minority, and LEP populations living in the Bay County Public Transit System’s service area so these groups will have an opportunity to participate.

- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public’s participation – physically, geographically, temporally, linguistically and culturally.

- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.

- **Responsive:** The Bay County Public Transit System will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.

- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
Flexible: The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of the Bay County Public Transit System. The Bay County Public Transit System intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

The Bay County Public Transit System will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on both the Bay Town Trolley website at BayTownTrolley.org and the Bay Area Transportation website at BayAreaTransit.org. Any feedback received on the site will be documented and referred to the Bay County Public Transit System administration for consideration. The public will also be able to call the Bay Town Trolley at 850-769-0557 and/or the Bay Area Transportation offices at 850-785-0808, during its hours of operation. Feedback collected over the phone will be documented and referred on to Bay County Public Transit System administration for consideration. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, the Bay County Public Transit System will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement;
- Posters or flyers in transit center;
Posting information on website;
Press releases and briefings to media outlets;
Flyers and information distribution through various libraries and other civic locations;
Communications to relevant elected officials;
Other methods required by local or state laws or agreements.

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

Public Hearing
The Bay County Public Transit System, as described in the Current System Description, is made up of two public transportation systems, deviated fixed route and demand response. Each system is separately governed by a governmental board before which public hearings are held to allow public participation, answer questions, provide input, establish priorities, direct staff, and achieve a consensus on specific recommendations.

Deviated Fixed Route System

**Bay County Transportation Planning Organization (TPO):** Meetings are typically held six times a year on the fourth Wednesday of the month at 3:30 p.m. Meetings take place in the Commission Chambers of the Bay County Government Center located at 840 W. 11th Street, Panama City, Florida 32401.

**Bay County TPO Citizens Advisory Committee (CAC):** Meetings are typically held six times a year on the fourth Wednesday of the month at 1:30 p.m. Meetings take place in the Commission Chambers of the Bay County Government Center located at 840 W. 11th Street Panama City, Florida 32401.

**Bay County TPO Technical Coordinating Committee (TCC):** Meetings are typically held six times a year on the fourth Wednesday of the month at 11:00 a.m. Meetings take place in the Commission Chambers of the Bay County Government Center located at 840 W. 11th Street Panama City, Florida 32401.

Demand Response System

**Bay County Community Transportation Coordinator (CTC):** The Bay County Board of County Commissioners is designated as the CTC for Bay County. Meetings are typically held 24 times a year on the first and third Tuesday of every month at 9:00 a.m. Meetings take place in the Commission Chambers of the Bay County Government Center located at 840 W. 11th Street Panama City, Florida 32401.
Local Coordinating Board (LCB): Meetings are typically held four times a year on the first Wednesday of the month at 1:00 p.m. Meetings take place in room 1030 of the Bay County Government Center located at 840 W. 11th Street Panama City, Florida 32401.
ATTACHMENT H

LANGUAGE ASSISTANCE PLAN
BAY COUNTY PUBLIC TRANSIT SYSTEM

LANGUAGE ASSISTANCE PLAN

I. Introduction

The Bay County Transportation Planning Organization operates a transit system within Bay County, Florida. The Language Assistance Plan (LAP) has been prepared to address the Bay County Public Transit System’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the Bay County Public Transit System’s service area there are 4,346 residents or 2.6% who describe themselves as not able to communicate in English “very well” (Source: US Census 2012-2016 American Community Survey 5-Year Estimates). The Bay County Public Transit System is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The Bay County Public Transit System has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) “ (hereinafter “Handbook”), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 dated August 16, 2000 states that recipients of federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important that the Bay County Public Transit System be able to communicate effectively with all of its riders. When the Bay County Public Transit System is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. The Bay County Public Transit System is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency’s services in accordance with Title VI.
This plan will demonstrate the efforts that the Bay County Public Transit System undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

Identification: Identifying LEP populations in service areas;

Notification: Providing notice to LEP individuals about their right to language services;

Interpretation: Offering timely interpretation to LEP individuals upon request;

Translation: Providing timely translation of important documents;

Staffing: Identifying staff employed by the Bay County Public Transit System to assist LEP customers;

Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify the LEP population that may use the Bay County Public Transit System’s services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Bay County Public Transit System program, activity or service;

2. The frequency with which LEP persons come in contact with the Bay County Public Transit System programs, activities or services;

3. The nature and importance of programs, activities or services provided by the Bay County Public Transit System to the LEP population;

4. The resources available to the Bay County Public Transit System and overall costs to provide LEP assistance.

a. Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population

Of the 164,531 residents in the Bay County Public Transit System’s service area, 4,346 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize the Bay County Public Transit System’s services. For the Bay County Public Transit System service area, the
US Census 2012-2016 American Community Survey 5-Year Estimates show that among the area’s population 97.4% speak English “very well”. For groups who speak English “less than very well”, 1.2% speak Spanish languages.

Attachment H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Bay County Public Transit System service area.

b. **Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services**

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Bay County Public Transit System has assessed the frequency with which LEP individuals come into contact with the transit system. The methods utilized for this assessment include analysis of census data, examining phone inquiries, requests for translated documents, and staff surveys. As discussed above, census data indicates that the area of Bay County has a prominent population of Spanish, Asian and Pacific Islanders. Phone inquiries and staff survey feedback indicated that Bay County Public Transit System dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 3 years, Bay County Public Transit System has had 0 requests for translated documents.

c. **Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People’s Lives**

Public transportation and regional transportation planning is vital to many people’s lives. According to the Department of Transportation’s Policy Guidance Concerning Recipient’s Responsibilities to LEP Persons, providing public transportation access to LEP persons is crucial. A LEP person’s inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An onboard sampling of riders was conducted to determine the amount of usage and access to the Bay County Public Transit System’s services. According to the sampling, the most common age among all the participants was 30 or older.

To further access personal mobility options, each respondent was asked how he or she would have made the trip had the Bay County Public Transit System not been available. The most frequent response was “friend of family member” (40 percent). An additional 25 percent indicated they would not have been able to make the trip if
the service was not available. This data indicates that the Bay County Public Transit System’s service is very important as a primary means of transportation for its customers.

d. **Factor 4: The Resources Available to the Recipient and Costs**

The Bay County Public Transit System assessed the available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following:

- Spanish translation of the Bay Town Trolley Ride Guide, Cost: $320.00
- Spanish translation of the Bay Area Transportation Ride Guide. Cost: $320.00
- Spanish version of the Bay Area Transportation Ride Guide available on website [BayAreaTransit.org](http://BayAreaTransit.org). Cost: $200.00
- Spanish translation of the Title VI notice to public and complaint form. Cost: $320.00
- Spanish version of Title VI notice and complaint form available on website [BayTownTrolley.org](http://BayTownTrolley.org). Cost: $200.00
- Spanish version of Title VI notice and complaint form available on website [BayAreaTransit.org](http://BayAreaTransit.org). Cost: $200.00
- Spanish translation of the Americans with Disabilities Act (ADA) notice to public and complaint form. Cost: $320.00
- Spanish version of Americans with Disabilities Act (ADA) notice to public and complaint form available on website [BayTownTrolley.org](http://BayTownTrolley.org). Cost: $200.00
- Spanish version of Americans with Disabilities Act (ADA) notice to public and complaint form available on website [BayAreaTransit.org](http://BayAreaTransit.org). Cost: $200.00
- Spanish translation of the Bay Area Transportation eligibility application. Cost: $320.00
- Spanish version of the Bay Area Transportation eligibility application available on website [BayAreaTransit.org](http://BayAreaTransit.org). Cost: $200.00
- Google Translator available on website [BayTownTrolley.org](http://BayTownTrolley.org). Cost: $200.00
Google Translator available on website BayAreaTransit.org. Cost: $200.00

Professional Personal Interpreter available 24/7 in over 200 languages. Cost: $3.95 per minute

Bay County Public Transit System provides a reasonable degree of services for LEP populations in its service area.

III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance;
2. Providing language assistance measures;
3. Training staff;
4. Providing notice to LEP persons;
5. Monitoring and updating the plan.

The five elements are addressed below.

a. **Element 1: Identifying LEP Individuals Who Need Language Assistance**

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Bay County Public Transit System has identified the number and proportion of LEP individuals within its service area using the US Census 2012-2016 American Community Survey 5-Year Estimates (see Attachment H). As presented earlier, 94% of the service area population speak English only. The largest non-English spoken language in the service area is Spanish (2.9%). Of those whose primary spoken language is Spanish, approximately 1.2% identify themselves as speaking less than “very well”.

Bay County Public Transit System may identify language assistance needed for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards available at Bay County Public Transit System Meetings. This will assist Bay County Public Transit System in identifying language assistance needs for future events and meetings.

3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Bay County Public Transit System management to follow-up.

4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. **Element 2: Language Assistance Measures**

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

Bay County Public Transit System has undertaken the following actions to improve access to information and services for LEP individuals:

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.

2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.

3. Provide Language Identification Flashcards onboard transit vehicles and in the Bay County Public Transit System offices.

4. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

c. **Element 3: Training Staff**

Federal guidance states staff members of an agency should know their obligation to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.
Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Bay County Public Transit System, the most important staff training is for transit drivers and dispatchers. Several drivers are bilingual in English and Spanish.

The following training will be provided to all staff involved in customer service:

1. Information on Title VI Procedures and LEP responsibilities;
2. Use of Language Identification Flashcards;
3. Documentation of language assistance requests;
4. How to handle a potential Title VI/LEP complaint.

d. **Element 4: Providing Note to LEP Persons**

Bay County Public Transit System will make Title VI information available in English and Spanish on the Agency’s websites. Key documents are written in English and Spanish. Notices are also posted in Bay County Public Transit System facilities and on buses. Additionally, when staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. **Element 5: Monitoring and Updating the Plan**

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

The number of documented LEP person contacts encountered annually;

How the needs of LEP persons have been addressed;

Determination of the current LEP population in the service area;

Determination as to whether the need for translation services has changed;

Determine whether Bay County Public Transit System’s financial resources are sufficient to fund language assistance resources needed.

Bay County Public Transit System understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures
undertaken to make the use of the system easier. Bay County Public Transit System is open to suggestion from all sources, including customers, Bay County Public Transit System staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. Safe Harbor Provision

DOT has adopted the Department of Justice’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Bay County Public Transit System service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Attachment H, Spanish speakers qualify for the Safe Harbor Provision as the number of persons speaking English less than “very well” is counted as 1.2% or 1,951 persons.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. The Bay County Public Transit System may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.
ATTACHMENT I

OPERATING AREA LANGUAGE DATA
<table>
<thead>
<tr>
<th>Languages</th>
<th>County</th>
<th>Population</th>
<th>Percent of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>Bay</td>
<td>164,531</td>
<td>100.0%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>Bay</td>
<td>154,636</td>
<td>94.0%</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>Bay</td>
<td>4,792</td>
<td>2.9%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>2,841</td>
<td>1.7%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>1,951</td>
<td>1.2%</td>
</tr>
<tr>
<td>French (incl. Patois, Cajun)</td>
<td>Bay</td>
<td>350</td>
<td>0.2%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>194</td>
<td>0.1%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>156</td>
<td>0.1%</td>
</tr>
<tr>
<td>French Creole</td>
<td>Bay</td>
<td>98</td>
<td>0.1%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>30</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>68</td>
<td>0.0%</td>
</tr>
<tr>
<td>Italian</td>
<td>Bay</td>
<td>66</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>60</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>6</td>
<td>0.0%</td>
</tr>
<tr>
<td>Portuguese or Portuguese Creole</td>
<td>Bay</td>
<td>203</td>
<td>0.1%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>78</td>
<td>0.1%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>125</td>
<td>0.1%</td>
</tr>
<tr>
<td>German</td>
<td>Bay</td>
<td>400</td>
<td>0.2%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>327</td>
<td>0.2%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>73</td>
<td>0.0%</td>
</tr>
<tr>
<td>Yiddish</td>
<td>Bay</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other West Germanic languages</td>
<td>Bay</td>
<td>93</td>
<td>0.1%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>93</td>
<td>0.1%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Scandinavian languages</td>
<td>Bay</td>
<td>23</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>23</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Greek</td>
<td>Bay</td>
<td>72</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>40</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>32</td>
<td>0.0%</td>
</tr>
<tr>
<td>Russian</td>
<td>Bay</td>
<td>314</td>
<td>0.2%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>Bay</td>
<td>219</td>
<td>0.1%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>Bay</td>
<td>95</td>
<td>0.1%</td>
</tr>
<tr>
<td>Polish</td>
<td>Bay</td>
<td>43</td>
<td>0.0%</td>
</tr>
<tr>
<td>Language</td>
<td>Bay</td>
<td>Percentage</td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-----</td>
<td>------------</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>12</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>31</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Serbo-Croatian</td>
<td>23</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>23</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Other Slavic Languages</td>
<td>21</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>13</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>8</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Armenian</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Persian</td>
<td>10</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>10</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Gujarati</td>
<td>206</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>123</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>83</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Hindi</td>
<td>40</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>40</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Urdu</td>
<td>34</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>34</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Other Indic languages</td>
<td>137</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>127</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>10</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Other Indo-European Languages</td>
<td>49</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>24</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>25</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Chinese</td>
<td>209</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>65</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>144</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Japanese</td>
<td>138</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>49</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>89</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Korean</td>
<td>232</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td>89</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td>143</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Mon-Khmer, Cambodian</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Language</td>
<td>Bay</td>
<td>Percentage</td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-------</td>
<td>------------</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Hmong</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Thai</td>
<td>130</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>71</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>59</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Laotian</td>
<td>48</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>48</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Vietnamese</td>
<td>1,019</td>
<td>0.6%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>567</td>
<td>0.3%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>452</td>
<td>0.3%</td>
<td></td>
</tr>
<tr>
<td>Other Asian languages</td>
<td>236</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>197</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>39</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Tagalog</td>
<td>504</td>
<td>0.3%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>342</td>
<td>0.2%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>162</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td>Other Pacific Island languages</td>
<td>48</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>25</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>23</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Navajo</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Other Native American languages</td>
<td>19</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>19</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Hungarian</td>
<td>66</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>34</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>32</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Arabic</td>
<td>197</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>132</td>
<td>0.1%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>65</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Hebrew</td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Speak English less than “very well”</strong></td>
<td>0</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>African languages</td>
<td>59</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Bay</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
<td>-----</td>
<td>-----</td>
<td>----</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td></td>
<td>53</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td></td>
<td>6</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other and unspecified languages</td>
<td></td>
<td>16</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English “very well”</td>
<td></td>
<td>16</td>
<td>0.0%</td>
</tr>
<tr>
<td>Speak English less than “very well”</td>
<td></td>
<td>0</td>
<td>0.0%</td>
</tr>
</tbody>
</table>