

**RESOLUTION 2013 - 160**

**A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, APPROVING THE 2013 ST. JOHNS COUNTY TITLE VI PLAN AS AUTHORIZED BY MOVING AHEAD FOR PROGRESS IN THE 21<sup>ST</sup> CENTURY (MAP-21), PUBLIC LAW 112-141**

**WHEREAS**, the Federal Transit Administration has been authorized under Chapter 53, Title 23 United States Code to award federal public transportation assistance; and

**WHEREAS**, St. Johns County as a designated recipient is authorized to receive public transportation assistance funding from the FEDERAL TRANSIT ADMINISTRATION; and

**WHEREAS**, as the recipient of FEDERAL TRANSIT ADMINISTRATION FUNDING St. Johns County is required to maintain a Title VI program; and

**WHEREAS**, St. Johns County must have an approved Title VI Plan that addresses how the Title VI program will be carried out; and

**WHEREAS**, The 2013 St. Johns County Title VI Plan is an update of a St Johns County Title VI plan approved by the Federal Transit Administration in 2011; and

**WHEREAS**, the Title VI plan must be updated every 3 years; and

**WHEREAS**, The 2013 St Johns Title VI plan is updated as per FEDERAL TRANSIT ADMINISTRATION Circular 4702.1B to meet the new requirements as authorized in the Moving Ahead for Progress in the 21st Century (MAP-21), Public Law 112-141; and

**WHEREAS**, a 2013 Title VI Plan (**which is attached hereto, and incorporated herein**) has been developed by the recipient; and

**WHEREAS**, new requirements in Circular 4702.1B requires a resolution from the recipient approving the Title VI Plan.

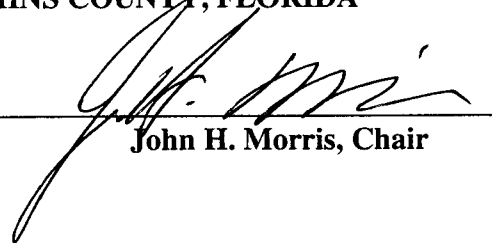
**NOW THEREFORE, BE IT RESOLVED** by the Board of County Commissioners of St. Johns County, Florida, that:

1. The above recitals are incorporated by reference into the body of this resolution and such recitals are adopted as findings of fact.
2. The Board of County Commissioners of St. Johns County approves the 2013 St. Johns Title VI Plan as presented.
3. To the extent that there are typographical or administrative errors that do not change the tenor, tone, or concept of this Resolution, then this resolution may be revised without subsequent approval of the Board of County Commissioners.

**PASSED AND ADOPTED** by the Board of County Commissioners of St. Johns County, State of Florida, this 6th day of August 2013.

**BOARD OF COUNTY COMMISSIONERS  
OF ST. JOHNS COUNTY, FLORIDA**

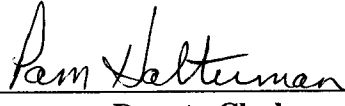
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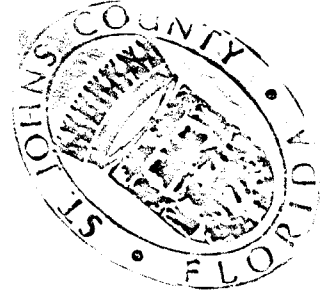
**John H. Morris, Chair**

**ATTEST:** Cheryl Strickland, Clerk

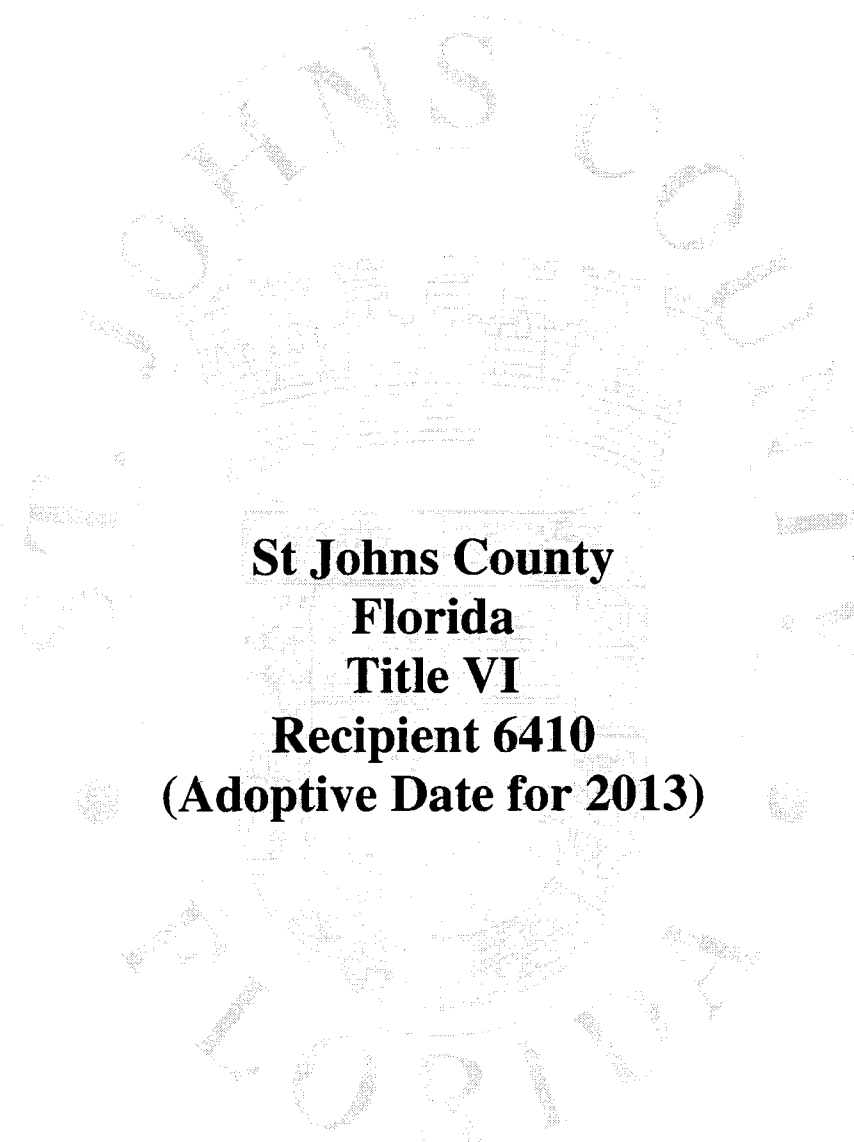
By: \_\_\_\_\_



**Deputy Clerk**



**RENDITION DATE** 8/8/13



**St Johns County  
Florida  
Title VI  
Recipient 6410  
(Adoptive Date for 2013)**

## TABLE OF CONTENTS

Notifying Beneficiaries of Protection under Title VI-----	Page 1
Title VI Policy-----	Page 1
Complaint Procedures-----	Page 1
Title VI Complaint Forms-----	Page 3
List of Title VI Complaints-----	Page 5
Transit Public Involvement Plan (Inclusive Public Involvement)-----	Page 6
LEP-----	Page 10
Four Factor Analysis-----	Page 12
Summary of Analysis-----	Page 15
Determination of LEP services Resulting from Analysis-----	Page 16
Membership of Non-Elected Committees-----	Page 18
Monitoring of Sub Recipients-----	Page 18
Title VI Equity Analysis-----	Page 18
System-Wide Standards and Policies for Fixed Route (With less than 50 vehicles/Under 200,000 in population)-----	Page 18
Service Standard Requirements-----	Page 19
Vehicle Loads-----	Page 19
Vehicle Headways-----	Page 20
On time performance-----	Page 20
Service Availability Standards-----	Page 20
Determination of Route System-----	Page 21
Effective Practices to fulfill Service Policies-----	Page 21
Vehicle Assignments for each Mode-----	Page 22

## **Notifying Beneficiaries of Protection under Title VI**

The following Title VI notice will be done through the Sunshine Bus website, the County's website, notices posted on transit vehicles, and on all future route schedules. In addition, Title VI will be included in any published public notices that involve federally funded public transportation. The rights located on the Sunshine Bus website can be translated using the translation device provided on the website.

### **St Johns County Title VI Policy**

St Johns County is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with St Johns County's public transportation provider, the St Johns County Council on Aging. For information or to file a Title VI complaint involving the public transportation system contact the St Johns County Council on Aging Director of Transportation Services at 2925 Old Moultrie Road, St Augustine Fl. 32086, Telephone (904) 209-3718.

A complainant may file a complaint directly with the Federal Transit Administration at the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE. Washington DC 20590.

### **Title VI Complaint Procedures**

If anyone believes they been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin while accessing transit services in St Johns County the following complaint procedures are available.

In filing a Title VI complaint the following information is encouraged to be submitted in writing.

- Your name, address and how to contact you (phone number, email address, etc.)
- How, why, when and where you believe you were discriminated against. Include the location, names and contact information of any witnesses. If the alleged incident occurred on the bus, give date, time of day, and bus number if available.
- You must sign your letter of complaint

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. Complaints will be first directed to the Director of Transportation Services. He or she can be contacted at 2925 Old Moultrie Road, St Augustine Fl. 32086, Telephone (904) 209-3718. In turn the Director of Transportation will contact the County Transit Grant Specialist at 4040 Lewis Speedway, St Augustine Fl. 30084, Telephone (904) 209-0630. The Transit Grant Specialist will be responsible for informing County Administration of any complaints and to keep a record of all actions concerning the complaint.

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The Director of Transportation Services will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigation officer will:

Identify and review all relevant documents, practices and procedures;

Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation, the Director of Transportation Services will complete a final report for the Executive Director with a copy to the General Counsel and St Johns County Administration. If a Title VI violation is found to exist, remedial factors as appropriate and necessary will be taken immediately. The Complainant will also receive a final report together with any remedial factors. The investigation process and final report should take no longer than twenty-five (25) business days. If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the Executive Director, 180 Marine Street, St. Augustine, FL 32084.

Complaints may also be filed with the Federal Transit Administration's Office of Civil Rights, no later than 180 days after the date of the alleged discrimination, 200 West Adams Street, Suite 320, Chicago, Illinois 60606, Phone: (312) 353-3770.

Complaint procedures are the responsibility of St. Johns County and their Transportation Provider, the St Johns County Council on Aging. The responsible persons in each organization are as follows:

St Johns County  
Personnel Services Department  
500 San Sebastian View, Room 005A  
St Augustine, FL 32084  
Tel (904) 209-0638

Council on Aging Executive Director  
180 Marine St  
St Augustine Fl 32084  
Tel (904) 209-3700

The Director of Transportation Services and the County Transit Grant Specialist shall maintain a log of Title VI complaints received from this process. The log shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken in response to the complaint.

**Title VI Complaint forms**



St. Johns County  
**Council On Aging**  
180 Marine Street  
St. Augustine, FL 32084  
904-209-3700

**Title VI Complaint Form**

If you believe that you have been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin under the St. Johns County Council on Aging, Inc.'s program of transit service delivery or related benefits, you may file a complaint with the SJCCOA Executive Director by completing this form.

Date: \_\_\_\_\_  
Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

Please describe your complaint below, including how, why, when and where you believe you were discriminated against. Include the location, names and contact information of any witnesses. If the alleged incident occurred on the bus, give date, time of day and bus number if available. Continue on the back of form if necessary.


\_\_\_\_\_  
Signature

*Send your written and signed complaint to:*  
Executive Director  
St. Johns County Council on Aging, Inc.  
180 Marine Street  
St. Augustine, FL 32084

Spanish Version



St. Johns County  
**Council On Aging**

180 Marine Street  
St. Augustine FL 32084  
904-209-3700

**Título VI Formulario de reclamación**

Si usted cree que ha sido excluidos de la participación, negó los beneficios de, o sometidos a discriminación por motivos de raza, color u origen nacional en el Consejo del condado St. Johns County Council on Aging, Inc. de tránsito prestación de servicios o prestaciones relacionadas con, puede presentar una queja con el Director Ejecutivo de SJCCOA al completar este formulario.

Fecha: \_\_\_\_\_  
Nombre: \_\_\_\_\_ Número de teléfono de \_\_\_\_\_  
Dirección: \_\_\_\_\_  
\_\_\_\_\_

Describa su queja a continuación, incluyendo cómo, por qué, cuándo y donde se cree fueron discriminados. Incluyen la ubicación, nombres e información de contacto de los testigos. Si el presunto incidente se produjo en el autobús, da fecha, la hora del día y el autobús número si está disponible. Seguir en la parte posterior del formulario si es necesario.


\_\_\_\_\_

Firma

*Enviar su queja escrita y firmada:*  
Executiva Director  
St. Johns County Council on Aging, Inc.  
180 Marine Street  
St. Augustine, FL 32084



**A list of any Title VI complaints since last submittal in 2011**

**None to list since last update in 2011**

Date of Submittal	Charge	Status
None	None	N/A

**Construction Program Requirements**

Currently no construction projects using FTA funds are underway and none are scheduled in the near future. The construction of a new transit facility was completed in October 2010. Prior to the start of that project a Categorical Exclusion of completed and approved by the Federal Transit Administration.

A copy of the FTA’s standard CE checklist is kept on file along with the NFPA 1600 document. Prior to any future projects that may come about the following will be integrated into any required analysis,

- A description of the low-income and minority population within the study area affected by the project
- A discussion of all adverse effects of the project both during and after construction that would affect the identified low-income and minority population
- A discussion of all positive effects that would affect the identified low-income and minority population, such as an improvement in transit service, mobility, or accessibility
- A description of all mitigation and environmental enhancement actions incorporated into the project to address any adverse effects
- A discussion of remaining effects, if any, and why further mitigation is not proposed
- A comparison of mitigation and environmental enhancement actions that effect predominantly low-income and minority areas

**Inclusive Public Participation**

Inclusive Public Participation for St Johns County Transit is the responsibility of both the County and the Transportation Operator who receives funding from the County for the operation of the transit system. Following is the St Johns County Transit Public Involvement Plan:



**St. Johns County**  
**Transit Public**  
**Involvement Plan**  
(Inclusive Public Participation)

## Introduction

The purpose of this Public Involvement Plan is to document the public outreach efforts. Outreach efforts are an essential part of gaining input into the functionality of the St. Johns County Transit system. The public involvement process is a multi-pronged process that will include stakeholder meetings, household telephone surveys, an on-board transit survey, and other efforts. A detailed description of these public involvement efforts is found below. As part of this plan major outreach efforts are either done yearly or once every 5 years.

## Major Public Involvement Efforts (Outreach)

Public outreach and solicitation of input regarding the Sunshine Bus transit is crucial to crafting a plan that is relevant and accurately reflects the performance of the Sunshine Bus service. The objective of the public involvement efforts proposed is to utilize multiple forms of outreach in order to effectively reach the target audience, which includes Sunshine Bus current and potential users and operators. To meet this objective, the following efforts will be undertaken:

- Stakeholder Meetings: Conduct stakeholder meetings in a group setting with the Transportation Disadvantaged Local Coordinating Board, senior citizens who use the Sunshine Bus system, and other groups such as key local officials and community leaders. **(Every 5<sup>th</sup> year)**
  
- Household Telephone Survey: A random household telephone survey will be conducted of St. Johns County residents to determine their existing awareness, opinions, and needs regarding public transportation services. At least 150 surveys will be completed. **(Every 5<sup>th</sup> year)**
  
- On-Board Transit Survey: Riders of Sunshine Bus will have an on-board survey administered to assist in identifying transit needs, desires, issues & concerns. The survey will collect detailed demographic information & travel information about Sunshine bus riders, and also assess their level of satisfaction with aspects of the Sunshine Bus Service. The survey will cover all bus routes and a minimum of 100 surveys will be completed. **(Yearly)**
  
- Survey of Council on Aging Staff & Bus Operators: Council on Aging staff & bus operators will also be surveyed regarding their perception of needs, issues, and concerns with the Sunshine Bus system. **(Yearly)**
  
- Origin / Destination Analysis: An origin-destination analysis of a sampling of trips will be conducted to determine travel patterns and peak travel times. **(Yearly)**
  
- Outreach to Limited English Proficiency (LEP) individuals: Factors will be taken to ensure that public input is solicited from LEP individuals. Specifically, four factors have been outlined to be completed: **(Yearly)**
  1. Determine the number or proportion of LEP individuals eligible to be served or likely to be served by transit.

2. Determine the frequency with which LEP individuals come in contact with transit.
3. Determine the relative importance of transit provided by St. Johns County to people's lives.
4. Assess the available resources to the transit system.

### **Outreach to Low Income and Minority Communities**

Outreach to low-income and minority communities are addressed in the following ways.

1. Outreach to low-income and minority population will be identified through the Local Coordinating Board for the Commission for the Transportation Disadvantaged. This 15 member board, consisting of stakeholders from the community who work with St Johns County disadvantaged population, can disseminate Title VI information through their daily contact with the low-income and minority populations they serve.
2. The placement of information items, such as brochures, will target areas where low-income and minority populations congregate. Local churches, community centers, the County Health Department, Worksource, Department of Children and Families, and public libraries are areas that have been identified for this purpose.
3. In the event a public meeting concerning St Johns County public transportation is required, at least one location will be within the area of the low-income/minority community. The meeting will also be held where those who wish to attend can use transit.

### **Additional Outreach**

**(Please note that the following outreach opportunities are not part of the transit public involvement plan but could be used as an avenue to initiate a Title VI complaint)**

A comprehensive method of Public Participation for St Johns County is a system we call PRIDE (Public Request Inquiry Data Exchange).

The PRIDE program is an online service that allows citizens to communicate with their local government. It is a work order system used to document complaints or issues, and then track how the County responds. Members of the public can enter an issue directly into the PRIDE system. This is how it works:

1. A citizen initiates a complaint or request (issue) by entering the information into the On-Line Request Submittal form. Citizens entering an issue may choose to provide contact information or to remain anonymous.
2. An incident number is assigned to the issue, and the issue is automatically routed to the appropriate County department.
3. The receiving department begins an investigation and notates each action it is taking to resolve the issue. Citizens may track the progress of the issue by referencing the incident number.
4. When the issue is resolved, the department marks the action as completed.

Other outreach opportunities are through public notices in newspapers, a government TV Service operated by St Johns County staff, and the St Johns County Web Site. These efforts are heavily driven by the State of Florida Sunshine Laws. Access to St Johns County can also be done through the County web site. <http://www.sjcfcl.us>



**St. Johns County**

**Board of Commissioners**

***Limited English Proficient (LEP)  
Program and Goals***

## **GENERAL REQUIREMENTS**

On August 11, 2000, the President signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

As a recipient of federal financial assistance, St Johns County must take reasonable measures to provide meaningful access to LEP individuals. Among the factors to be considered in determining what constitutes meaningful access are: (1) the number or proportion of LEP persons in the eligible service population; (2) the frequency with which LEP individuals come into contact with the program; (3) the importance of the service provided by the program; and (4) the resources available to the recipient.

### **Program Goal and Objectives**

The goal of St Johns County is to provide meaningful access to individuals who are limited English proficient (LEP) through a continuous process of the four factor analysis and to determine the most appropriate balance of providing this access compared to available services and community needs.

### **Program Objectives**

The following Objectives have been established to meet St Johns County's LEP goal.

#### Objective 1

Maintain a continuous process of determining the effectiveness of providing meaningful access to individuals who are Limited English Proficient (LEP) using the four factor analysis.

#### Objective 2

Continue to look for better ways to provide meaningful access to LEP individuals

### **Strategies in accomplishing objectives**

It must first be recognized that for this plan to be successful it must be a living document capable of adapting to the diverse environments that exist in all communities and government entities. To facilitate this, a review of LEP objectives and the four factor analysis will be accomplished at a minimum of once a year.

**REASONABILITY'S;**

The initiation of the 4 factor analysis will be the reasonability of the County's Transit Planner. The transit planner will insure the 4 factor analysis is conducted at a minimum of once a year in conjunction with the annual update of the TDP.

**Four Factor Analysis**

*Factor 1 Determine the number or proportion of LEP individuals eligible to be served or likely to be served by transit.* In determining the number or proportion of LEP individuals the most current census data will be reviewed and used. The data set to use will be P19- AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER. As a result of this factor the following was determined and is shown in the following table;

**Percentage of Population 5 Years and Older  
Who Speak a Household Language Other Than English**

Language Spoken in Household	Number of Population 5 Years and older	Percentage of Population 5 Years and older
Spanish	3,572	3.06%
Indo-European	3,275	2.81%
Asian Pacific	696	0.60%
Other	296	0.25%
Total	7,839	6.72%

From the data in the previous table the following table is presented to show the percentage of LEP individuals in St Johns County 5 years and older.

**Percentage of LEP individuals 5 Years and Older in St Johns County**

Language Spoken in Household	Number of Population 5 Years and Older	Percentage of Population 5 and older	Number of non English household population that Speak English not well	Percentage of non English household population that Speak English not well	Number of non English household population that Speak English not at all	Percentage of non English household population that Speak English not at all
Spanish	3,572	3.06%	317	0.27%	123	0.11%
Indo-European	3,275	2.81%	202	0.17%	40	0.03%
Asian Pacific	696	0.60%	62	0.05%	12	0.01%
Other	296	0.25%	0	0.00%	0	0.00%
Total	7,839	6.72%	581	0.50%	175	0.15%



**Factor 2 Determine the frequency with which LEP individuals come in contact with transit.** Completion of this factor will include results obtain in the yearly survey of transit riders. Questions in the survey will address what languages are spoken at home and ethnic heritage. The results are as follows

**Question: Do you speak any other language(s) besides English at home?**

	Number of Responses	Response Rate (%)
Yes	14	14.29%
No	74	75.51%
No Response	10	10.20%
Total County	98	100.00%

**Question; Your ethnic heritage is?**

	Number of Responses	Response Rate (%)
White	47	47.96%
Black/African American	38	38.78%
Hispanic	3	3.06%
Asian	2	2.04%
Native American	1	1.02%
Other	3	3.06%
Multiple Responses	1	1.02%
No Response	3	3.06%
Total Count	98	100.00%

**Factor 3 The importance of transit provided by St Johns County to people's lives.**

Details to determine this factor will come from several sources, including information obtained by the annual on-board survey of the transit system, demographic information from the US census and information obtained from telephone surveys and interviews of community leaders conducted once every 5 years. The results of those efforts are as follows;

**Results of Telephone Survey  
When Respondents were asked to respond to a Particular Statement**

<b>Statement</b>	<b>Strongly Agree</b>	<b>Somewhat Agree</b>	<b>Neither Agree nor Disagree</b>	<b>Somewhat Disagree</b>	<b>Strongly Disagree</b>
Public transportation is an important service for St Johns County residents and visitors	50%	31%	8%	5%	6%
An effective public transportation system is important for the local economy	49%	30%	7%	7%	6%
Public transportation should be improved to attract more people out of their cars to reduce congestion	58%	24%	7%	4%	7%
I would support increased taxpayer funding to improve the St. Johns County transit system	14%	33%	11%	12%	30%

Though not overwhelming, there exists a belief that transit is important to the community, but when it comes to financing improvements the support drastically drops. The results from the surveys can be split into two different categories 1) Those that actually use transit and 2) the overall population of the county.

For those who ride public transportation, it is an extremely important part of their lives because the majority of riders are transit dependent, meaning without the transit system they would be unable to perform many life sustaining functions. An affordable form of transportation will get them to work and enable them to do life sustaining things such as medical visits and grocery shopping.

For the general population of St Johns County, transit is a good idea for other people but it does not fit their particular needs. When it comes to the question of having enough importance to financially support the system the general public is unwilling to contribute.

***Factor 4 Determine the resources available to transit.***

Available resources can be determined by focusing on a yearly review of financial capabilities and assets.

As a minimum, financial capabilities will come from the county's budget and a forecast of revenues from state and federal grants.

As a minimum, an inventory of available assets will be conducted once a year to include both the County and the contracted transportation provider.

**Results of 4 Factor Analyses  
(Summary of Analysis)**

**Summary of 4 factor analysis**

In completing the analysis the following points have been noted;

1. St Johns County population does not contain a significant amount of LEP individuals. Only 0.50 percent of residents who speak another language besides English in the household can be classified as having limited English proficiency. The percentage is even lower, at 0.15 %, for those who speak no English.
2. With only 0.50 of the total County population speaking another language and only 0.15 speaking no English the contact with transit is minimal.
3. Transit is an important part of people's lives for those dependent on transit. These transit dependent people represent most of the riders of the transit system. The number of customers who are transit dependent and LEP is extremely small.
4. The resources available to reasonably provide meaningful access to transit are extremely limited. Surveys have indicated little public support to increase financial support for transit; it would be difficult to increase any services at this time. Because of this no additional LEP services can be provided above what is already offered.

The combination of a very small LEP population and the limited frequency of LEP individual coming in contact with transit make expensive options, such as an available interpreter either on staff or on call, unreasonable. This still does not relieve us of the responsibility of providing some sort of assistance for LEP individuals. Having an individual on staff who speaks Spanish that is willing to assist is an important asset that can be utilized. In addition 58 percent of all individuals identified as either not speaking English well or not at all speak Spanish. The next largest group is Indo-Europeans at 32 percent. It must also be remembered that Indo-European in itself can encompass many different languages and it would be extremely difficult if not impossible to cover all the languages that system operators might encounter.

## Determination of LEP Services

### ❖ Identified language assistance measures

- Data from the census indicates the largest non-English speaking population speaks Spanish. Of those only 0.11 percent (123 individuals) of the total County population does not speak English. These figures indicate the chance of an LEP person using transit is extremely small, however, provisions must still be made to accommodate this population. The transit provider has a Spanish speaking employee who has volunteered to perform any language assistance when needed.

### ❖ Determined vital documents for translation

- Provide notice of right to language assistance – notices in Spanish will be posted in each vehicle of a customer's right to language assistance. A notice will also be added to the Transit website. The website contains a Google link that translates the content in other languages.
- Translate Title VI complaint form – the Title VI complaint form is available in Spanish; a copy is provided in Attachment A.
- Prohibit Behavior signage – prohibited behavior signage will utilize internationally recognized symbols such as the internationally recognized symbol for no smoking.
- Important public notices – All public notices involving access to transit will be provided in Spanish.
- Documents that could deny an LEP access to service – In an evaluation of documents that could deny and LEP access to service, the following were identified along with measures to prevent access
  - ⇒ Documents or publications on how to request language assistance – The transit system will provide information in Spanish on vehicles and on the website telling customers how to obtain language assistance.
  - ⇒ Access to the website – a Google translation button is provided on the website for translations
  - ⇒ Title VI complaint form – the form is available in Spanish
  - ⇒ Public announcements – All public announcements will be provided in Spanish.
- Provide Policy Criteria for evaluating language assistance – policy criteria for evaluating language assistance will involve the following ;
  - ⇒ Evaluation of census data to determine LEP population in St Johns County
  - ⇒ Evaluation of census data to determine customers who are LEP
  - ⇒ Evaluation of staff capabilities in responding to LEP customers
  - ⇒ Evaluation of current budget to determine financial resources
  - ⇒ Evaluation of current LEP efforts
  - ⇒ Determination of future efforts to provide access to LEP customers

- Training Staff on language assistance measures – Currently staff is not trained on language assistance measures. The LEP population in St. Johns County is extremely small and, to date, there have been no requests for assistance. Staff is aware that there is an employee who can translate in Spanish if needed.
- Awareness of types of language service – Various language assistance services were researched and analyzed. One that was most economical was a link to a Google website that translates. This was initiated and is now available. As previously mentioned, a staff member who can also assist in Spanish translations is available.
- How staff and LEP customers can obtain these services – The services currently provided can be obtained by calling the transit operator or by accessing the transit website. Notices on how to do this will be posted on each transit vehicle with telephone contacts and on our website. Through periodic training staff are kept aware of all available resources.
- How to respond to LEP correspondence, callers and in person contacts – Correspondence is handled in two ways, a staff member capable of translating and available translation services that are now available on line at various sites. For callers in Spanish, a staff member fluent in Spanish will be used.
- How to respond to civil rights complaints – A complaint form has been translated and is available in Spanish. Information on complaint procedures is available on the website using the Google translation button. The complaint form is also available on line. By use of the translation link on the website, the complaint procedures are available in numerous languages. If a paper copy is requested, a staff member will print one. For verbal communications in Spanish, a staff member will translate.

## **Membership of non-elected committees**

St. Johns County has no transit-related committees. All decisions relating to the funds received from Federal funding, to include contracts with the transportation provider, are done by resolution through the St. Johns County Board of County Commissioners, an elected body.

## **Monitoring of Sub Recipients**

St Johns County does not have Sub Recipients. All public transportation is by contract with the St Johns County Council on Aging. All requirements are addressed in the contract with the provider, and compliance monitoring is handled by the county's Transit Grant Specialist in the following ways:

1. Yearly on-board surveys of riders/customers
2. Periodic unannounced riding of the system routes to insure compliance
3. A review of the contractors published Title VI policy.
4. On-site visits to the transit facility for the purpose of performing monthly vehicle inspections and to insure postings for Title VI are accurate and up to date.

To insure these tasks are completed a log is maintained and is available upon request.

## **Title VI Equity Analysis**

Construction of the county's public transportation facility was completed in October of 2010. Prior to the purchase of property and construction of this facility a categorical exclusion was submitted to FTA in December 2006 and approved by FTA. During the purchase of this property and construction of this transit facility no right of way was required and no one was displaced. There are no plans or intentions to purchase or construct any further facilities for the public transportation system.

## **System-Wide Standards and Policies for Fixed Route (With less than 50 vehicles/Under 200,000 in population)**

As the recipient of funding for local bus service, St Johns County shall not "utilize criteria of methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin. St Johns County will take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program on the grounds of race, color, or national origin.

NOTE – St Johns is a small seven route system with no need to initiate peak hour service; the consistency of service remains the same throughout the day with the frequency of service remaining constant. It is also noted that the fixed route system only operates small buses.

## Service Standard Requirements

**Note: The Sunshine Bus system does not operate any peak hour service; all service is level throughout the operating schedule.**

### Route Deviations

The St Johns County system is a Deviated Fixed Route System that will deviate  $\frac{3}{4}$  of a mile from the scheduled route if requested, as noted in the system's bus schedule. To request a route deviation, the customer may contact Customer Service one day in advance at (904) 209-3716. A \$1.00 additional fee will be charged for each route deviation.

### Bus Stops

The system is a combination of both designated bus stops and a flag down system. On February 4, 2013 the system began using bus stop signs along the US 1 corridor from State Road 16 to Wildwood Dr. . These signs were installed because of safety concerns with buses stopping with no notice along a highway where vehicle speeds are at or above 55 MPH in some areas. The remainder of the system at this time remains a flag down system. As the system grows there are plans to add additional bus stop signs.

### Vehicle loads

Year	Make	Model	GVWR	Tare Wt.	Seating cap.	Wheel Chair.	Standing	Vehicle Load
2009	Chevy	4500	17,500	13,630	18	2	4	1.4
2009	Chevy	4500	17,500	13,630	18	2	4	1.4
2009	Chevy	4500	17,500	13,630	18	2	4	1.4
2011	Chevy	3500	14,200	10,640	16	2	4	1.4
2011	Chevy	3500	14,200	10,640	16	2	4	1.4
2011	Chevy	3500	14,200	10,640	16	2	4	1.4
2011	Chevy	3500	14,200	10,640	16	2	4	1.4
2012	Chevy	4500	14,200	10,620	17	2	4	1.4
2012	Chevy	4500	14,200	10,620	17	2	4	1.4
2012	Chevy	4500	14,200	10,620	17	2	4	1.4
2012	Chevy	4500	14,200	10,620	17	2	4	1.4

### Vehicle Headways

Route	Headway
Connector	60 minutes
Purple	120 minutes
Orange	45 minutes
Blue	45 minutes
Red	45 minutes
Green	45 minutes
Teal	120 minutes

### On Time Performance

The Sunshine Bus system has an on time performance standard of 90 percent, the standard defined as arriving at a time point no earlier or later than 10 minutes from that scheduled time point. It is also noted that a bus must never depart a time point ahead of the posted scheduled time. Time points are those stops designated/noted in the system route schedule.

### Service Availability Standards

Standards are based on two categories of service: flag down and designated bus stops. As previously noted, this is a deviated fixed-route system.

#### Flag Down System Information

The Sunshine Bus system is a developing system that has steadily grown. To facilitate ease of use, a flag down system is available on the majority of the system's routes. A bus may be flagged down as long as the following requirements are adhered to;

1. The rider must be in a safe spot for the bus to stop. The first choice, WHEN POSSIBLE, is where the bus can pull off the road.
2. If the rider is not in a safe area for the bus to stop the driver will stop at the safest stopping location.
3. The bus will only stop if the rider is on the same side of the road in the direction of travel of the bus.
4. There are some NO STOP ZONES where it has been designated unsafe to stop for passengers. Those NO STOP ZONES are;
  - a. Cordova St. past the Olde City Restaurant, the corner of Cordova St and King St.
  - b. State Road 312
  - c. Turn Lanes
  - d. When the bus is stopped at a red light or STOP sign and unable to pull over.

#### Routes with designated bus stops



The Sunshine Bus has been a flag-down system since its inception; however, a significant increase in the county's population resulted in increased traffic on several major corridors. For this reason, designated bus stops have been placed in areas deemed too dangerous for flag-down service. With the installation of bus stop signs the following standards for availability have been established.

1. Whenever possible signs will be placed after an intersection to allow passengers to more safely board and alight the vehicle. This also allows the vehicle easier entry back into traffic.
2. Signs will not be placed in a turning lane.
3. Signs will be no greater than ½ a mile apart and no closer than ¼ mile.
4. Whenever possible the sign will be at or near an established sidewalk

#### Determination of Route Systems

Five of the current seven routes have been established since 2001 and remain largely unchanged. These routes, known as the Red, Green, Orange, Purple and Blue Lines, were established initially by the St Johns County on Aging, the Community Transportation Coordinator (CTC) as designated by the State of Florida Transportation Disadvantaged Board. This was prior to St Johns County receiving FTA funding as a recipient. The first FTA funding was received after October 2004.

Two additional routes, the Purple and the Connector Lines, were established with funding from an urbanized Job Access and Reverse Commute (JARC) Grant through the Jacksonville Transportation Authority. The Teal Line was established with funding from a rural Job Access and Reverse Commute (JARC) through FDOT.

Additional routes will be identified and implemented as funding becomes available. The establishment of any future routes, and the enhancement of current routes, will be based on directives outlined in the county's Transit Development Plan (TDP), as mandated by the State of Florida. The TDP receives a major update every five years and minor updates annually. Components of this plan include; demographic information, public involvement to include public meeting and surveys, an evaluation of existing services, an assessment of transit demand needs, and a 10 year financial plan. The TDP establishes goals and objectives, using the following process, to include future routes and enhancements of current routes.

#### Effective Practices to fulfill the service policy

Distribution of transit amenities

Current transit amenities for the Sunshine Bus system include 13 shelters and 52 bus stop signs.

As previously noted, the 52 bus stop signs were installed due to safety concerns along US 1 and other heavily trafficked corridors. Additionally, generators and attractors used by riders identified in the TDP were factors used to determine the location of bus stop signs. Sites identified for bus sign placement are reviewed by a County Transportation Engineer to insure all Department of Transportation requirements are met.

A bus shelter study was performed to identify the location of the current bus shelters. That study consisted of;

1. A Review Team from various disciplines in each affected jurisdiction
2. A review of Local Plans and Codes; particularly the St. Johns County TDP
3. The establishment of placement criteria
4. The design of a shelter prototype
5. ADA accessibility
6. The establishment of proposed locations

The TDP is the primary indicator of bus shelter locations and addition of other amenities. The elements of demographic information, public Involvement to include public meeting and surveys, an evaluation of existing services, an assessment of transit demand needs, and a 10 year financial plan will be the basis for all amenity decisions.

#### Vehicle assignment for each mode

The Sunshine Bus is a single mode system utilizing small cutaway buses exclusively. There are no plans to add larger vehicles to the transit fleet. Vehicle mileage and availability due to maintenance requirements will be the major determination in assigning vehicles. Currently one ADA-compliant vehicle is assigned to each route.

## **Board Resolution Approving Title VI plan**