



ESCAMBIA COUNTY AREA TRANSIT

TITLE VI PROGRAM 2023-2025



Escambia County Area Transit
1515 W. Fairfield Drive
Pensacola, FL 32501



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Introduction

Escambia County Area Transit (ECAT), the Mass Transit Department of Escambia County Government, as the public transportation provider for Escambia County, is required to submit a Title VI update to the Federal Transit Administration (FTA). This update includes the level and quality of transit service provided for minority and low-income areas and system-wide environmental justice policies and procedures, pursuant, as amended Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," published October 1, 2012. The objectives of FTA's Title VI Program are to:

Ensure that the level and quality of public transportation service are provided in a nondiscriminatory manner.

- *Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.*
- *Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.*

This report is submitted to the FTA every three years and is intended to demonstrate compliance with Title VI. This report will detail policies and procedures for ensuring Title VI compliance, including key contacts, policies, and procedures.

Although challenges have been encountered due to economic conditions, financial constraints, and other externalities, ECAT works to continually provide the best transit service possible to Escambia County in a fair and equitable manner.

Title VI Program Checklist

Table 1 identifies the Title VI Program reporting requirements described in FTA Circular 4702.1B and notes the associated page numbers in this report. The checklist follows the outline found in the circular and includes general requirements for all recipients of Federal funding assistance and all fixed-route transit and paratransit providers.

Table 1: Federal Title VI Program Requirements

	Requirement	Page Number
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1	Title VI Notice to the Public, including list of locations where notice posted	7; Appendix D
2	Title VI Complaint Procedures	8
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Escambia County Area Transit Title VI Program Policy Statement

Escambia County Area Transit (ECAT), the Mass Transit Department of Escambia County and the provider of public transportation in Escambia County, whose purpose is to deliver quality public transportation services to the public and whose employees have extensive daily contact with the public, recognizes its responsibility to the community it serves and is committed to a policy of non-discrimination. Governed by the Escambia County Board of County Commissioners and serving the City of Pensacola, the Town of Century, and other unincorporated areas of Escambia County, ECAT complies with Title VI of the Civil Rights Act. It is ECAT's policy to ensure non-discriminatory transportation practices throughout Escambia County.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that *"no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance"* (42 U.S.C. Section 2000d).

The Environmental Justice (EJ) component of Title VI guarantees fair treatment for all people regardless of race and income. The requirements under EJ include ECAT identifying and addressing, as appropriate, any potential disproportionate and /or adverse impact of its programs, policies, and activities on minority and low-income populations. In addition to EJ considerations in public transit administration, ECAT in accordance with Executive Order 13166, will undertake reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to programs, services, and information.

The three fundamental Environmental Justice concepts are:

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

The Escambia County Area Transit Title VI Plan is consistent with the Escambia County Title VI Plan dated January 5, 2023. The Human Resources Director has been designated to ensure compliance with Equal

Employment Opportunity (EEO) regulations and is responsible for investigating employment complaints at the county level. In addition to Escambia County's HR Director, ECAT's Civil Rights Officer is responsible for civil rights compliance and monitoring to ensure the non-discriminatory provision of transit services and programs. In addition, the Civil Rights Officer is responsible for implementing all aspects of the Title VI Program. However, along with the Mass Transit Director, all managers, supervisors, and staff are responsible for making ECAT's Title VI Program successful. Implementing the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by ECAT in its financial assistance agreements with the U.S. Department of Transportation (DOT).



Wesley J. Moreno
County Administrator



Date

Section 1: General Requirements

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

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

In accordance with 49 CFR 21.9(d) and guidance provided in FTA Circular 4702.1B Chapter III-4, ECAT's Title VI Notice of Rights (Notice) includes:

1. A statement that the ECAT operates programs without regard to race, color and national origin.
2. A description of the procedures members of the public should follow in order to request additional information on ECAT's nondiscrimination obligations.
3. A description of the procedure members of the public should follow in order to file a discrimination complaint against ECAT.

Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Escambia County Area Transit'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 public areas of ECAT office(s) including the reception area and meeting rooms at the Rosa Parks Center, 1515 W Fairfield Drive, Pensacola FL. ECAT has a Title VI Notice to the Public on its website (www.goecat.com) and on transit vehicles.

ECAT's Title VI Notice to the Public is provided in Appendix D of this Plan. The Notice to the Public is translated into Spanish, consistent with LEP Guidance, and is also provided in Appendix D.

2. ECAT Title VI Complaint Procedure

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 member of the public.

The following English and Spanish versions of the ECAT Title VI complaint procedures are posted on the ECAT website and are following Title VI requirements.

ECAT Title VI Complaint Procedures

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin (under Title VI of the Civil Rights Act of 1964, as amended), by Escambia County Area Transit (ECAT), may file a Title VI complaint by completing and submitting an ECAT Title VI Complaint Form. The following procedures will be followed to investigate formal Title VI complaints:

1. Filing of Title VI Complaints of Discrimination

Complaints can be submitted in person, postal mail, or received by email, with contact information. Escambia County Area Transit investigates complaints received no more than 180 days after the alleged incident. Escambia County Area Transit will only process complaints that are complete. To be considered complete, complainants must, at a minimum, include their name, contact information, date of the alleged incident, and a descriptor.

Complaints should be in writing, signed by the complainant or his/her representative(s), and must include the complainant(s) name, address, and telephone number. Allegations of discrimination received via email will be acknowledged and processed. The complaint form can be accessed on the website: www.goecat.com or the complainant may call (850) 595-3228 to obtain a complaint form.

Signed complaint forms should be submitted to:

Escambia County Mass Transit Department
Attention: Angela Walden, ECAT Title VI Program Coordinator
1515 West Fairfield Drive
Pensacola, FL 32501
850-595-3228

2. Complaint Investigation

Once the complaint is received, ECAT will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter, within five (5) working days, informing him/her whether our office will investigate the complaint.

Escambia County Area Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Escambia County Area Transit may contact the

complainant. The complainant has ten (10) business days from the date of the letter to send the 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 ten (10) business days, Escambia County Area Transit can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

3. Disposition

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was no Title VI violation and that the case will be closed. A LOF 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, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure is available to the public on Escambia County Area Transit's website (www.goecat.com), and at the ECAT administrative office, 1515 W Fairfield Drive, Pensacola FL.

If the complainant disagrees with the decision rendered by ECAT, he/she will be notified of the right to request reconsideration within thirty (30) days, or to file a complaint with the Federal Transit Administration (FTA) Office of Civil Rights, at the following address:

Federal Transit Administration, Region IV
Office of Civil Rights
230 Peachtree Street, N.W. Suite 800
Atlanta, GA 30303
Telephone: (404) 865-5600

4. Retaliation

Retaliation is prohibited under Title VI of the Civil Rights Act of 1964, as amended. It is the policy of Escambia County Government that persons filing a complaint of discrimination should have the right to do so without interference, intimidation, coercion, or fear of reprisal. Anyone who feels he/she has been subjected to retaliation should report such an incident to the ECAT Title VI Program Coordinator, Escambia County Transit, 1515 West Fairfield Drive, Pensacola, FL 32501, or call 850-595-3228.

ECAT título VI procedimientos de queja

Cualquier persona que crea que ha sido discriminado en base a raza, color o origen nacional (bajo el título VI de la ley de derechos civiles de 1964, en su forma enmendada), por la división de tránsito de área del Condado de ESCAMBIA (ECAT), puede presentar un Queja del título VI completando y presentando un formulario de queja del título VI del ECAT. Se siguen los siguientes procedimientos para investigar las quejas formales del título VI:

1. Presentación del título VI quejas de discriminación

Las quejas pueden ser enviadas en persona, correo postal, o recibidas por correo electrónico, con información de contacto. Escambia County Área Tránsito investiga quejas recibidas no más de 180 días después del presunto incidente. Escambia County Área Tránsito solo procesará las quejas que estén completas. Para ser considerado completo, los reclamantes deben, como mínimo, incluir su nombre, información de contacto, fecha de presunto incidente, y una descripción del incidente.

Las quejas deben ser por escrito, firmadas por el denunciante o sus representantes, y deben incluir el nombre, la dirección y el número de teléfono del reclamante (s). Las denuncias de discriminación recibidas por correo electrónico serán reconocidas y procesadas. El formulario de queja puede ser accedido en el sitio web: www.goecat.com, o el reclamante puede llamar (850) 595-3228 para obtener un formulario de queja.

Los formularios de queja firmados deben presentarse a:

La división de tránsito masivo del Condado de Escambia
Atención: Ángela Walden, Coordinador del programa del título VI del ECAT
1515 West Fairfield Drive
Pensacola, FL 32501
850-595-3228

2. Investigación de quejas

Una vez recibida la queja, ECAT la revisará para determinar si nuestra oficina tiene jurisdicción. El reclamante recibirá una carta de acuse de recibo, en un plazo de cinco (5) días hábiles, informándole si la queja será investigada por nuestra oficina.

Escambia County Área Tránsito tiene 90 (90) días para investigar la queja. Si se necesita más información para resolver el caso, Escambia County Área Tránsito puede ponerse en contacto con el denunciante. El reclamante tiene diez (10) días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el denunciante o no recibe la información adicional dentro de diez (10) días hábiles, Escambia County Área Tránsito puede administrativamente cerrar el caso. Un caso también puede cerrarse administrativamente si el denunciante ya no desea proseguir su caso.

3. Disponible

Después de que el investigador revisa la queja, emitirá una de dos cartas al reclamante: una carta de cierre o una carta de hallazgo (LOF). Una carta de clausura resume las alegaciones y declara que no había una infracción del título VI y que el caso se cerraba. Un LOF resume las acusaciones y las entrevistas sobre el presunto incidente, y explica si se producirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción. Si el denunciante desea apelar la decisión, tiene siete (7) días para hacerlo desde el momento en que recibe la carta de cierre o la LOF.

El procedimiento de queja se hace disponible al público en el sitio web de Escambia County Área Tránsito (www.goecat.com), y en la oficina administrativa de ECAT, 1515 W Fairfield Drive, Pensacola FL.

Si el reclamante no está de acuerdo con la decisión dictada por ECAT, se le notificará el derecho a solicitar la reconsideración dentro de los treinta (30) días, o a presentar una queja ante la oficina de derechos civiles de la administración federal de tránsito (TLC), en los siguientes Dirección:

Administración Federal de tránsito, región IV
Oficina de derechos civiles
230 péchate, Street, n. w. Suite 800
Atlanta, GA 30303
Teléfono: (404) 865-5600

4. Represalia

La represalia está prohibida en virtud del título VI de la ley de derechos civiles de 1964, modificada. Es la política del gobierno del Condado de Escambia que las personas que presenten una queja de discriminación deben tener el derecho de hacerlo sin interferencia, intimidación, coerción o temor a represalias. Cualquiera que sienta que ha sido sometido a represalias debe reportar dicho incidente al Coordinador del programa del título VI del ECAT, Escambia County Tránsito, 1515 West Fairfield Drive, Pensacola, FL 32501, o llame al 850-595-3228.

3. Title VI Complaint Form

The ECAT Title VI complaint form and associated procedures are available in English and Spanish in Appendix E of this plan and on the ECAT website (www.goECAT.com).

4. List of 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), Escambia County Area Transit 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 Escambia County Area Transit 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 the FDOT and FTA.

ECAT did not have any Title VI investigations, complaints, or lawsuits during past three (3) years.

Civil Rights Compliance Review Activities

In 2019, FTA Region IV conducted a triennial review of ECAT for compliance with all FTA requirements. Results of the review were submitted to ECAT in July 2019, with responses and necessary corrective action provided by ECAT within an appropriate amount of time.

5. 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 Escambia County Area Transit was developed to ensure that all members of the public, including minorities, disabled persons, and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Escambia County Area Transit. 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 Escambia County Area Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The ECAT PPP is included as Appendix F to this Title VI Plan.

In accordance with the ECAT Public Participation Program in Appendix F, these Title VI Public Involvement Administrative Operating Procedures have been developed to ensure proper public input to the development and implementation of ECAT services.

There are two types of activities for which procedures are established:

- Activities that require public participation based on Federal and/or State regulations; and
- Activities that ECAT desires public participation, in as part of its overall strategy to provide transportation services.

In executing this policy, ECAT will publish in a newspaper of general circulation, a notice of activities that impact ECAT's riding and non-riding customers. Notice will be published within twenty-one (21) days in advance of the time when the activity is to be implemented.

The notice shall include:

- The proposed activity (ies);
- Address and business hours whereby information regarding the activity (ies) is available for public review;
- Availability of opportunities to verbally comment regarding one or more of the activities during the regularly scheduled Board Meeting and/or any special meeting;
- A period in which the public may comment on the proposed activity (ies);
- A contact address for the submission of written comments related to the activity(ies);
- Contact information to arrange special accommodations.

Where appropriate, ECAT will proactively solicit public participation on one or more than one activity so long as there is at least fourteen (14) days before any one of the activities

are to be implemented. Any public request for a hearing or comment on a particular activity will have no bearing on the implementation of any other activity (ies).

Public Hearing Guidelines:

Public Hearings to solicit public comment will be automatically held under the following circumstances:

- *When required by Federal or State regulations;*
- *When service reductions take place such that any of the following conditions are met:*
- *An entire route or set of routes are eliminated except for planned service development or experimental service in existence for less than 2 years.*
- *Any service reduction impacting more than 20% of an individual route's total service hours, as determined by the Mass Transit Director in coordination with the Title VI Officer.*
- *When passenger fares and/or fare media are proposed to be increased or decreased beyond current pricing levels. This includes all ECAT services requiring a fare.*
- *Once annually to review the Program of Projects.*

All public comments, written and oral regarding the Program of Projects, will be presented to the Escambia Board of County Commissioners at a regularly scheduled meeting before final action on the activity (ies) is taken.

Below are specific activities that warrant public involvement for the two types of activities.

Fare Increase:

Fixed route fare increases are increases in the base system, full adult fare. When the full fare is increased, discount fares, fare media, commuter services, and paratransit fares may also be increased at the same time. ECAT staff will evaluate information such as revenue forecasts, expected shortfalls and fare studies to determine if a fare increase is warranted. Once the fare increase process is initiated, ECAT shall proceed with public notification of the proposed fare increase, following Title VI requirements.

Service Reductions:

Service Reductions occur when ECAT does the following to an individual route or a set of routes:

1. *Reduces service by more than 20% of an individual route's total service hours.*
2. *Eliminates a route altogether, unless the route is a service development or experimental service or has not been in existence for more than 2 years.*

Fare Changes & Service Reductions – Required Activities:

Public participation is required if the fare increase process is initiated or any of the above activities impact more than 20% of an individual route's total service hours as determined by the Mass Transit Director in coordination with the Title VI Officer. When the Mass Transit Director deems that one or both of the criteria have been met, the following activities shall occur:

- *Post fourteen (14) days' notice in the form of press releases, on-board bus cards, and flyers posted on ECAT website, and fixed route and/or paratransit vehicles.*
- *Schedule a public hearing(s) with fourteen (14) days' notice with information for public comment.*
- *Notice of public hearing in accordance with Public Notices Procedures below.*
- *Hold public hearing(s) to gain public input.*

Other Optional Activities Related to Fare Change or Service Reductions:

When deemed appropriate and reasonable, the ECAT Staff may also elect to conduct other activities to solicit public comment, including but not limited to:

1. *Hold public workshops in communities affected by the fare change or service reductions.*
2. *Make presentations to elected officials and local jurisdictions.*
3. *Make presentations to business and community groups.*
4. *Publicize the fare change or service reduction through marketing promotions on radio and television stations.*

ECAT Program of Projects (Capital Investments) – Required Activity:

Capital investment and/or improvement projects shall be programmed in the annual update of the ECAT Transit Development Plan (TDP) and/or budget workshops, the Florida-Alabama Transportation Planning Organization (TPO) and their Transportation Improvement Program (TIP). The TPO provides their own process for early consultation and public participation to citizens, affected public agencies, and representatives of transportation agencies, private providers of transportation, and other interested parties and local jurisdictions concerns.

FL- AL TPO staff presents all key issues to its Technical Advisory Committee, Citizen Advisory Committee, and the Florida-Alabama Transportation Planning Organization, which are comprised of jurisdictional staff, private citizens and elected officials in the urban area. Public hearings are also held on the Long-Range Transportation Plan and the Transportation Improvement Program prior to adoption by the MPO. The ECAT's public participation activities will be in coordination with FL-AL TPO's most current Public Involvement Program regarding transit funding and activities, as identified in the Unified Planning Work Program (UPWP).

The ECAT public participation process in the form of public workshop(s) for capital investments/improvements will be as follows:

1. *Once annually, ECAT will develop a Program of Projects (POP) proposed to be funded with Federal, State and local funding. The POP are derived from the TDP.*
2. *ECAT will publish notice of the POP's availability in a newspaper of general circulation. The publication will also solicit public feedback on the POP.*
3. *The POP will be adopted by the Escambia Board of County Commissioners.*
4. *The POP shall then be submitted to the Florida Department of Transportation (FDOT) for incorporation into the Work Program and the TPO for incorporation into the TIP.*

5. *The TPO then completes a public involvement process that includes consulting with technical and citizens committees, holding a public hearing, and final adoption by the TPO Board.*

Public comments received on the POP or TIP will be considered by ECAT throughout the adoption process and incorporated into its final programs.

Public Notice:

When formal public notice is warranted for public hearings, ECAT shall publish notice within twenty-one (21) days prior to the proposed action(s). Notice shall be published in newspapers of general circulation.

Should the hearing be for the purpose of route reduction, ECAT may opt to assign staff, where deemed appropriate and available, to act as "living alerts" and notify the public of the hearing and to distribute comment cards. This will be considered optional and is not part of the overall policy and procedure.

The notice shall include:

1. *Purpose of the public hearing*
2. *The date, time and location of the public hearing.*
3. *Address and business hours whereby information regarding the action can be available for public review.*
4. *Contact address and period of time which written public comments will be received, and;*
 - a. *Contact telephone number for the public to gain additional information.*
 - b. *Contact information for persons needing special accommodations.*

Public Comments:

It is ECAT desire to solicit public input regarding mobility services, amenities, routing, fare structure, and fare media. In order to maximize the public's opportunity to comment and become part of the official public record, ECAT will implement the following public comment procedure:

1. *The public comment period will encompass the date of the initial advertisement and until seven days after the date of the final workshop(s) or hearing(s).*
2. *Comments will be afforded:*
 - a. *Via the ECAT website at www.goECAT.com.*
 - b. *In person at the workshop(s) or hearing(s).*
 - c. *Via comment cards available at ECAT office, 1515 W Fairfield Dr., Pensacola FL.*
 - d. *To a Customer Service Representative by calling (850) 595-3228 during regular ECAT Customer Service business hours.*
 - e. *Via regular mail or delivery service.*

Public Outreach Techniques

Public outreach is not required but desired by ECAT and may take various forms and be tailored to the specific activity involved. Public outreach activities are designed to increase public awareness of ECAT, determine public attitudes regarding ECAT's progress, and to gain public consensus and support for the importance of public transportation to the quality of life in the region. ECAT will seek to maintain a comprehensive and continuous public participation outreach which is listed in the Public Participation Plan in the Appendix F.

6. Meaningful Access to LEP Persons

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).

Executive Order 13166 of 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. 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, and information, and other important portions of their programs and activities for individuals who are LEP. These provisions are included in FTA Circular 4702.1B in paragraph 9 of Chapter III.

As a public transportation provider receiving Federal funding from FTA, Escambia County has a responsibility under Title VI of the Civil Rights Act of 1964 to take reasonable steps to ensure that LEP persons have meaningful access to benefits, services, information, and other important programs and activities provided by ECAT. LEP persons include individuals who have a limited ability to read, write, speak, or understand English. Many LEP persons rely on public transit services to achieve greater mobility and access to employment. Creating a positive environment for LEP persons may help to retain existing riders and attract new riders who otherwise would be excluded based on language barriers. The DOT developed LEP guidance to assist public transit agencies in determining the best ways to comply with the statutory and regulatory LEP obligations. Transit agencies should conduct a "four-factor analysis" to determine the specific language services that are appropriate to provide as part of the recipient's Language Assistance Plan.

Four-Factor Analysis Framework

The four-factor framework consists of the four steps that assist transit agencies in developing a cost-effective mix of language assistance measures. The factors that should be considered during the LEP needs assessment include:

- *Number or proportion of LEP persons eligible to be served or likely to be encountered in the eligible service area population;*
- 1. *Frequency with which LEP persons encounter the agency's programs, activities, and services;*
- *Nature and importance of the programs, activities, and services to LEP persons; and*
- 2. *Resources available to recipient for LEP outreach, as well as costs associated with the outreach.*

Escambia County Area Transit has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis framework to develop its Language Assistance Plan (LAP). The results of the four-factor analysis are included and a part of the LAP as Appendix G.

7. Minority Representation on Non-Elected Committees and Councils

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.

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

The local transit-related, non-elected committee; Escambia County Mass Transit Advisory Committee (MTAC) consist of fourteen (14) members, with two members appointed by each County Commissioner, one member appointed by the County Administrator, one member appointed by the Mayor of the City of Pensacola, one member appointed by the Pensacola City Council, and one member appointed by the Mayor of the Town of Century. Committee members' terms shall run concurrently with the term of the County Commissioner or the Mayor who appointed them. The Committee member appointed by the County Administrator shall serve a term of four years. Currently, there are eight (6) members appointed to the committee with six (8) vacancies, as of January 2023. Listed below in Table 2 is the breakdown of minority representation among MTAC.

*Table 2: Racial Composition of Non-elected Committee- MTAC**

<i>Racial Composition of Escambia County MTAC</i>	
<i>Category</i>	<i>MTAC</i>
<i>White</i>	<i>50%</i>
<i>Black or African American</i>	<i>50%</i>
<i>Hispanic or Latino</i>	<i>--</i>
<i>American Indian and/or Native Alaskan</i>	<i>--</i>
<i>Asian</i>	<i>--</i>
<i>Native Hawaiian/Other Pacific Islander</i>	<i>--</i>
<i>Other</i>	<i>--</i>
<i>Two or more races</i>	<i>--</i>
<i>Total</i>	<i>100%</i>

*Survey Monkey Online Survey results completed by MTAC members April 29 -May 10, 2019

The Florida-Alabama Transportation Planning Organization (TPO) has three advisory committees comprised of non-elected volunteers that provide direction and advice to the MPO board on a wide range of transportation planning topics. Members of these committees are appointed by the TPO, with ECAT having no appointment authority.

Citizens' Advisory Committee (CAC) – provides a citizen's perspective on plans and programs relating to overall community needs and values to planning goals for transportation decisions; includes local community residents representing a broad spectrum of social and economic backgrounds and interests in transportation.

Transportation Disadvantaged Local Coordinating Board (LCB) – serves as an advisory board and aid in planning and approving the Transportation Disadvantaged Service Plan; includes one County Commissioner/MPO Board member as chair and citizens acting on behalf of the Transportation Disadvantaged community.

Technical Coordinating Committee (TCC) – meets to review technical matters and make recommendations concerning transportation plans and programs to the MPO Board; includes professional and technical representatives, planners, engineers, and other disciplines. The racial composition of the committees is provided below in Table 3.

Table 3: Racial Composition of MPO Non-elected Committees

Racial Composition of Florida -Alabama TPO Non-elected Committees			
Category	TCC	CAC	LCB
White	11%	38%	82%
Black or African American	4%	8%	14%
Hispanic or Latino	--	--	--
American Indian and/or Native Alaskan	--	8%	4%
Asian	--	--	--
Native Hawaiian/Other Pacific Islander	--	--	--
Other	--	--	--
Two or more races	--	--	--
Information not provided*	85%	46%	N/A
Total	100%	100%	100%

Note:- Some committee members elected not to respond to the survey sent by Florida-Alabama TPO Staff.*

Minority Representation on Decision-Making Bodies

ECAT will continue to utilize the Mass Transit Advisory Committee (MTAC) if applicable, supplement with the Florida-Alabama Transportation Planning Organization (TPO) process for decision-making and will encourage diversity on these committees.

8. Sub-Recipient Compliance with Title VI

Title 49 CFR Section 21.9(b) states that "if a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part." The primary recipient has a responsibility to provide assistance to and monitor sub-recipients for compliance with USDOT's Title VI regulations. If the sub-recipient is not in compliance, then the primary recipient (ECAT) is also not in compliance.

Sub-recipient Assistance and Monitoring

ECAT currently has no sub-recipients that meet this requirement. If/when this change, ECAT will monitor any sub-recipient to ensure it meets all applicable Federal and State regulations. As a sub-recipient to FDOT, Escambia County Area Transit utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed.

Contractors and Subcontractors

ECAT 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. ECAT, 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.

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:

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.

Nondiscrimination: The Contractor, with regard to the work performed during the contract, shall not discriminate based on 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 Appendix B of the Regulations.

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.

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.

Sanctions for Noncompliance: In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Escambia County Area Transit shall impose contract sanctions as appropriate, including, but not limited to:

- *withholding of payments to the Contractor under the contract until the Contractor complies, and/or*
- *Cancellation, termination or suspension of the contract, in whole or in part.*

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 Escambia County Area Transit, 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 the Public Transportation Grant Agreement (PTGPA) with FDOT, Escambia County Area Transit 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. Escambia County Area Transit and its contractor and subcontractors shall not discriminate based on 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 this 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, vendors and contractors of Escambia County Area Transit 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 Escambia County Area Transit. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Escambia County Area Transit 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 Escambia County Area Transit.

9. Transit 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, Appendix 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.

Escambia County has not recently constructed any facilities, nor does it currently have any facilities in the planning stage in the past three years using Federal funding that have required an equity analysis. Therefore, Escambia County and ECAT does not have any Title VI Equity Analysis reports to submit with this Plan.

10. Approval of Title VI Documentation

The Title VI Program was approved and adopted by Escambia Board of County Commissioners, FL, during a meeting held March 2, 2023. A copy of the meeting minutes and FDOT concurrence letter, and FTA concurrence letter, will be included in Appendix C of this document, after they are received.

Section 2: Program Specific Requirements

Chapter IV of FTA Circular 4702.1B provides program-specific guidance for all transit providers that operate fixed-route services.

Service Standards

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.

FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system and must ensure that the manner of the distribution affords users access to these assets.

Service standards and policies have been set for each mode of service operated by Escambia County, including local fixed-route bus, express (commuter) bus service, and Escambia County Community Transportation (ECCT) paratransit demand response service. ECAT has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination based on race, color, or national origin.

Quantitative standards for vehicle load, vehicle headways, on-time performance, and service availability are listed below. These standards are the desired targets for ECAT and any deviation from the standard will be reviewed in accordance with the monitoring program to ensure adequate and equitable system performance. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

1. Vehicle Load

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

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

Table 4: ECAT Vehicle Load Factors

ECAT Vehicle Load							
Vehicle Type	Average Passenger Capacities			Maximum Vehicle Load		Maximum Load Factor	
	Seated	Standing	Total	Off-Peak	Peak	Off-Peak	Peak
26' Standard Cutaway - GMC	16	6	22	16	22	1.0	1.4
26' Standard Cutaway - Chevy	24	8	32	24	32	1.0	1.3
29' Standard Bus - Champion	22	6	28	22	28	1.0	1.3
29' Standard Bus - Gillig	28	12	40	28	40	1.0	1.4
30' Standard Bus - Gillig	29	21	50	29	50	1.0	1.7
32' Standard Bus - El Dorado	29	19	48	29	48	1.0	1.7
40' Standard Bus - Gillig	35	21	56	35	56	1.0	1.6
36' Standard Trolley - Supreme	32	14	46	32	46	1.0	1.4
36' Standard Trolley - Classic	43	14	57	43	57	1.0	1.3

Paratransit vehicles hold 12–26 seated passengers. Paratransit vehicle load will not exceed available seating capacity at any time. capacities, which are described in Table 5.

Table 5: ECCT Vehicle Load Factors

ECCT Vehicle Load						
Vehicle Type	Average Vehicle Passenger Capacities				Maximum Vehicle Load	Maximum Load Factor
	Seated	Wheelchair	Driver	Total	Peak	Peak
20.5' Standard Van - Chevy 3500	14	0	1	15	15	1.0
17' Standard Van - Dodge Caravan	3	1	1	5	5	1.0
17' Standard Cutaway - Chevy 4500	8	2	1	11	11	1.0
22' Standard Cutaway - Chevy 4500	8	2	1	11	11	1.0
23' Standard Cutaway - Chevy 4500	14	3	1	16	16	1.0
22' Standard Cutaway - Chevy 3500	8	2	1	11	11	1.0
22' Standard Cutaway - Ford Transit	8	2	1	11	11	1.0

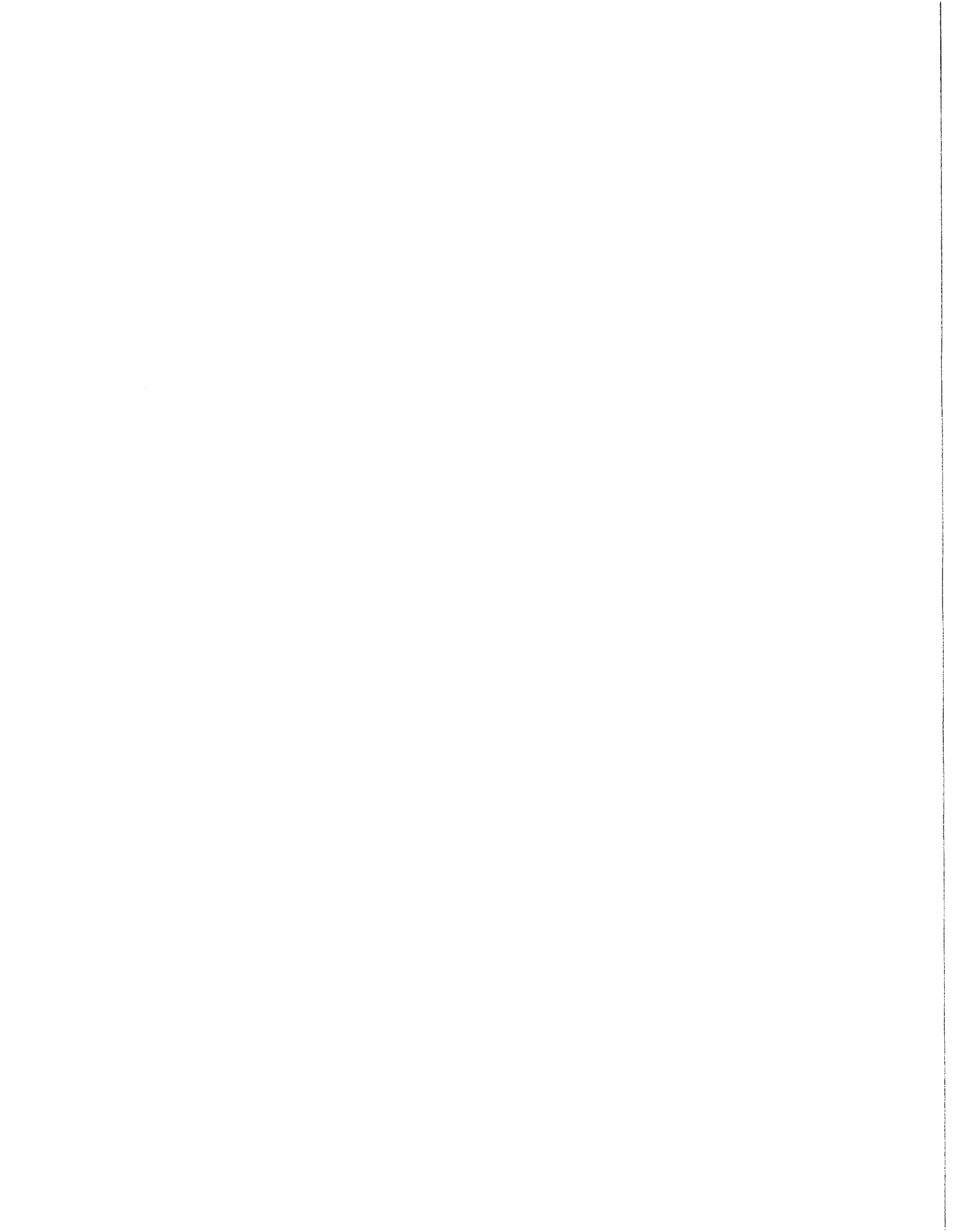
2. Vehicle Headways

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given bus route or combination of bus routes. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., 4 buses per hour). The current ECAT service span is shown in Table 6.

Table 6: ECAT Span of Service

Rte. #	Description	Type	Escambia County Area Transit Route Service					
			Monday - Friday		Saturday		Sunday	
			Service Span	Headway	Service Span	Service Span	Service Span	Service Span
1	ECAT/PINE FOREST/MOBILE HWY	Local	5:30 AM - 6:25 PM	60 min	7:30 AM - 6:25 PM	120 min	N/A	N/A
2	ECAT/CERVANTES/MYRTLE GROVE	Local	5:00 AM - 7:25 PM	60 min	6:00 AM - 7:25 PM	120 min	N/A	N/A
31	CORDOVA MALL / 12TH AVENUE	Local	6:00 AM - 5:55 PM	60 min	7:00 AM - 5:55 PM	120 min	N/A	N/A
32	9TH AVENUE / DOWNTOWN	Local	6:00 AM - 6:55 PM	60 min	7:00 AM - 5:55 PM	120-240 min	N/A	N/A
41	12TH AVENUE	Local	6:00 AM - 9:55 AM / 2:30 PM - 6:25 PM	40 min	N/A	N/A	N/A	N/A
43	UWF/SCENIC HEIGHTS/PIC	Local	5:30 AM - 6:55 PM	60 min	5:30 AM - 6:55 PM	120 min	N/A	N/A
44	T STREET	Local	5:00 AM - 6:55 PM	60 min	7:00 AM - 5:55 PM	120 min	N/A	N/A
45	MILK/DAVIS HWY	Local	5:30 AM - 7:25 PM	30 min (peak)/60 min (off peak)	6:25 AM - 7:20 PM	60 min	N/A	N/A
47	MONTCLAIR/OAKW. TR	Local	5:30 AM - 6:55 PM	60 min	6:00 AM - 6:55 PM	120 min	N/A	N/A
48	BAPTIST HOSPITAL/DOWNTOWN	Local	5:30 AM - 7:25 PM	60 min	6:30 AM - 5:25 PM	120 min	N/A	N/A
50	HIGHWAY 29	Local	5:00 AM - 7:55 PM	60 min	6:00 AM - 7:55 PM	120 min	N/A	N/A
51	OLD PALAFOX	Local	5:30 AM - 6:25 PM	60 min	7:30 AM - 6:25 PM	120 min	N/A	N/A
52	CORDOVA MALL / PENSACOLA ST. COLLEGE	Local	6:00 AM - 7:25 PM	30 min (peak)/60 min (off peak)	6:00 AM - 6:55 PM	120 min	N/A	N/A
55	BARRANCAS/BEACH HAVEN/NAVY POINT	Local	6:00 AM - 6:55 PM	60 min	6:00 AM - 6:55 PM	120 min	N/A	N/A
57	NATTC/CORRY/DOWNTOWN	Local	6:00 AM - 6:55 PM	60 min	6:00 AM - 6:55 PM	120 min	N/A	N/A
58	DOWNTOWN/VA/NAVY HOS./TARGET	Local	5:30 AM - 7:25 PM	120 min	7:30 AM - 7:25 PM	120 min	N/A	N/A
59X	NAS EXPRESS	Commuter	1:55 PM - 10:00 PM	30-100 min	10:35 AM - 1:15 AM	30-100 min	10:35 AM - 10:00 PM	40-100 min
60	ECAT/CENTURY COURTHOUSE* (Rural)	Commuter	5:20 AM - 7:55 PM	370-390 min	N/A	N/A	N/A	N/A
61	PENSACOLA BEACH*	Commuter	8:00 AM - 5:00 PM	210-300 min	8:30 AM - 6:00 PM	210-300 min	N/A	N/A
63	CROSSTOWN/MICHIGAN/AIRPORT	Local	6:00 AM - 6:20 PM	60 min	8:00 AM - 5:20 PM	120 min	N/A	N/A
64	BEACH JUMPER	Commuter	2:50 PM - 9:30 PM (FRI ONLY)	100 min	10:40 AM - 9:05 PM	100 min	10:40 AM - 9:05 PM	100 min
UWF	UWF TROLLEY	Trolley	6:55 AM - 8:45 PM	10-15 min	11:10 AM - 5:40 PM	60 min	N/A	N/A
Jury	JURY TROLLEY	Trolley	7:00 AM - 5:00 PM	N/A	N/A	N/A	N/A	N/A
SRIA	SRIA SEASONAL BEACH TROLLEY	Trolley	4:00 PM - 12:00 AM	15-20 min	4:00 PM - 12:00 AM	15-20 min	4:00 PM - 12:00 AM	15-20 min

*Note- limited 3 trips per day of morning, mid-day, and evening



Headways and frequency of service are general indications of the level of service provided along a route. Routes with the most frequent service generally have the highest levels of service in terms of the number of vehicles assigned and the total number of daily revenue hours. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

ECAT has more frequent headways (i.e., 30-minute service) on the most productive routes in the system during peak hours. Of 17 regular local fixed routes, Routes 45 and 52 have 30-minute weekday headways during peak hours. The remaining fixed routes operate on average of 60 minutes headways during peak and off-peak weekday hours, with the exception of Route 58 due to the extensive distance of the route.

Although the maximum weekday headway for ECAT local fixed routes is 120 minutes, more than 95% of the routes fall below this maximum threshold. The average weekday headway for ECAT local fixed routes is 60 minutes. For ECAT rural and commuter routes, vehicle headways are longer because the service availability is applied based on a number of daily trips rather than frequency.

Local bus service should be scheduled with headways of not more than 60-minutes during peak periods and 90-minutes during off-peak periods. The current ECAT average vehicle headways are shown in Table 7.

Table 7 –Average Vehicle Headways

Average ECAT Vehicle Headways			
Type	Weekday	Saturday	Sunday
Local	60 minutes	120 minutes	N/A
Commuter	198 minutes	167 minutes	100 minutes
Trolley	15 minutes	40 minutes	20 minutes

3. On-Time Performance

ECAT defines on-time performance as arrivals no earlier than the scheduled time and no more than five minutes past the scheduled time. To ensure that transit riders have confidence that the service will perform reliably in accordance with the public timetables prepared and distributed by ECAT, on-time fixed route performance standards have been established.

- A vehicle is considered "on-time" when its departure is from zero to five (5) minutes after the scheduled departure time.
- A vehicle is considered "late" when it departs more than five (5) minutes after the scheduled departure time.
- A vehicle which departs more than one (1) minute before its scheduled departure time is considered to be "early".

Table 8 provides the quantitative fixed route and paratransit on-time performance standards.

Table 8: ECAT and ECCT On-Time Performance Standards

Fixed Route and Paratransit On-Time Performance Standards		
Mode	On-Time Performance Measure (%)	On-Time Performance Measure (Time)
Fixed-route	90%	Arrive no earlier than scheduled time, no more than 5 mins past scheduled time.
Paratransit -ADA	90%	Dropped off no earlier than 30 mins before scheduled appointment time.
Paratransit -TD		Dropped off no earlier than 60 mins before scheduled appointment time.

The goal for ECAT is to achieve 90 percent on-time performance for all fixed-route service; routes performing with an on-time performance lower than 90 percent that is not the direct impact of weather, traffic incidents, detours, and/or events over a consistent period monthly are reviewed to determine if schedule modifications are necessary to meet the on-time performance standard.

The standard for ECAT schedule adherence for all fixed routes is established at ninety percent (90%) being on-time. The paratransit on-time performance goal is ninety percent (90%). Paratransit customers should be delivered no earlier than 30 minutes for ADA Transportation and 60 minutes for Transportation Disadvantaged before their scheduled appointment time.

Escambia County Area Transit continuously monitors on-time performance and system results are provided as part of the reports submitted to the Mass Transit Advisory Committee. ECCT (Paratransit) on-time performance and system results are provided as part of the reports submitted to the Escambia County Local Coordinating Board (LCB) for Transportation Disadvantaged.

4. Service Availability

The Title VI Circular states the following regarding service availability standards:

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

The basis of providing public transportation is to ensure access to those who need the service and to attract choice riders. To reach the maximum number of users within the available resources, ECAT provides fixed-route service from approximately 5:00 AM to 8:00 PM Monday through Friday and 6:00 AM to 8:00 PM on Saturdays. ECAT's Span of Service for each route is listed in Table 6.

Local paratransit service for Americans with Disabilities Act (ADA) customers is consistent with ADA requirements. Service is provided to origins and destinations within 3/4 of a mile on each side of each fixed route. All other transportation disadvantaged citizens outside fixed-route service area may access door-to-door TD paratransit service within Escambia County, contingent upon funding requirements and availability. Map 2 shows the current ECAT System Map, which displays all ECAT fixed routes and commuter routes.

The bus stop spacing along bus routes is a major influence on the proximity of transit service. The proper spacing and placement of bus stops is critical to the safety of passengers and motorists, and for effective transit operations. Bus stops should be spaced close enough together so that people can reach them easily, but far enough apart so that the bus is not continually stopping and starting, making the trip excessively slow. However, general guidelines for stop spacing and placement are as follows.

Table 9: ECAT Bus Stop Spacing

Bus Stop Spacing Guidelines	
Service Areas	Stop Spacing
Downtown	4 to 7 stops per mile
Urban Areas (outside of downtown)	3 to 6 stops per mile
Commuter /Express Routes	2 to 3 stops per mile
Rural Areas	At appropriate locations

Generally, bus stops should be spaced every 1/4-mile (0.25 mile). However, in dense areas, closer spacing may be necessitated than the recommended guidelines to meet operational needs. The recommended bus stop spacing should serve as a guide. The addition or subtraction of bus stop locations need to take into consideration the existing transit network, trip generators, land uses, and pedestrian infrastructure. Because of the number of factors involved, each new or relocated stop must be examined on a case-by-case basis utilizing the "ECAT Checklist for Potential New Transit Stops"¹ from the Florida-Alabama TPO Study.

¹ FL-AL TPO Transit Facilities Standards, West Florida Regional Planning Council June 16, 2015

Service Policies

The FTA requires fixed-route transit providers to develop qualitative policies that were developed for two indicators: distribution of transit amenities and vehicle assignments. These policies are described in more detail below.

1. Transit Amenities Distribution

Transit amenities refer to items of comfort and convenience available to the general riding public. Fixed route transit providers must set policy to ensure equitable distribution of transit amenities across the system. Transit amenities may include seating (benches, seat at stops/stations), bus shelters; printed information (signs, systems maps, schedules); waste receptacles including trash and recycling. ECAT currently has 1195 bus stops throughout their service area. Bus shelters are installed at 85 ECAT bus stops and free-standing benches are installed at 260 ECAT bus stops. Litter receptacles are another passenger amenity included within the ECAT service area. Placement of transit amenities are currently dictated by:

Paratransit service does not provide shelter and stop amenities since it is a door-to-door reservation-based service and stops may be made throughout the ADA and Transportation Disadvantages (TD) paratransit service area.

Shelter and bench placement are largely based on funding available, accessible land, and passenger boardings and alighting. ECAT provides new amenity installation related to service along each route based on guidance in the *FL-AL TPO Transit Facilities Standards Study* , which includes the following:

Bus Shelters

Bus shelters will be installed where daily passenger boardings exceed forty (40) passengers(as calculated through manual checks, farebox, or automated passenger count data) or at stops that serve concentrations of elderly residents or persons with disabilities, if there is sufficient right-of-way available to install the shelter, shelter access and appropriate amenities. A higher priority will be given to bus stops that receive less frequent service (with higher headways).

Bus Benches

Benches will be installed at bus stops where daily boarding's exceed twenty (20) passengers, (as calculated through manual checks, farebox, or automated passenger count data), provided that there is sufficient right-of-way available.

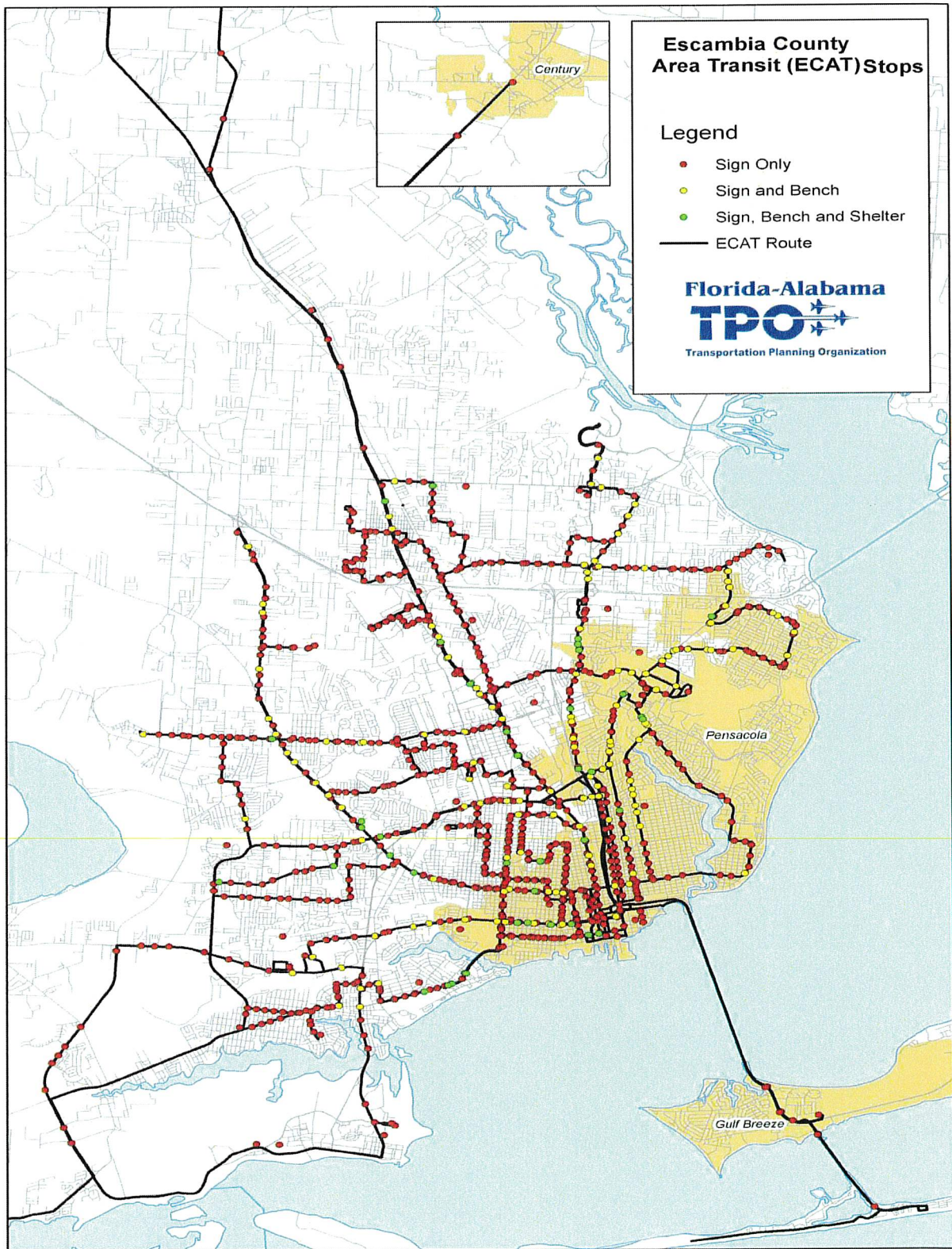
Shelters should ideally be placed in locations where they will be most heavily utilized by waiting passengers. These are generally in areas with the highest passenger boardings, but special considerations should also be made for transfer points between routes or locations where ridership is steady, but buses run infrequently, and average wait time is

greater. Emphasis is placed on transfer points and is still data-driven (by number of boardings).

Benches should be placed at all bus stops with greater than 20 boardings per day that do not have a shelter where possible. Benches may also be placed at other existing stops with lower ridership levels for advertising purposes. ECAT benches may not be placed at locations that have not been approved as ECAT bus stops.

Map #1 identifies the current ECAT routes and bus stops, including benches and shelter locations.

Map 1: ECAT Bus Stops



2. Vehicle Assignment

Escambia County Area Transit shall assign fixed route transit vehicles to individual routes based on vehicle mileage and with higher ridership and/or during peak periods. Escambia County Area Transit will ensure that the average age of fixed route transit vehicles assigned to revenue service will remain consistent with all service provided. Known fixed route block(s) operating with heavy ridership shall have vehicles assigned with the highest number of seating capacity. Express and limited stop commuter service shall operate with vehicles specifically designed for that type of service, upon equipment availability.

Conclusion

This ECAT Title VI Program Update was prepared pursuant to Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, "Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients (October 1, 2012)." The objectives of this Title VI program include ensuring that the level and quality of public transportation service are provided in a nondiscriminatory manner; promoting full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensuring meaningful access to transit-related programs and activities by persons with limited English proficiency. According to the criteria described in this document, ECAT is in compliance with Title VI requirements.

Appendices

Appendix A: FTA Circular 4702.1B Reporting Requirements for Transit Providers

Appendix B: Current System Description

Appendix C: TITLE VI Plan Adoption Meeting Minutes and FDOT Concurrence Letter

Appendix D: TITLE VI Sample Notice to the Public

Appendix E: TITLE VI Complaint Form

Appendix F: Public Participation Plan

Appendix G: Language Assistance Plan

Appendix H: ECAT Service Area Language Data

Appendix I: Demographic Maps

Appendix J: Major Service and Fare Change Policy

Appendix K: FL-AL TPO ECAT Transit Amenities Checklist

Appendix L: Escambia County Title VI Nondiscrimination Program Policy and Plan

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

- *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 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*

Appendix B: Current System Description

Current System Description

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

The Escambia County Area Transit (ECAT) provides transit service in the Pensacola, Florida urbanized area including the City of Pensacola and portions of Escambia County.

ECAT Vision

"Escambia County Area Transit will be the preferred transportation resource for citizens and visitors in Escambia and surrounding counties. The system will provide a cost-effective and exceptional transit choice that enhances mobility, provides community accessibility, encourages economic expansion, and embraces environmental sensitivity." (Escambia County 2022 TDP)

ECAT Mission Statement

"Escambia County shall operate a safe, reliable public transportation system that effectively and efficiently accommodates existing / future mobility needs, stimulates economic development and strengthens communities as identified through on-going outreach to Escambia County's residents, visitors and businesses." (Escambia County 2022 TDP)

Escambia County Area Transit'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.

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

Escambia County has established the Mass Transit Department, to manage the ECAT system. Our organization is made up of 125 full-time employees, and 26 part-time employees. The Director of Mass Transit is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Transportation services are provided in accordance with the BCC's approved Comprehensive Plan, Escambia County Transit Development Plan (2022), Escambia County Transportation Disadvantaged Service Plan (TDSP), ECAT Operations Manual/System Safety/Security Programs and other federal and state requirements. Our agency staffing plan is outlined in our 2022 Escambia County Transit Development Plan (page 201) and 2012 ECAT Operations Handbook (page 34).

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

Escambia County operates as a government authority. ECAT is a department governed under the Escambia County Board of County Commissioners. The Escambia County Board of Commissioners is the designated recipient and serves as the policy board of ECAT, which is a department of the County and is called the Mass Transit Department. Escambia County has a signed agreement with the FL-AL Transportation Planning Organization (TPO), in accordance with Federal Transit and Florida DOT requirements. Escambia County also operates as the Community Transportation Coordinator (CTC) and they have an executed CTC agreement with the state of Florida dated February 25, 2014.

Who is responsible for insurance, training and management, and administration of the agency's transportation programs?

Escambia County is responsible for management, insurance, and administration of the transportation program. ECAT's Safety and Security manager is responsible for training. All safety sensitive employees are required to complete 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 drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheelchair lifts and securement devices. The Safety and Security Manager and the Finance Manager are responsible for annual renewal of all liability insurance for FDOT, FTA and agency owned vehicles, as well as vehicle registration renewal. It is the Mass Transit Directors responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.

Who provides vehicle maintenance and record keeping?

Maintenance on all agency vehicles is provided by the Maintenance staff of the Mass Transit Department. The maintenance facility is Blue Seal Certified, and our technicians are ASE certified technicians with experience in 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 and driver files are kept on-site at our operations base located at 1515 W Fairfield Drive, Pensacola FL, 32501 and vehicle files are maintained by the Maintenance Supervisors, and all driver files are maintained by the Safety and Security Manager; and retained for a minimum of four (4) years.

Number of current transportation related employees

ECAT has a total of 125 employees that include: 70 full-time drivers, 24 part-time drivers, 3 administrators and 28 support staff.

Who will drive the vehicle, number of drivers, CDL certifications, etc.?

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. All our bus operators and technicians are required to carry a Commercial Driver's License. This allows coverage

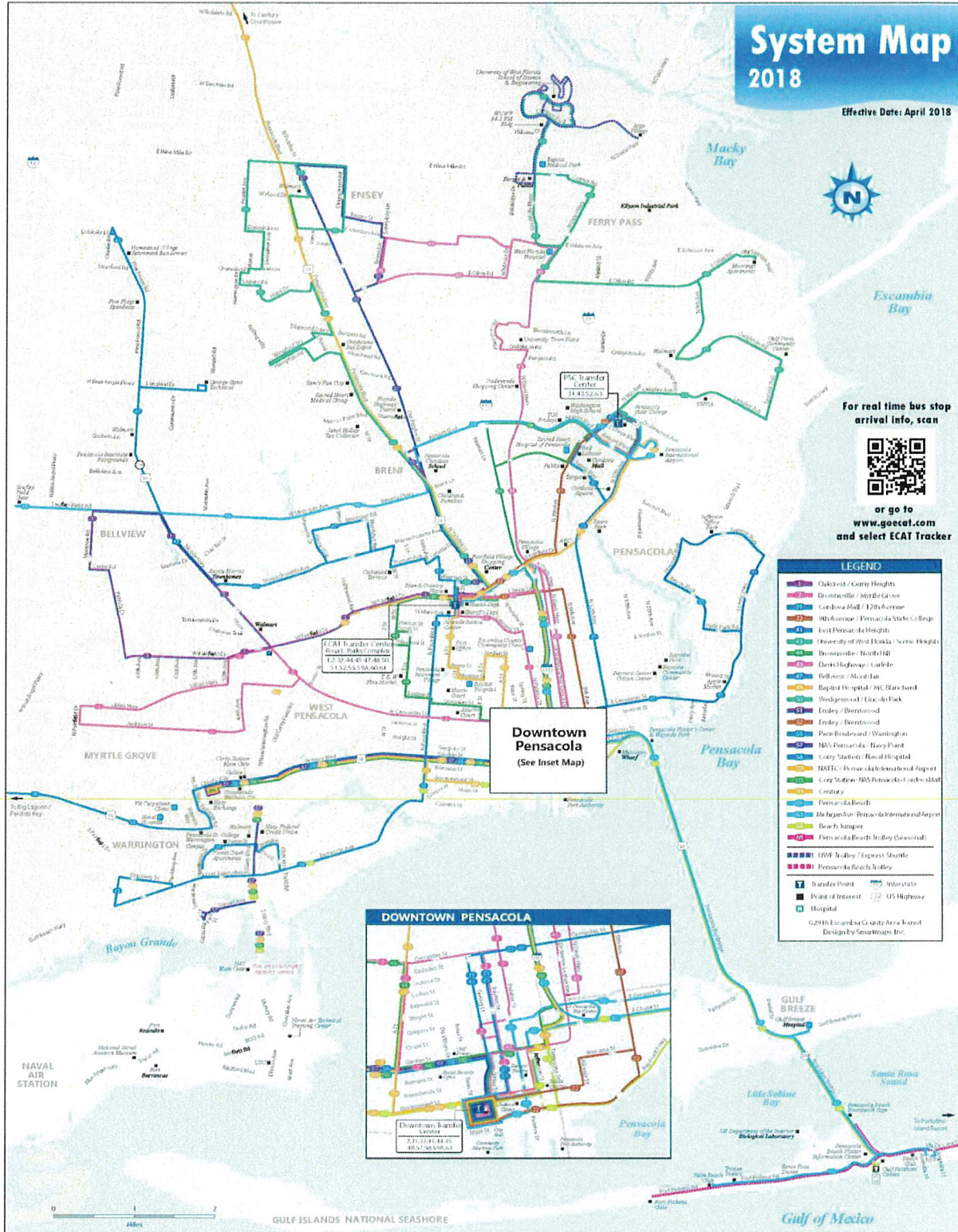
of all of the larger vehicles and for the opportunity for the other drivers to fill in on service routes with the larger vehicles.

A detailed description of service routes and ridership numbers

Fixed route transportation services provided through our program are available to all members of the public. Our service incorporates regular routes and commuter routes. All of our fixed route vehicles are equipped for wheelchair service. We provide an average of 4,000 passenger trips per day and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Map 2: ECAT System Map

ESCAMBIA COUNTY AREA TRANSIT



For route or schedule information, contact ECAT Customer Service at 850-595-3228 or go to www.goecat.com

**Appendix C: Title VI Program Adoption Meeting
Minutes and FDOT Concurrence Letter**

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**Appendix D: Title VI Notice to the Public
(Sample)**

Notifying the Public of Rights Under Title VI

Escambia County Area Transit (ECAT) operates its programs and services without regard to race, color, and national origin in accordance with the 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 the ECAT.

For more information on ECAT's civil rights program and the procedures to file a complaint, call 850-595-3228; find us online at goECAT.com; or visit our administrative office at 1515 West Fairfield Drive.

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 850 595-3228
Si necesita informacion en otro idioma, llame al 850 595-3228

Notificación al público de los derechos en virtud del título VI

El Área de Tránsito del Condado de Escambia (ECAT) opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que él o ella ha sido agravada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante el ECAT.

Para obtener más información sobre el programa de derechos civiles de ECAT y los procedimientos para presentar una queja, llame al 850-595-3228; Encuéntrenos en línea en www.goECAT.com; o visite nuestra oficina administrativa en 1515 West Fairfield Drive, Pensacola, Florida.

Un reclamante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja en la oficina de Derechos Civiles, Atención: Coordinador del Programa del Título VI, Edificio Este, 5to Piso-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact 850 595-3228.
Si necesita informacion en otro idioma, llame al 850 595-3228.



For more information on Escambia County's civil rights program, and the procedures to file a complaint, contact 850-595-3228; email ecat@myescambia.com or visit our administrative office at 1515 W Fairfield Drive, Pensacola FL 32501. For more information, visit www.goecat.com.

Appendix E: Title VI Complaint Form



ESCAMBIA COUNTY AREA TRANSIT TITLE VI COMPLAINT FORM

ECAT is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

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

Section I:					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Electronic Mail Address:					
Accessible Requirements?	Format	Large Print		Audio Tape	
		TDD		Other	
Section II:					
Are you filing this complaint on your own behalf?			Yes*	No	
*If you answered "yes" to this question, go to Section III.					
If not, please supply the name and relationship of the person for whom you are complaining:					
Please explain why you have filed for a third party: _____					
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No	
Section III:					
I believe the discrimination I experienced was based on (check all that apply):					
<input type="checkbox"/> Race		<input type="checkbox"/> Color		<input type="checkbox"/> National Origin	
<input type="checkbox"/> Disability		<input type="checkbox"/> Family or Religious Status		<input type="checkbox"/> Age	
<input type="checkbox"/> Other (explain) _____					
Date of Alleged Discrimination (Month, Day, Year): _____					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					



ESCAMBIA COUNTY AREA TRANSIT TÍTULO VI QUEJA Forma

Ecat se compromete a garantizar que ninguna persona queda excluida de la participación o denegación de los beneficios de sus servicios sobre la base de raza, color u origen nacional, según lo dispuesto por el título VI de la ley de derechos civiles de 1964, en su versión modificada. Las quejas del título VI deben presentarse dentro de los 180 días a partir de la fecha de la presunta discriminación.

El componente de justicia ambiental del título VI garantiza un trato justo para todas las personas y prevé la ECAT, para identificar la dirección, según proceda, los efectos desproporcionadamente elevados y adversos de sus programas, políticas y actividades en materia de minorías y de bajos ingresos poblaciones, como la realización de medidas razonables para garantizar que las personas con dominio del inglés limitado (LEP) tengan un acceso significativo a los programas, servicios e información que proporciona ECAT.

Sección I:				
Nombre:				
Dirección:				
Teléfono (casa):			Teléfono (trabajo):	
Dirección de correo electrónico:				
¿Requisitos de formato accesible?	Impresión grande		Cinta de audio	
	Tdd		Otro	
Sección II:				
¿Está presentando esta queja en su propio nombre?			Sí	No
* Si respondió "sí" a esta pregunta, vaya a la sección III.				
Si no es así, proporcione el nombre y la relación de la persona para la que se queja:				
Por favor explique por qué ha solicitado un tercero: _____				
Por favor confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de un tercero.			Sí	No
Sección III:				
Creo que la discriminación que experimenté se basó en (Marqué todas las que apliquen):				
<input type="checkbox"/> Carrera <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> edad				
<input type="checkbox"/> Discapacidad <input type="checkbox"/> Estado familiar o religioso <input type="checkbox"/> Otro (explique) _____				
Fecha de presunta discriminación (mes, día, año): _____				
Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas involucradas. Incluya el nombre y la información de contacto de la persona (s) que discriminó en su contra (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor utilice la parte posterior de este formulario.				

Appendix F: Public Participation Plan (PPP)



ESCAMBIA COUNTY AREA TRANSIT

PUBLIC PARTICIPATION PLAN (PPP)

JANUARY 2023

Introduction

The Public Participation Plan (PPP) for Escambia County Area Transit was developed to ensure that all members of the public, including minorities, disabled citizens, and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Escambia County Area Transit. 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 Escambia County Area Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Escambia County Area Transit also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, and community-based organizations, major employers, passengers and the public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals and Guiding Principles

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, disabled, minority, and LEP groups; to comment, about Escambia County Area Transit and its operations. The goals for this PPP include:

- ***Inclusion and Diversity:*** *Escambia County Area Transit will proactively reach out and engage low- income, minority, and LEP populations for the Escambia County Area Transit service area so these groups will have an opportunity to participate.*
- ***Accessibility:*** *All legal requirements for Americans with Disabilities Act (ADA) 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:*** *Escambia County Area Transit 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.*

Relevant Regulations and Policies

Escambia County Area Transit's public outreach functions under a wide variety of federal, state, and local requirements.

Public Participation Approach

Transportation decision making, and project development processes are regulated and follow set procedures, including the need to give the public opportunities to participate. This Public Participation Plan describes participation opportunities generally and includes specific protocols and resources that are designed to facilitate diverse and inclusive public outreach and involvement. The plan is a flexible and evolving document. As necessary, Escambia County Area Transit will revise the PPP based on recurring assessments, or successes and/or challenges associated with outreach, as well as suggestions made and the results of public engagement processes.

Public Participation Techniques

Escambia County Area Transit takes pride in its work to maintain a collaborative relationship with the community and its stakeholders. ECAT's public outreach efforts rest on utilizing multiple communication channels to distribute information to, and solicit input from, affected constituencies. ECAT typically communicates with the public and its customers through one or more of the following methods:

ECAT Website:

ECAT's website, www.goecat.com, is a comprehensive resource for people wanting information about ECAT services, programs, projects, and activities. The website offers trip planning which enables a full itinerary for bus routes and schedules in the area. Informing community members of what is available on the website is an important element of public outreach. Also, public notices of all ECAT's public meetings, public hearings, and public comment periods are posted on this site. Some programs and projects have dedicated web pages on the website that include information about upcoming meetings, fact sheets, and projects and plans. The website also includes access to ECAT's bus tracking application that allows passengers to see where their bus is in real time.

Customer Comments:

Individuals are encouraged to provide verbal or written comments about any subject to us. Comment Cards are supplied at the Customer Service Center in the ECAT Rosa Parks Terminal. Information on how to leave comments and feedback is also supplied at each event that ECAT attends. The ECAT website also has multiple mechanisms to receive comments including a variety of comment forms to fill out electronically and the Customer Service phone number where staff will take comments over the phone. That same phone number and/or email address is printed on ECAT printed materials, bus stop signs, and the passenger terminal.

Press Releases and Media Relations:

ECAT distributes press releases as appropriate on events and other important information to news and other media, in coordination with the Escambia County Community and Media Relations Department (CMR). All press releases are posted on www.myescambia.com or www.goecat.com. In addition, County CMR or ECAT's Senior Management are available to speak with reporters regarding various topics.

Printed Materials:

ECAT produces publications as needed, such as the Ride Guide route, maps, brochures, rack cards, promotional materials, detour notices, and posters, available to the general public. These publications include technical and policy information and often use visualization techniques to enhance understanding of transit planning. Materials notifying the public about routes, fare increases, route changes, or other significant information will be available or translated into other languages, as needed. All printed materials are offered free of charge.

Surveys:

ECAT may conduct surveys in print, by telephone, and online to collect public opinion on specific topics or issues. Depending on the data being collected, ECAT considers the methodologies that provide statistically valid data when possible. ECAT will also notify the public that surveys are available in Spanish and other accessible formats, to increase the response rate from low income, disabled, minority, and LEP populations.

Telephone Information Line:

ECAT's phone system offers pre-recorded information about changes in bus routes or scheduling due to holidays, inclement weather, construction, etc., as well as customer service and administration office hours.

On-Board Announcements:

On fixed route buses, ECAT broadcasts audio announcements as needed. Topics include items such as upcoming stops, detours, route and schedule changes, and public meeting notices.

Mailings and Email Lists:

ECAT periodically provides information about its services through mass mailings (electronically and printed) to targeted households near its routes.

Social Media:

ECAT utilizes Facebook, Twitter, and LinkedIn to distribute information and interact with a wider audience. ECAT may use other social media outlets as the technology changes.

Paid Advertisements:

To promote its services or collect public comments, ECAT may place paid advertisements in local printed or online publications, on the radio, television, or other websites.

Focus Groups:

At times, the complexity of a project, controversial issues, or the reality of having multiple large Title VI groups to address may require engaging targeted audiences of stakeholders. ECAT has conducted focus groups in the past to specific projects, such as route changes, to increase stakeholder participation and feedback.

Mass Transit Advisory Committee:

The purpose of the Mass Transit Advisory Committee (MTAC) is to bring together several local citizens with a vested interest in the success of ECAT projects. Escambia County Mass Transit Advisory Committee is to advise the Board of County Commissioners on mass transit issues in Escambia County, to help facilitate a community vision for mass transit in Escambia County and to assist the Board in developing and maintaining effective and efficient mass transit systems in Escambia County. The committee shall consist of fourteen (14) members, with two members appointed by each Commissioner, one member appointed by the County Administrator, one member appointed by the Mayor of the City of Pensacola, one member appointed by the Pensacola City Council, and one member appointed by the Mayor of the Town of Century. Committee members' terms shall run concurrently with the term of the County Commissioner or the Mayor who appointed them. The Committee member appointed by the County Administrator shall serve a term of four years.

Community Outreach Booths:

ECAT provides information about the bus system at community events and public gathering spaces to raise awareness of our services and/or promote ridership. Many of these events include community groups supporting veterans, minorities, homeless population, as well as individuals with physical and mental disabilities.

Travel Training and Classroom on Wheels:

ECAT offers free training to individuals and groups on how to use and access ECAT services. ECAT staff travel to different events to provide presentation in a class training format to community groups or individuals to teach them about how to understand routes, fares, safety and introduce patrons to the ECAT bus services.

Open Houses:

Open houses are informal settings where public can obtain information about a plan, program, or project. At ECAT open houses, people receive information informally from exhibits and staff, and they are encouraged to give opinions, make comments, and state preferences to staff, orally or in writing. Presentations, slide shows, and one-on-one discussions with staff are done continuously throughout open houses. Since there is no fixed agenda, open houses are usually scheduled for specified allotted hours in the day or evening, so that people can drop in, at their convenience, and fully participate. The number of locations for open houses depends on the project and audience. Staff makes every effort to be as inclusive as possible and to schedule open houses at convenient locations along bus routes.

Board Meetings:

The Board of Escambia County Commissioners generally meets to review the agenda at 9 a.m. and then in regular session to vote on agenda items beginning at 5:30 PM on the first and third Thursday of each month. A public forum is held prior to these meetings at 4:30 PM, where the public is invited to attend and speak on the topic of their choice for three minutes. Discussions take place during the Committee of the Whole meetings at 9:00 AM on the second Thursday of each month. These meetings are open to the public and include an opportunity for the public to comment on any item relating to transit. The Board of Escambia County Commissioners meets at 221 S Palafox St # 400, Pensacola, FL 32502.

Public Meetings and Workshops:

All ECAT public meetings, including committee meetings and other events, are conducted in facilities that are accessible to persons with disabilities and to people who rely on public transit. Public meetings, such as open houses, community outreach events, or hearings may be held at various times and locations throughout the county to allow people with traditional and non-traditional schedules to attend.

[Evaluation and Update of the Public Participation Plan](#)

Escambia County Area Transit's Public Participation Plan is intended to be a living document that will be informed by current and future practices, successes, and lessons learned. ECAT will continue to adapt and modify its public participation practices over time, as needed.

[Examples of Public Involvement and Outreach](#)

Early outreach efforts were implemented for the Transit Development Plan. An introductory presentation was made to the Escambia County and Santa Rosa County Local Coordinating Boards (LCB). Other outreach efforts used during this planning process are as follows:

Agency Group Meetings: During the second phase of public involvement activities, an Agency Discussion Group meeting was held. Representatives from agencies included Pathways for Change, UWF Center on Aging, Independence for the Blind, Lakeview Center, and the United Way of Escambia County which attended the meeting. In addition, a

meeting of the Escambia County Mass Transit Advisory Committee (MTAC) is the oversight group for community input into the transit system. Compiled data, completed tasks, and proposed transit service alternatives are presented to the participants, followed by a discussion on the proposed transit service.

Discussion Groups: A discussion group workshop was held with six long-term users of the ECAT system with participants identified and recruited by the TDP Technical Review Team. After introductions of attendees, a discussion guide was used to obtain input from the participants that included both riders and nonriders. Attendees from the Escambia County MTAC were invited to participate in the discussion. After introductions of attendees, a guide was used to facilitate a discussion on existing and future transit service in Escambia County.

Grassroots Efforts: Project Team members attended "grassroots" community events to reach out and gather input from both riders and non-riders. The following community events were attended by the Project team:

Surveys: A survey aimed at the general public, including persons who currently do not use the ECAT system, was administered via the project website and at public workshops. The survey, administered in both English and Spanish, resulted in 203 surveys completed. An onboard survey was conducted. The method used for surveying bus riders was distribution of a self-administered, 15 question survey instruments to all passengers aboard ECAT bus routes. The surveys were distributed on approximately 40% of ECAT bus runs for both weekdays and Saturdays and distributed over four full weekdays (Tuesday through Friday) and Saturday. Riders on all ECAT routes received identical surveys. The standard survey instrument was translated into Spanish.

Although the example provided demonstrates many of the public outreach efforts that ECAT implements, it is not all inclusive, nor does it encompass every aspect of ECAT public outreach.

Appendix G: Language Assistance Plan (LAP)



ESCAMBIA COUNTY AREA TRANSIT

LANGUAGE ASSISTANCE PLAN (LAP)

JANUARY 2023

Introduction

On August 11, 2000, President William J. Clinton signed an executive order, *Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency*,¹ to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

This Executive order stated that individuals who have a limited ability to read, write, and speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, "LEP", or Limited English Proficient. The Executive Order states that:

"Each Federal Agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities."

Not only do all Federal agencies have to develop LEP plans, recipients receiving Federal financial assistance have to comply with Title VI and LEP guidelines of the Federal agency from which funds are provided as well. Simply put, any organization that receives Federal financial assistance is required to follow this Executive Order. Escambia County receives funds from the Federal Transit Administration (FTA) as a direct recipient, and through the Florida Department of Transportation (FDOT) as a sub-recipient.

Elements of an Effective LEP Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

- *Identifying LEP persons who need language assistance*
- *Identifying ways in which language assistance will be provided*
- *Training Staff*
- *Providing notice to LEP persons*

The recommended method of evaluating accessibility to available transportation services is the Four-Factor Analysis identified by the USDOT. These recommended plan elements have been incorporated into this plan.

Methodology for Assessing Needs for Reasonable Steps for an Effective LEP Policy

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to access language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.*
- 2. The frequency with which LEP individuals encounter the program.*
- 3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.*
- 4. The resources available to Escambia County Area Transit, and the Overall cost.*

The greater the number or proportion of eligible LEP persons; the greater the frequency with which that have contact with a program, activity, or service and the great the importance of that program, activity, or service, the more likely enhance language services will be needed. The intent of DOT's guidance is to suggest a balance ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. More information for recipients and sub-recipients can be found at <http://www.lep.gov>.

Element 1 - Identifying LEP persons who need language assistance

The Four-Factor Analysis

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to Escambia County Transit services and activities that may affect their quality of life. Recommendations are then based on the results of this analysis.

Factor 1 – Number or proportion of LEP persons eligible to be served or likely to be encountered by program or recipient.

The number and proportion of LEP persons within the ECAT service area was assessed using the 2016–2020 American Community Survey (ACS) Five-Year

Estimates to determine the number of people who speak English less than "very well" for Escambia County and for each Census block group within the ECAT service area.

According to the 2015 ACS, ECAT Service Area's population for ages 5 and over is 287,654, as shown in LAP Table 1. Approximately 3.1 percent of the total population speak English less than "very well," with approximately 50 percent of the LEP population are identified as Asian/Pacific Islander. The second most common language among LEP persons is Spanish at 38 percent.

Percent. Since Spanish and Asian/Pacific Islander LEP language groups constitute at least 1,000 persons, ECAT is obligated to provide some written translations of vital documents under the Safe Harbor Stipulation. Asian and Pacific Island languages include Chinese, Japanese, Thai, Vietnamese, and languages spoken by indigenous people of Australia along with other Pacific cultures.

Once the percentages of each the individual languages within the Asian and Pacific Island categories, only Vietnamese has a more than 1,000 individuals. Obligations under the Safe Harbor Stipulation are further discussed in this Language Assistance Plan.

Of the 287,654 residents in the Escambia County Area Transit service area 7,374 residents describe themselves as speaking English less than "very well". People of Spanish descent are the primary LEP persons likely to utilize Escambia County Area Transit services. For the Escambia County Area Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area's population 92% speak English "very well". For groups who speak English "less than very well", 36% speak Spanish and 33% speak Asian and Pacific Island Languages, 31% speak other languages. (Table 1)

(Refer to Appendix A for a complete table listing all the languages spoken at home by the ability to speak English for the population within the Escambia County Area Transit service area).

Table #1

ECAT Service Area Language Demographic Information		
Language Spoken at Home	# of Individuals	Percentage
Population 5 years and over	287,654	100%
English Only	266,098	93%
Language other than English	21,556	7%
Speak English less than 'very well'	7,374	2.6%
Spanish	9,157	31.8%

Asian and Pacific Island*	6,574	30.4%
Other Languages	707	3.2%
Other Euro Languages	5,118	23.8%

Factor 2 – Frequency with which LEP persons encounter programs, activities, and services.

Escambia County Area Transit has assessed the frequency with which LEP individuals encounter the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. Community outreach and the ECAT and County website are the main sources of potential contact between the ECAT and LEP persons. As a result, the frequency of contact is difficult to anticipate. Current contact with LEP individuals is relatively infrequent, such as phone inquiries and informal staff survey feedback of ECAT dispatchers and driver’s interaction with LEP persons. Most of these interactions have occurred with LEP persons who mainly spoke Spanish.

Factor 3 – Nature and importance of program, activity, or service provided by program to people’s lives.

ECAT realizes that public transportation services can be very important to LEP individuals who may need these critical services to travel to jobs, go shopping for basic items such as food and clothing, or for getting to medical appointments. To assist LEP persons in accessing public transportation services, ECAT provides route information and schedules for the Spanish-speaking and Asian/Pacific Islander-speaking populations of Escambia County, which are available upon request throughout the entire county. Flyers announcing workshop, route or schedule changes, closings, and other significant events are also provided in Spanish. These are posted on buses for the most widespread notice to riders. Additionally, when a transportation planning activity calls for an on-board survey, it is distributed in English and Spanish. The Title VI Policy Statement, Title VI Complaint Procedures, and the Title VI Complaint Form are also provided in Spanish and are available on the ECAT website. These documents also can be provided in other accessible formats, if needed.

ECAT ensures that all segments of the population, including LEP persons, have been or have had the opportunity to be involved in the public transportation planning process. The impact of proposed transportation investments on underserved and under-represented population groups is part of the evaluation process for use of Federal funds in several major areas:

1. *Transit Development Plan (TDP)*
2. *Transportation Improvement Program (TIP)*
3. *Comprehensive Operational Analysis (COA)*
4. *Long Range Transportation Plan (LRTP)*

5. *Transportation Disadvantaged Service Plan (TDSP)*

Inclusive public participation is a priority in these plans, studies, and programs as well as the impacts of public transportation enhancements resulting from these planning activities impact all residents. Understanding and involvement are encouraged throughout the process, and every effort is made to make the planning process as inclusive as possible.

Factor 4 – Resources available to recipient for LEP outreach and costs associated with outreach.

Given the significant size of the LEP population in Escambia County as well as financial constraints, full translation of all transportation documents is not reasonable at this time. However, bus schedules, information brochures, and flyers announcing public involvement activities, route or schedule changes, closings, and other significant events as well as Title VI information are provided in Spanish. Items are printed in-house or by external print agencies.

Continued growth of Escambia County and its Spanish and Asian/Pacific Islander populations make offering Spanish and Asian/Pacific Islander translations in many areas a good community investment; therefore, the County continues to make efforts to partner with State and local agencies to provide language translation and interpretation services when practical within the scope of funding available. ECAT suggests that the public make requests seven business days in advance of public meetings to accommodate LEP assistance.

ECAT continues to monitor the need for additional language assistance, including the need for greater dissemination of information in the current languages provided and/or translation to new languages. If additional services are needed, ECAT will determine which additional language assistance measures are cost-effective and feasible for implementation based on the current and projected financial resources.

Safe Harbor Stipulation

Federal law provides a "safe harbor" stipulation so recipients of Federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A "safe harbor" means that as long as a recipient has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under these circumstances does not mean non-compliance, but rather provides recipients with a guide

for greater certainty of compliance in accordance with the Four-Factor Analysis. Evidence of compliance with the recipient's written

translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5 percent of the population or 1,000 persons, whichever is less, of eligible persons served or likely to be affected. Translations also can be provided orally. Under this law, ECAT provides translations of vital documents in Spanish as needed.

The "safe harbor" provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

Element 2 - Describe how recipient provides language assistance services by language.

As noted in the Four-Factor Analysis, approximately 3 percent of Escambia County's population speak English less than "very well." ECAT currently undertakes the following to ensure that LEP persons have access to important information prepared by the transit agency:

- *Document translations – ECAT provides the Title VI Notice to the Public, Title VI Complaint Procedure, and Title VI complaint form in Spanish and Asian/Pacific Islander.*
- *Translation of informational items – ECAT offers Spanish and Asian/Pacific Islander versions of bus schedules, information brochures, flyers announcing workshops, route or schedule changes, closings, and other significant events.*
- *Website translation feature – ECAT's website includes a Google Translate feature that allows text to be translated into Spanish, and many other languages.*
- *Interpreter requests for public events – Interpreter services are available free of charge upon request at least seven business days prior to public meetings or workshops.*

Element 3 – Describe how recipient trains employees to provide timely and reasonable language assistance to LEP populations.

All ECAT staff are provided with the LEP Plan and educated on the procedures and services available through training. This training discusses the following topics:

1. *Information on the ECAT Title VI Procedures and LEP responsibilities (ongoing).*
2. *Description of language assistance services offered to the public (ongoing)*

3. *Documentation of language assistance requests (drivers note requests to dispatch)*
4. *How to handle a potential Title VI / LEP complaint (ongoing)*

This information is also part of the ECAT staff orientation process for new hires. Such training ensures that staff are fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals.

Element 4 – Describe how recipient provides notice to LEP persons about availability of language assistance.

USDOT LEP guidance indicates that once an agency has decided to provide language services, it is important that the recipient notify LEP persons of services available free of charge in languages LEP persons would understand. Examples of methods for notification include:

- *Stating in outreach documents that language services are available.*
- *Signage when free language assistance is available with advance notice.*
- *Working with community-based organizations and other stakeholders to inform LEP individuals of the public transportation services and the availability of language assistance.*
- *Providing information as to the availability of translation services (free of charge) when advertising for public hearings or public transportation-related workshops.*

ECAT takes reasonable steps to make available interpreter services, free of charge, and to include, at the minimum, Spanish and Asian/Pacific Islander translators upon request at least seven business days prior to transportation disadvantaged meetings, workshops, public hearings, or events. ECAT defines an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and transfers the meaning of written text from one language into another.

Component 5 – Describe how recipient monitors, evaluates, and updates language assistance plan.

ECAT provides an ongoing needs assessment to determine how best to continue reaching LEP persons in Escambia County and improving ongoing efforts. To ensure that the intent of the LEP plan remains current, ECAT staff continues to monitor and update the plan and report progress every three years as part of the Title VI Program update; monitor interactions with LEP persons annually through review of on-line, written, or in-person requests for language translation; and review external agency LEP information, such as FTA, FDOT, and the Florida-Alabama TPO, for assistance in developing internal LEP training and processes.

Angela Walden, Transit Information Specialist/ Title VI Coordinator, 1515 W Fairfield Drive, [Pensacola FL, 32501](https://www.pensacolafl.gov/), alwalden@myescambia.com or Ph 850-595-3228, or fax 850-595-3222.

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- i. The executive Order verbatim can be found online at <https://www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20938.pdf>
 - ii. Policy Guidance Concerning Recipient Responsibilities to Limited English Proficient (LEP) Persons. Federal Register: December 14, 2005 (Volume 70, Number 239)
 - iii. Department of Justice Final LEP Guidelines, Federal Register June 18, 2002 (Volume 67, Number 117)
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Appendix H: Language Data: ECAT Service Area

Operating Area Language Data Table

Escambia County, Florida						
Subject	Total	Percent	Percent of specified language speakers			
			Speak English only or English "very well"	Percent speak English only or English "very well"	Speak English less than "very well"	Percent speak English less than "very well"
			Estimate	Estimate	Estimate	Estimate
Population 5 years and over	287,654	(X)	284,196	97.6%	7,374	2.6%
Speak only English	266,098	93.0%	(X)	(X)	(X)	(X)
Speak a language other than English	21,556	7.0%	14,182	65.8%	7,374	34.2%
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	9,157	2.8%	5,964	72.2%	2,638	31.8%
5 to 17 years old	1,337	0.5%	1,231	92.1%	106	7.9%
18 to 64 years old	6,324	2.2%	4,262	67.4%	2,062	32.6%
65 years old and over	595	0.2%	471	79.2%	124	20.8%
Other Indo-European languages	5,118	1.5%	3,429	76.2%	1,073	23.8%
5 to 17 years old	725	0.2%	630	86.9%	95	13.1%
18 to 64 years old	2,999	1.0%	2,287	76.3%	712	23.7%
65 years old and over	778	0.3%	512	65.8%	266	34.2%
Asian and Pacific Island languages	6,574	2.4%	3,466	50.5%	3,399	30.4%
5 to 17 years old	500	0.2%	290	58.0%	210	42.0%
18 to 64 years old	5,150	1.8%	2,468	47.9%	2,682	52.1%
65 years old and over	1,215	0.4%	708	58.3%	507	41.7%
Other languages	707	0.2%	463	70.2%	197	29.8%
5 to 17 years old	106	0.0%	86	81.1%	20	18.9%
18 to 64 years old	445	0.2%	292	65.6%	153	34.4%
65 years old and over	109	0.0%	85	78.0%	24	22.0%
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	238,553	(X)	235,317	98.6%	3,236	1.4%
Speak only English	225,877	94.7%	(X)	(X)	(X)	(X)
Speak a language other than English	12,676	5.3%	9,440	74.5%	3,236	25.5%
Spanish	5,241	2.2%	4,336	82.7%	905	17.3%
Other languages	7,435	3.1%	5,104	68.6%	2,331	31.4%

American Community Survey 2013-2017 5 Year Estimates, B16001

Percentages of Escambia County Demographics by Census Tract/Block Group

Census Tract/ Block Group	Total Population	Percent of Minority Population	Total: Households	Households with income below poverty level in the past 12 months	Limited English speaking households: Spanish	Limited English speaking households: Asian & Pacific Island

120330001001	958	39.67	456	9.65	0.00	0.00
120330010014	1173	8.44	442	2.26	0.00	0.00
120330010015	559	12.70	201	16.92	0.00	0.00
120330010021	1300	21.08	618	15.86	0.00	0.00
120330010022	462	13.42	259	6.18	0.00	0.00
120330010023	1452	32.92	657	3.04	0.00	0.00
120330011011	2038	24.98	829	6.03	1.21	2.17
120330011012	1312	30.11	479	9.19	0.00	0.00
120330011013	983	6.82	429	0.00	0.00	0.00
120330011014	1091	27.04	345	5.22	0.00	0.00
120330011031	893	10.97	375	11.20	0.00	0.00
120330011032	1692	16.19	697	6.60	0.00	0.00
120330011041	2080	31.30	723	14.11	0.00	0.00
120330011042	1924	50.21	683	2.05	0.00	2.20
120330011043	1058	23.06	504	7.54	0.00	0.00
120330011044	1727	28.08	667	12.74	0.00	0.00
120330012012	416	45.67	213	0.00	0.00	0.00
120330012013	896	1S.SI	544	10.11	0.00	0.00
120330012014	346	37.28	194	23.20	0.00	0.00
120330012015	2091	57.10	1004	36.55	0.00	6.57
120330012021	956	11.72	548	15.69	0.00	0.00
120330012022	3869	43.14	1322	14.67	0.00	0.00
120330013001	1027	49.56	482	20.75	0.00	0.00
120330013002	2743	91.32	803	39.10	0.00	0.00

120330013003	1221	60.69	369	17.62	0.00	0.00
120330014011	1129	19.04	289	10.03	0.00	0.00
120330014012	143	48.95	56	30.36	0.00	0.00
120330014013	4305	24.53	194	3.09	0.00	0.00
120330014021	1761	39.24	817	29.62	0.00	0.00
120330014022	2588	51.55	808	23.14	0.00	0.00
120330014023	1045	42.87	407	28.01	0.00	0.00
120330014024	2198	69.11	745	9.53	0.00	0.00
120330015001	951	98.32	317	28.71	0.00	0.00
120330015002	468	100.00	195	28.72	0.00	0.00
120330016001	3175	80.09	553	38.16	0.00	0.00
120330017001	1563	87.46	703	21.34	0.00	0.00
120330017002	794	18.51	338	17.75	0.00	0.00
120330018001	2399	70.74	877	26.11	0.00	0.00
120330019001	2003	60.76	767	21.51	0.00	1.17
120330026011	3251	29.16	1130	4.87	0.00	0.00
120330026021	759	3.95	399	4.26	0.00	0.00
120330026022	676	2.96	284	6.69	0.00	0.00
120330026031	1138	11.42	501	5.99	0.00	0.00
120330026032	1730	17.40	657	1.52	0.00	0.00
120330026033	4738	17.94	1676	3.64	0.00	0.00
120330026034	1135	25.20	519	3.08	0.00	0.00
120330026041	2431	34.51	882	7.03	0.00	0.00
120330026042	2024	10.13	829	10.37	0.97	0.00
120330026051	2712	36.17	875	12.57	0.00	3.54
120330026052	2967	31.14	1084	9.23	4.06	0.00

120330027011	3242	28.22	1120	13.13	0.00	1.43
120330027031	1726	59.04	754	13.66	0.00	1.46
120330027032	683	42.31	370	40.54	0.00	4.05
120330027041	2180	38.03	920	26.63	0.00	0.00
120330027042	3233	22.24	1469	9.67	0.61	0.00
120330028011	923	36.94	397	9.57	0.00	0.00
120330028012	2078	35.08	804	23.01	0.00	4.48
120330028021	1624	8.19	800	10.88	0.00	0.00
120330032031	1094	33.91	437	1.60	0.00	0.00
120330032032	2958	75.66	1167	10.71	0.00	0.00
120330032033	929	12.16	315	1.90	0.00	0.00
120330032041	1534	20.53	491	1.22	0.00	0.00

Percentages of Escambia County Demographics by Census Tract/Block Group

Census Tract/ Block Group	Total Population	Percent of Minority Population	Percent of Population 5+ Yrs - Speak English 'not well' or 'not at all'	Total: Households	Households with Income below poverty level in the past 12 months	Limited English speaking households: Spanish	Limited English speaking households: Asian & Pacific Island
120330032042	1589	34.99	0.19	621	7.41	0.00	0.00
120330033011	4290	22.96	1.46	1572	5.98	0.00	0.00
120330033051	2613	39.76	1.22	748	6.55	0.00	0.53
120330033061	1661	29.44	1.73	805	9.81	0.00	0.00
120330033062	2207	26.10	0.00	910	5.27	0.00	0.00
120330033063	361	6.37	0.00	192	0.00	0.00	0.00
120330033064	1603	42.11	2.97	584	5.99	0.00	1.88
120330033071	2462	38.95	0.00	831	12.76	0.00	0.96
120330033081	3911	23.55	0.79	1604	2.87	0.00	0.00
120330033091	1072	46.55	0.00	385	12.73	0.00	0.00
120330033092	1825	23.67	0.00	723	2.07	0.00	0.00
120330033093	2311	26.96	0.00	1112	6.21	2.07	0.00
120330033094	1298	21.65	1.75	645	4.19	2.95	0.00
120330034001	3169	20.48	0.00	1548	2.26	0.00	0.00
120330034002	1300	60.54	18.99	522	44.06	18.39	0.00
120330034003	689	50.51	0.00	347	19.60	0.00	0.00
120330035031	1328	28.92	0.00	447	5.37	0.00	0.00
120330035032	1409	22.78	0.00	499	0.00	0.00	0.00
120330035033	2946	36.90	0.00	1221	16.13	0.00	0.00
120330035034	1603	14.16	0.00	666	7.81	0.00	0.00
120330035051	1563	38.77	0.00	651	14.75	0.00	5.68
120330035052	3148	40.25	3.43	1318	17.53	5.92	0.00
120330035061	1528	30.17	2.29	632	12.03	0.00	3.01
120330035062	1162	36.92	3.72	512	16.41	3.91	0.00
120330035063	2539	58.25	5.04	905	22.87	0.00	4.75
120330035071	3400	28.91	0.00	1862	22.50	2.74	0.00
120330035072	846	44.21	0.00	344	0.00	0.00	0.00
120330035073	1459	59.77	18.85	567	14.11	0.00	23.63
120330035074	1496	34.89	2.39	580	13.79	0.00	0.00
120330035081	1644	53.35	8.72	620	4.35	0.00	0.00
120330035082	3059	51.16	0.00	1213	22.18	0.00	0.00
120330035083	2759	56.69	4.72	908	31.39	0.00	0.00
120330036031	4647	17.90	0.47	1627	6.88	0.00	0.00
120330036032	2086	18.07	0.00	809	4.94	0.00	0.00
120330028022	2162	40.66	0.00	790	4.05	0.00	0.00
120330028023	1072	30.22	0.00	402	18.16	0.00	0.00
120330028031	1016	41.54	0.00	413	23.24	0.00	0.00
120330028032	2170	41.75	0.00	847	10.27	0.00	0.00
120330028041	2444	50.20	0.72	280	2.14	0.00	1.79
120330028042	1320	54.39	0.34	567	11.64	0.00	0.00
120330029001	1271	41.78	0.00	539	13.54	0.00	0.00
120330029002	902	42.90	1.61	397	15.62	3.53	0.00
120330029003	1102	26.50	0.76	436	11.47	1.83	2.52
120330029004	1215	38.93	0.98	436	16.28	0.00	0.00
120330030001	1645	42.61	0.00	772	13.47	0.00	0.00
120330030002	1726	34.07	0.00	768	2.60	0.00	0.00
120330030003	1401	62.10	0.00	574	36.59	0.00	3.31
120330030004	1096	73.91	1.28	461	6.07	0.00	2.60
120330031001	2553	74.07	0.54	990	12.12	0.00	0.71
120330031002	1179	59.20	0.60	511	5.28	1.37	0.00
120330031003	959	77.89	0.00	423	7.33	0.00	0.00
120330032011	1554	41.25	2.78	601	15.31	0.00	0.00
120330032012	3176	46.22	1.63	1511	4.50	0.00	0.66
120330020001	708	64.41	0.45	321	16.51	0.00	0.00
120330020002	1236	51.13	0.34	476	18.07	0.00	0.00
120330021001	2283	55.72	0.00	955	5.24	0.00	0.00
120330021002	1426	37.80	0.00	802	7.23	0.00	2.74
120330021003	583	30.53	4.80	303	37.29	0.00	0.00
120330022001	887	31.45	0.00	358	17.60	0.00	3.07
120330022002	969	51.91	0.00	362	40.88	0.00	0.00
120330022003	599	11.02	0.00	320	13.44	0.00	0.00
120330022004	1113	36.03	1.50	477	9.85	0.00	0.00

Percentages of Escambia County Demographics by Census Tract/Block Group

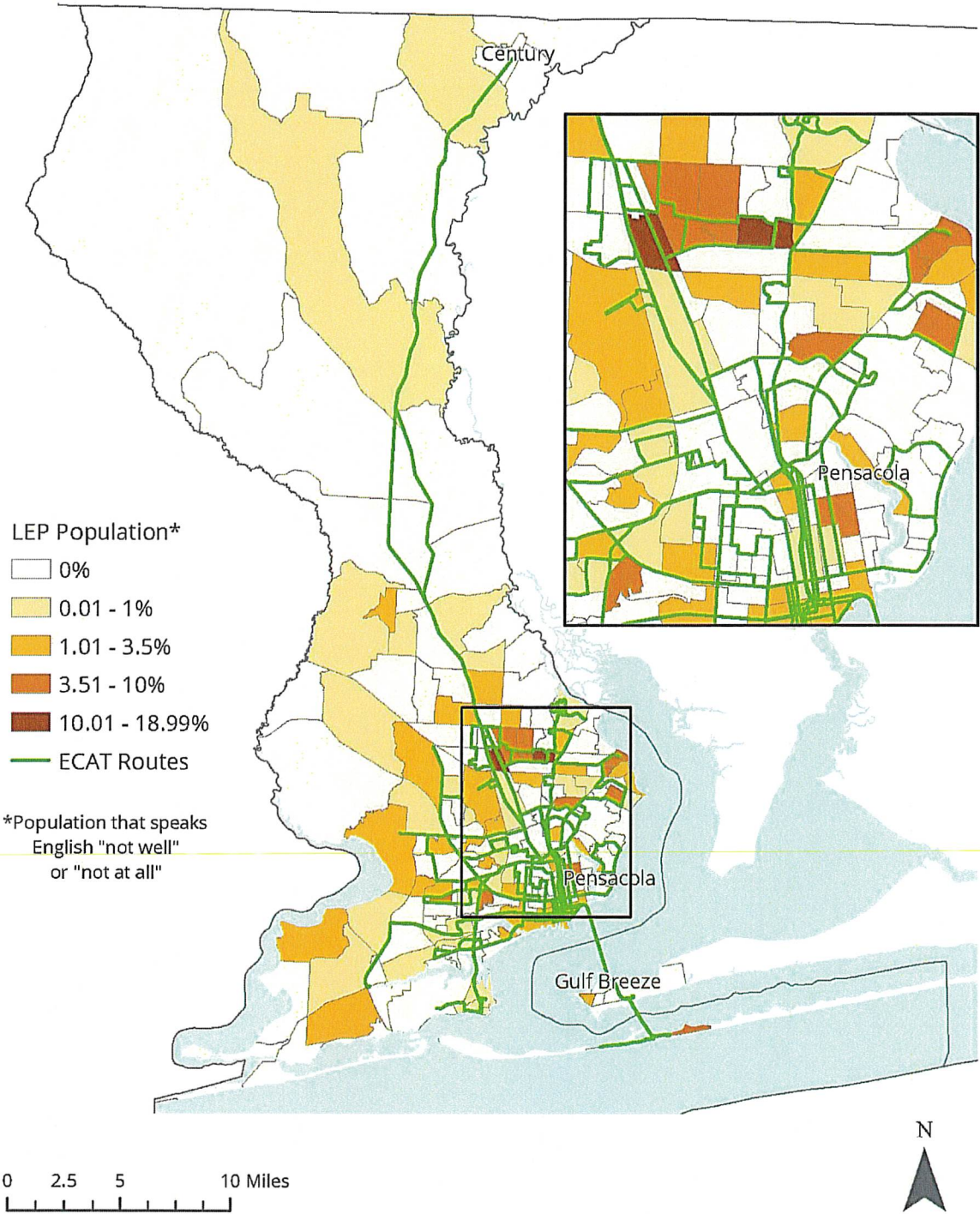
Census Tract/ Block Group	Total Population	Percent of Minority Population	Percent of Population 5+ Yrs - Speak English 'not well' or 'not at all'	Total: Households	Households with income below poverty level in the past 12 months	Limited English speaking households: Spanish	Limited English speaking households: Asian & Pacific Island
120330023001	898	21.60	0.00	475	2.53	0.00	0.00
120330023002	628	26.27	0.00	320	0.00	0.00	0.00
120330023003	447	18.57	0.00	245	6.53	6.12	0.00
120330023004	1387	8.58	0.00	715	17.34	0.00	0.00
120330023005	999	5.61	0.00	393	25.70	0.00	0.00
120330024001	277	39.35	0.00	211	12.80	0.00	0.00
120330024002	5136	47.06	0.79	248	4.44	0.00	0.00
120330024003	875	31.43	0.94	72	5.56	0.00	0.00
120330025003	867	35.99	4.69	319	25.71	0.00	0.00
120330001002	493	57.61	2.23	227	16.74	0.00	0.00
120330003001	1138	47.80	1.51	503	26.84	0.00	1.59
120330003002	1182	46.36	0.00	564	32.09	5.14	0.00
120330004001	1018	93.03	0.00	428	19.86	0.00	0.00
120330004002	800	92.88	0.00	282	45.04	0.00	0.00
120330004003	1488	80.38	0.00	833	36.73	0.00	0.00
120330005001	709	46.83	0.00	292	15.07	0.00	0.00
120330005002	572	29.72	0.00	251	11.16	0.00	0.00
120330006001	1633	80.10	0.13	538	25.09	0.00	0.00
120330008001	1189	9.59	2.71	601	22.63	0.00	2.16
120330008002	1822	63.50	5.09	676	22.63	6.51	0.00
120330008003	669	17.64	0.00	282	23.76	0.00	0.00
120330008004	473	24.10	0.21	351	4.27	0.00	0.00
120330008005	354	0.00	0.00	237	26.16	0.00	0.00
120330009001	618	3.56	0.00	294	0.00	0.00	0.00
120330009002	875	15.43	0.00	366	8.20	0.00	0.00
120330009003	1016	17.91	0.00	441	1.59	8.16	0.00
120330010011	1007	56.21	0.00	488	13.25	0.00	0.00
120330010012	713	14.59	2.24	294	0.00	0.00	5.44
120330010013	2286	20.47	0.00	670	4.63	0.00	0.00
120330036143	1027	3.12	0.00	441	6.12	0.00	0.00
120330036144	2406	67.58	0.00	680	24.85	0.00	0.00
120330037001	1839	23.71	0.00	570	2.63	0.00	0.00
120330037002	1361	35.71	0.71	518	5.21	0.00	0.00
120330037003	722	25.76	0.00	341	12.61	0.00	0.00
120330038001	1367	18.58	0.00	513	6.82	0.00	0.00
120330038002	2774	6.27	0.00	1082	9.24	0.00	0.00
120330039001	1519	11.45	0.78	567	8.99	0.00	2.29
120330039002	878	0.00	0.00	457	4.16	0.00	0.00
120330039003	460	1.52	0.00	213	26.29	0.00	0.00
120330039004	1151	33.01	0.00	438	4.79	0.00	0.00
120330040001	2690	41.15	0.34	454	4.41	0.00	0.00
120330040002	401	43.39	0.00	180	21.11	0.00	0.00
120330040003	638	35.42	0.00	332	11.75	0.00	0.00
120330040004	781	53.65	0.00	299	8.36	0.00	0.00
120339900000	0	0.00	0.00	0	0.00	0.00	0.00
120330036033	1432	21.09	0.00	529	2.84	0.00	0.00
120330036071	3272	27.38	1.01	725	24.69	0.00	1.10
120330036081	1105	32.58	0.00	403	21.09	0.00	0.00
120330036082	1797	11.74	0.00	713	21.74	0.00	0.00
120330036083	4075	14.50	0.00	1306	4.21	0.00	0.00
120330036084	1166	33.62	0.00	440	0.00	0.00	0.00
120330036091	2309	34.86	2.82	911	13.28	0.00	6.70
120330036092	1272	26.97	0.00	599	10.52	0.00	0.00
120330036101	2910	13.99	0.69	1130	5.40	0.00	1.50
120330036102	3835	16.25	1.39	1235	4.37	0.00	1.05
120330036111	2554	18.25	1.93	1124	4.72	0.00	0.00
120330036112	2613	24.45	0.00	970	0.00	0.00	0.00
120330036121	2895	11.09	0.00	881	3.29	0.00	0.00
120330036122	1861	15.74	0.00	940	2.13	0.00	0.00
120330036131	1400	0.57	0.00	508	8.07	0.00	0.00
120330036132	1190	4.29	0.64	439	16.40	0.00	0.00
120330036133	1085	17.51	1.12	372	8.87	0.00	0.00

Percentages of Escambia County Demographics by Census Tract/Block Group

Census Tract/ Block Group	Total Population	Percent of Minority Population	Percent of Population 5+ Yrs - Speak English 'not well' or 'not at all'	Total: Households	Households with Income below poverty level in the past 12 months	Limited English speaking households: Spanish	Limited English speaking households: Asian & Pacific Island
120330036141	800	13.63	0.00	273	10.26	0.00	0.00
120330036142	2374	11.12	0.35	772	2.33	1.04	0.00
121130109001	995	3.52	0.00	428	0.00	0.00	0.00
121130109002	1302	2.92	0.00	487	5.54	0.00	0.00
121130109003	1343	0.00	0.00	549	8.56	2.73	0.00
121130109004	867	19.03	1.73	362	4.42	0.00	0.00
121130109006	866	0.00	0.00	429	17.48	0.00	0.00
120330012011	1056	37.03	0.00	503	37.57	0.00	0.00
120330025002	1121	7.14	0.00	541	4.99	0.00	0.00
121130109005	878	2.73	0.00	344	0.00	0.00	0.00

Appendix I: Demographic Maps

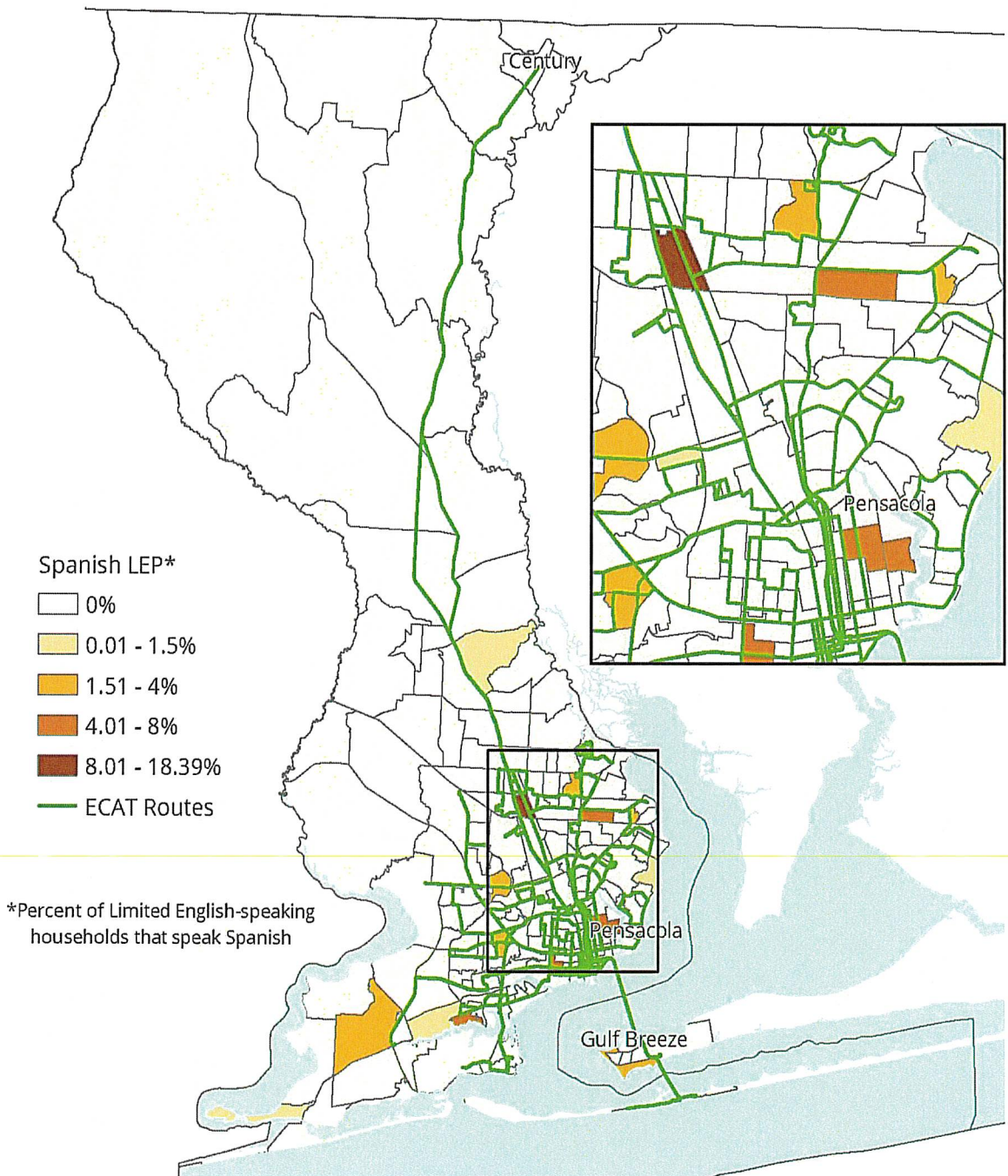
ECAT - Title VI - Limited English Proficiency by Census Block Group



Source: FGD/L/Census ACS 2013-2017 5-Year Estimates B16004
 S:\PROJECTS\TPO\PublicTransit\ECAT\TitleVI_LEP\TitleVI_LEP.aprx paulj

5/8/2019

ECAT - Title VI - Limited English Proficiency, Spanish-Speaking Households by Census Block Group



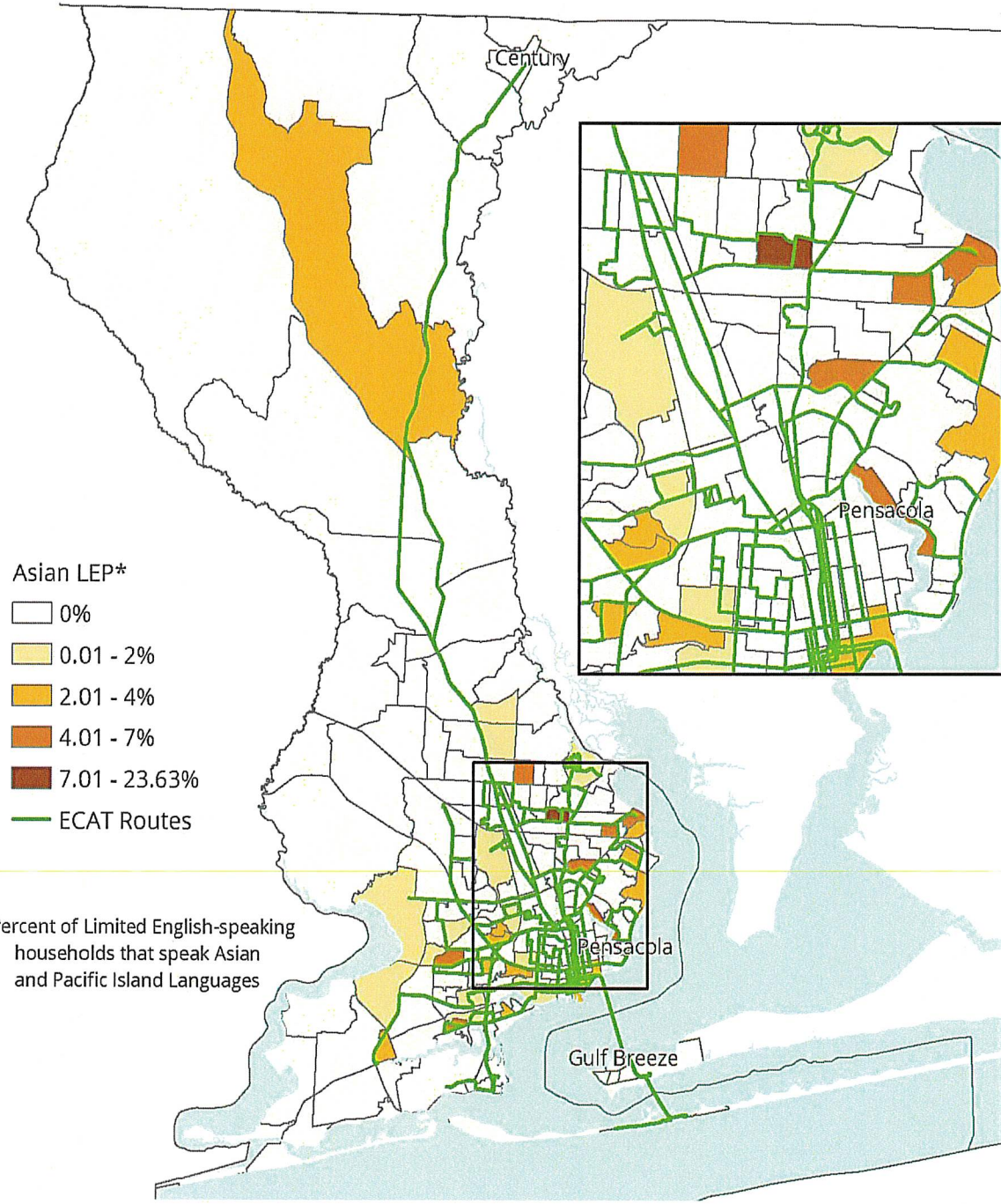
*Percent of Limited English-speaking households that speak Spanish

0 2.5 5 10 Miles



Source: FGDL/Census ACS 2013-2017 5-Year Estimates C16002

ECAT - Title VI - Limited English Proficiency, Asian and Pacific Island Language-Speaking Households by Census Block Group



- Asian LEP*
- 0%
 - 0.01 - 2%
 - 2.01 - 4%
 - 4.01 - 7%
 - 7.01 - 23.63%
 - ECAT Routes

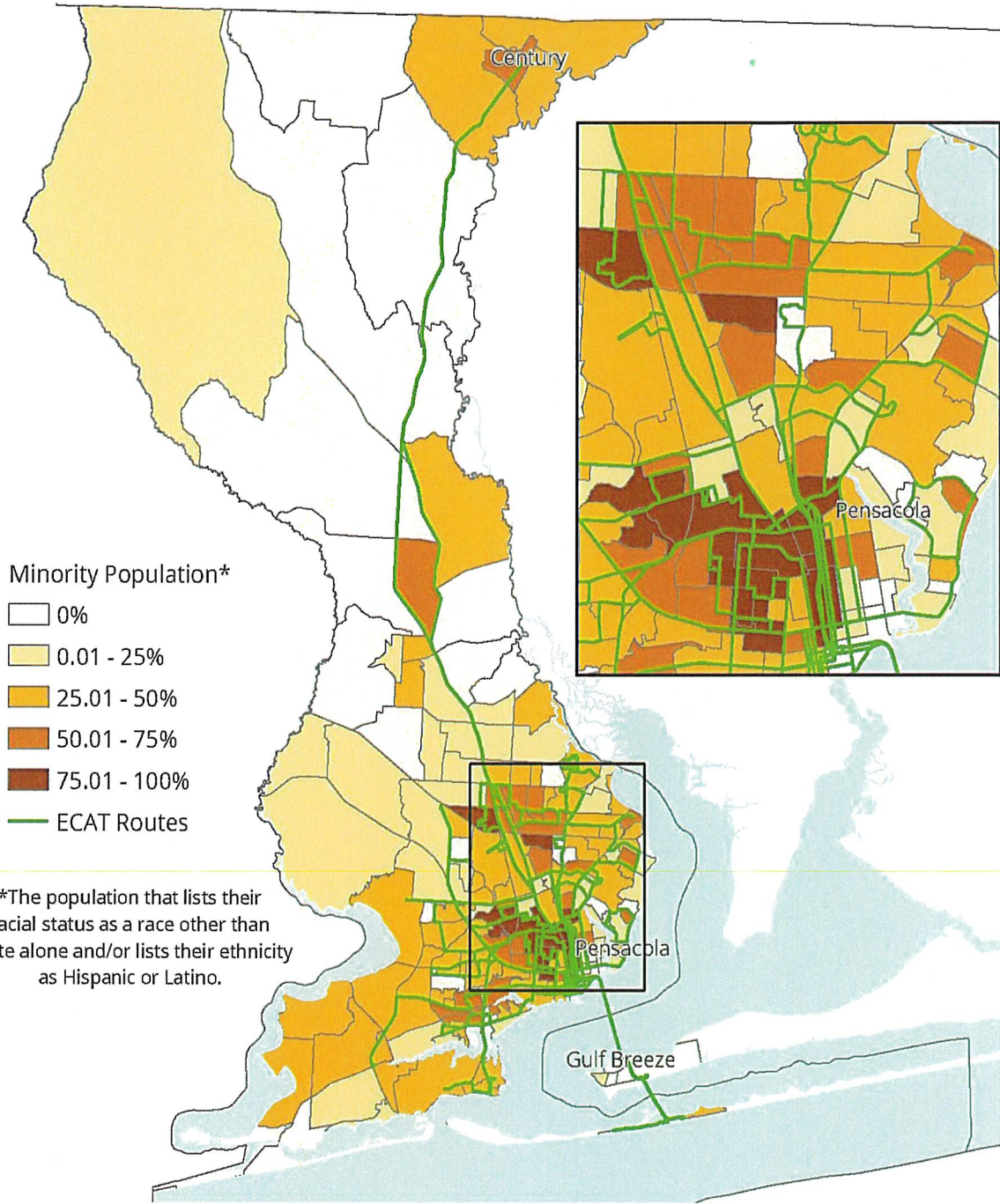
*Percent of Limited English-speaking households that speak Asian and Pacific Island Languages

0 2.5 5 10 Miles



Source: FGDL/Census ACS 2013-2017 5-Year Estimates C16002

ECAT - Title VI - Minority Population by Census Block Group



- Minority Population*
- 0%
 - 0.01 - 25%
 - 25.01 - 50%
 - 50.01 - 75%
 - 75.01 - 100%
 - ECAT Routes

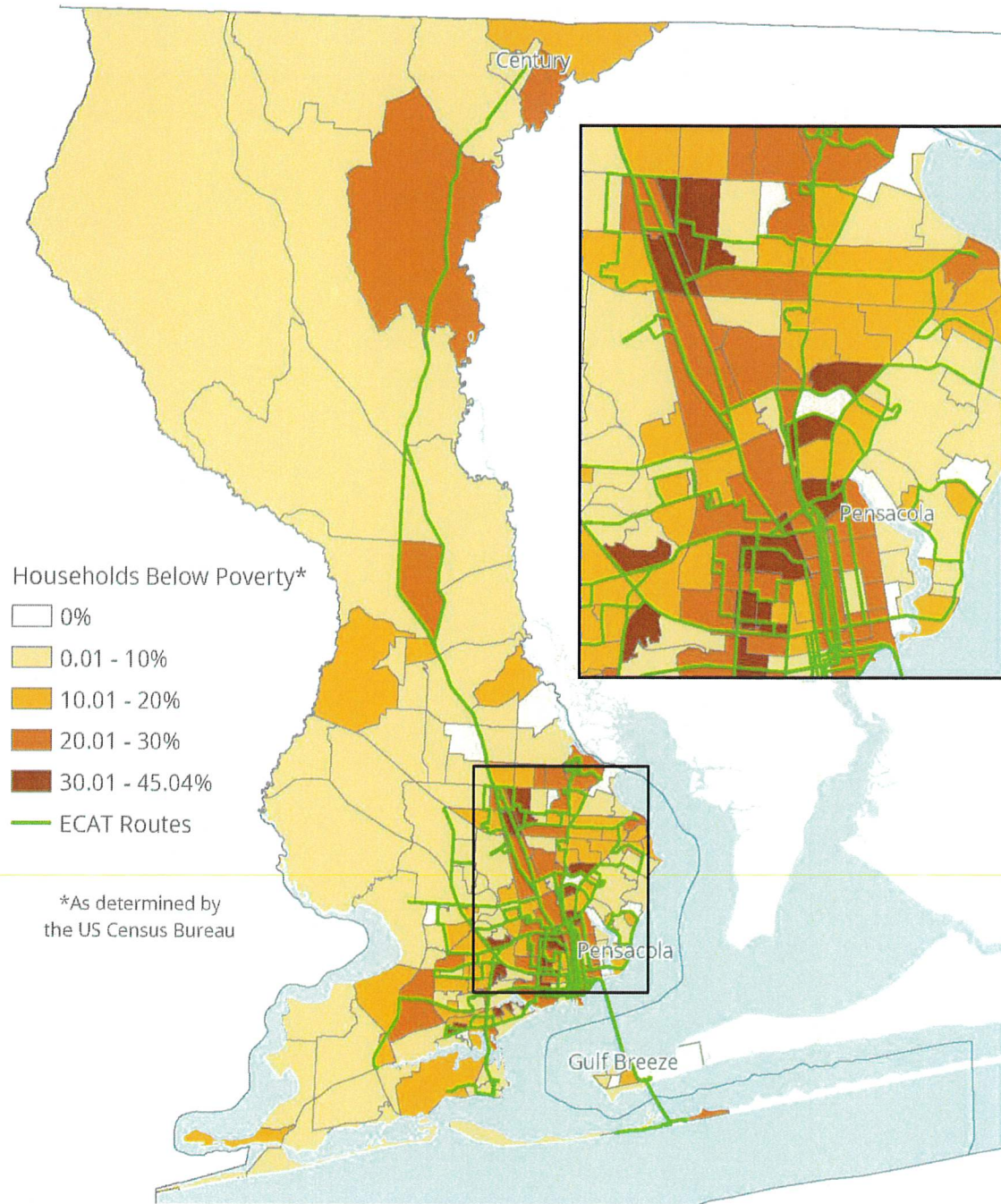
*The population that lists their racial status as a race other than white alone and/or lists their ethnicity as Hispanic or Latino.

0 2.5 5 10 Miles



Source: FGDL/Census ACS 2013-2017 5-Year Estimates

ECAT - Title VI - Household Poverty Status by Census Block Group



0 2.5 5 10 Miles



Source: FGDL/Census ACS 2013-2017 5-Year Estimates B17017

Appendix J: Major Service and Fare Change Policy



Escambia County Area Transit Soliciting Public Comment for Fare and Schedule Changes Policy

When Escambia County Area Transit (ECAT) proposes to change fares or make a major service reduction, it will adhere to the following guidelines for soliciting public comment. For these guidelines, a major service reduction will be defined as " a 25% reduction in hours and/ or vehicle miles."

Public comment will consist of the following:

- a. 30-day notice in a newspaper of public record for a public hearing(s) to solicit comment from riders and the general public and otherwise how the public may comment to the ECAT.
- b. 14 days in advance, notices posted on ECAT vehicles and on the ECAT website of intent to change fares or reduce service and where the public hearing will occur. The notice will also inform riders how their input may be made to ECAT.
- c. 14 days in advance, public hearing notices will be posted, including how riders' input may be made to ECAT, at the transfer center for buses or online.
- d. Notifications will be consistent with Title VI guidelines and available in English and Spanish and other accessible formats, as needed.

Review of Public Comment

The Mass Transit Director will summarize the input from the public hearing record and the input from riders on buses and other sources and provide it to the Escambia County Board of County Commissioners to consider in their deliberations to act on a fare change or service reduction.

A handwritten signature in black ink, appearing to read "RAK", is written over a horizontal line.

Rodriques A. Kimbrough
Mass Transit Director
Escambia County Board of County Commissioners

Date: 1/20/2023
(850) 595-3228

Appendix K: FL-AL TPO ECAT Transit Amenities Checklist

Checklist for Potential New Transit Stops

Analysis Element - Origin Metrics	Determination	Score	Weighting	Weighted Score	Notes	Other Information
Is the proposed stop on an existing route?	Yes	1	100%	1	Adding transit stops along existing routes can be accommodated more easily than creating new routes	
If the proposed stop is on an existing route, how many routes serve the potential stop?	3 or more Routes	3	100%	3		
Can a short route deviation accommodate a new market/ridership area?	No	0	100%	0	Sometimes a small deviation of a current route can be made to access new markets	
If the proposed stop is on an existing route, what is the average number of boarding and alightings at the two nearest existing stops?	>20 Daily Boardings/Alightings	1	100%	1	High numbers of boardings and alightings at adjacent stops could signify the need for an additional stop. The average number of daily boardings/alightings at each ECAT bus stop is 12.7	
What is the total population within 1/4 mile of the proposed stop?						
Population density range within 1/4 mile	Greater than 10 people per acre	2	100%	2	Escambia County has an average of 2.48 persons per household	US Census Bureau
Primary residential dwelling unit type at origin	Single family, large lots	0	100%	0	Neighborhoods with small lot single family homes and multi-family homes are more conducive to transit use	Accessing Transit Version II
Average household income within 1/4 mile	< \$20,000 per household	1	100%	1	Households that earn less than \$20,000 annually use transit 4 times as much as higher income groups	CHPC Building and Preserving Affordable Homes Near Transit
Zero vehicle households within 1/4 mile	> 30% households	3	100%	3	48.5% of transit riders do not own a car	CHPC Building and Preserving Affordable Homes Near Transit
People with disabilities with 1/4 mile	>20%	2	100%	2		
Percentage of older adults (65 years and older) within 1/4 mile	Less than 10%	0	100%	0	Over 20.2% of older adults do not drive compared to 6.9% of adults age 19-64.	Estimating the Impacts of the Aging Population on Transit Ridership NCHRP 20 65
Analysis Element - Destination Metrics	Determination	Score	Weighting	Weighted Score	Notes	Source
Employment density within 1/4 mile	2 or less employees per acre	0	100%	0		Accessing Transit Version II
Is a major employment center with greater than 50 employees within 1/4 mile	No	0	100%	0	Areas with 40-50+ employees per acres support transit service	
Is a special trip generator within 1/4 mile (i.e. Military base, College/University)	No	0	100%	0		
Is a major activity center located within 1/4 mile	Yes	1	100%	1	Activity centers typically include education facilities, hospitals/health services, government and social services, shopping centers, entertainment	
What is the type of street grid pattern in the surrounding area?	Traditional suburban grid	1	100%	1	Gridded street patterns allow for better access to transit stops	PACE Transit Supportive Guidelines
Analysis Element - Physical Site Characteristics	Determination	Score	Weighting	Weighted Score	Notes	
Is there a sidewalk adjacent or near the proposed stop?	Yes	1	100%	1		
If a sidewalk is present, is the sidewalk at least 5 ft. wide?	No	0	100%	0		
If a sidewalk there is a nearby or adjacent sidewalk, are curb cuts present?	No Sidewalk Present	0	100%	0		
Is there a pedestrian crossing (i.e. crosswalk) near the proposed stop?	No	0	100%	0		
Is there available ROW to install a 5'x8' loading pad at the proposed stop site?	No	0	100%	0		
Is there available ROW to connect loading pad to nearby sidewalk?	Yes	1	100%	1		

Click to add Weighted Score to Scoring Summary Sheet

Total Score:	17	Total Weighted Score:	17
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Is the potential new stop eligible for a shelter?	YES
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Appendix L: Escambia County Title VI Nondiscrimination Program Policy

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