



LAKE COUNTY
FLORIDA

Lake County Public Transportation Division Title VI Program

*Prepared by the Lake County Public Transportation Division, in cooperation
with the Lake~Sumter Metropolitan Planning Organization (MPO) and the
Florida Department of Transportation (FDOT)*

*315 W. Main Street
Post Office Box 7800
Tavares, FL 34748
(352) 742-6580 / (352) 742-6582 (fax)
www.Lakecountyfl.gov*

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Introduction

This program reflects Lake County Public Transportation Division commitment to ensuring that its services are fully accessible to all individuals without regard to race, color, national origin, age, gender or sexual orientation.

Policy Statement

A 1994 Presidential Executive Order directed every Federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on "minority populations and low-income populations." The DOT's environmental justice initiatives accomplish this goal by involving the potentially affected public in developing transportation projects that fit harmoniously within their communities without sacrificing safety or mobility.

The Lake County Board of County Commissioners assures that no person shall on the grounds of race, color, national origin, sex, age, disability or income status, gender or sexual orientation as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity. The County further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that the Board of County Commission distributes federal aid funds to another entity, the Board of County Commission will include Title VI language in all written agreements and will monitor for compliance.

The Public Transportation Director is responsible for initiating and monitoring Title VI activities, preparing required reports and other Board of County Commission responsibilities as required.

By: _____

Cindy Hall, County Manager

Date

Attest: _____

Date

Authorities

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. (please refer to 23 CFR 200.9 and 49 CFR 21). Title VI of the Civil Rights Act of 1964, 42 United States Code 2000d to 2000-4; 42 United States Code 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; 29 Code of Federal Regulations 50.3

Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, subrecipients, and consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [2.557] March 22, 1988. FTA Circular 4702.1A, dated May 13, 2007"Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients.

The National Environmental Policy Act of 1969 (NEPA) stressed the importance of providing for "all Americans safe, healthful, productive, and esthetically pleasing surroundings", and provided a requirement for taking a "systematic, interdisciplinary approach" to aid in considering environmental and community factors in decision making.

Delegation Chart and Coordination of Title VI Program/ Environmental Justice

Lake County Board of County Commission
Public Transportation Division
Kenneth Harley
Transportation Director
(352) 742-6580

The demographics of Lake County are as follows:

Race	Percent
White	83.2%
Black or African American	8.6%
American Indian and Alaska Native	0.8%
Asian	1.4%
Native Hawaiian and other Pacific Islander	0.1%
Some other Race	4.8%
Two or more races	1.5%
Hispanic or Latino	9.8%
Total	100%

FEDERAL TRANSIT ADMINISTRATION CIVIL RIGHTS ASSURANCE

Lake County Board of County Commissioners hereby certifies that as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

No person on the basis of race, color, national origin, age, gender or sexual orientation will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

Lake County Public Transportation Division will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.

Lake County Board of County Commission will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

Lake County Public Transportation is responsible for ensuring that all sub recipients of FTA funds comply with all applicable federal and state regulations and program requirements. Lake County Public Transportation has developed specific monitoring practices that provide for the comprehensive oversight of sub recipients and ensures compliance with all provisions relative to project administration, management and operations. Sub recipients certify through the execution of their agreement with the Board of County Commissioners that they will abide by all the federal and state assurances as a recipient of federal funds.

INTRODUCTION

Lake County Public Transportation began service to the citizens of Lake County on May 21, 2007. Lake County has prepared this Title VI report to the Federal Transit Administration, (FTA), providing for a program to ensure that transit services made

available is equitably distributed, and provides equal access and mobility to any person without regard to race, color, or national origin.

This report has been prepared pursuant to Title VI of the *Civil Rights Act of 1964*; FTA Circular 4702.1, "Title VI Program Guidelines for Federal Transit Administration Recipients," (26 May 1988); and FTA Circular 4702.1A, dated May 13, 2007"Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients, and a recent Memorandum from the FTA's Director of Civil Rights outlining Title VI Program Updates requirements and paperwork reduction. Also, this update summarizes the expansion of transit service that has occurred since the start of service by Lake County Public Transportation.

PUBLIC TRANSPORTATION SERVICE

Two routes have been established, offering service throughout Lake County urbanized area from the Villages to Eustis. All routes provide service on weekdays. There is no service offered on Saturdays, Sundays or on seven nationally recognized holidays (News Years Day, Martin Luther King Jr. birthday, July 4th, Labor Day, Memorial Day, Thanksgiving and Christmas). All routes operate between the hours of 6:00 a.m. and 7:45 p.m.

Lake County Public Transportation minority customers utilize the services on a daily basis. All Lake County Public Transportation services are available to all persons without regard to race, creed, color, religion, sex, age, or ethnic background.

GENERAL REPORTING REQUIREMENTS

Lake County has submitted its annual Title VI assurance as part of its annual Certification and Assurance submission to FTA.

RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS

Over the reporting period Lake County Public Transportation has not received any complaints or lawsuits alleging discrimination based on violation of the American with Disabilities Act of 1990 or Title VI related issues.

There are currently no lawsuits or complaints alleging that Lake County Public Transportation has discriminated against any one on the basis of race, color, national origin, age, gender, or sexual orientation with respect to service or other transit benefits.

Pending Applications for Financial Assistance provided by the Federal Transit Administration or Other Federal Agencies

Lake County Public Transportation currently has pending FY 06-07 applications for Section 5307 funds and pending applications with the Florida Department of Transportation for Section 5310 and Section 5311 Funds.

Lake County Community Services also has a Shelter Plus Care Grant Program which was awarded back in June 2007 that is still pending activation.

Civil Rights Compliance Review Activities

Lake County Public Transportation remains a relatively new system, consequently there have been no federal, state, or local reviews of civil rights compliance.

FTA Civil Rights Assurance/ DOT Title VI Assurance

All certifications and assurances for fiscal year 2007/08 were filed electronically with the FTA's online Grant Management Information System, including the FTA Civil Rights Assurance and the DOT Title VI Assurances.

Hard copies of the federal assurances are available in the files that were submitted with the Section 5310 and Section 5311 grant applications.

Disparity in Levels and Quality of Service

Chapter III §3a[2] of the Title VI Circular (FTA C 4702.1), entitled *Service Standards and Policies*, requires that transit systems establish transit service policies and standards for five transit service indicators: 1) Vehicle Load; 2) Vehicle Assignment; 3) Vehicle Headway; 4) Distribution of Transit Amenities; and 5) Transit Access.

There is always additional need for transit services; however, the service provided is based on the funding availability and greatest demand. Demand is determined by reviewing population, affordable housing, employment, automobile availability, and economic statistics prior to implementing service. Existing services are reviewed against these same categories in addition to those listed in the service standards noted above.

Vehicle Load:

Lake County Public Transportation is a new service and has not experienced any vehicle overloads. In the event we experience vehicle overloads they will be addressed by running backup vans on overloaded routes. Lake County Public Transportation has a service standard specifying load factors shall not exceed 120% of vehicle capacity in peak periods.

Vehicle Assignment:

Currently Lake County has five buses that operate along the fixed route and one spare. The buses are rotated through the system to ensure that the mileage is evenly distributed on each vehicle.

Transit Access:

Under the *Americans with Disabilities Act of 1990*, transit agencies are required to provide access to services via either accessible fixed route buses or complementary paratransit service. ATS is currently 100% compliant in the active fleet and provides

wheelchair lifts on all fixed routes. For disabled passengers unable to functionally access a fixed route stop, paratransit services are offered within the ¾ mile legal limit.

Service Headways:

There are two routes in the current system. Service begins at 6:00 a.m. and ends at 7:45 p.m. Each vehicle maintains a 60-minute headway. There is no weekend service or service on seven nationally recognized holidays.

Lake County Public Transportation must balance the level of service provided with available funding. The current configuration of service best meets the service demands generated by the community at large, particularly as to the span, frequency and location of service needs. Lake County Public Transportation will address additional service needs as funding becomes available.

Distribution of Transit Amenities:

Lake County Public Transportation has a need for continued enhancements in transit amenities throughout the service area. These include shelters, benches, transfer site, and identifying a location for a permanent transfer site.

Passenger Shelters:

We do not currently have any passenger shelters in the system. However, when shelters are installed they will be installed along the route in an equitable manner to ensure that minority and low income neighborhoods are not overlooked.

Shelter placement will be placed in a non-capricious, race-neutral manner based upon route ridership and availability of right-of-way.

Operations Base

A central operations and maintenance facility for Lakexpress services is located at 2020 Tally Road in Leesburg, Florida. This facility provides maintenance services for the bus fleet.

Transfer Facilities:

Lake County Public Transportation uses Lake Square Mall and the Sun Bank at Citizens Boulevard for transfers. Lake County Public Transportation has identified the need for a permanent transfer facility, which will assist in improving the convenience and efficiency of its fixed route service.

Transit Construction Projects

Lake County urbanized area is under 200,000 population.

Plans for a Lake County Public Transportation Mobility Center remain in the developmental and property identification/acquisition phase. The final site (once acquired) will include a central office for operational staff and a complete maintenance facility.

Proposed Service Changes

Lake County Transportation Development Plan is updated on an annual basis, with a major update ten five years. These updates are submitted to the Florida Department of Transportation for review and approval.

We are in the process of preparing a major update of Lake County's Transit Development Plan (TDP) to the year 2020, consistent with the new TDP rule enacted by the Florida Department of Transportation in February 2007, and incorporating the entire urbanized area of the Lake-Sumter MPO.

The overall Scope of Services for the TDP Major Update project will be completed with the assistance of two of the Lake Sumter MPO general planning consultant teams of Tindale Oliver & Associates (TOA) Team and Wilbur-Smith (WS) Team.

The Transportation Development Plan (TDP) includes a comprehensive evaluation of service alternatives and realistic recommendations of service improvements proposed for the next ten years. These recommendations will be developed as a result of existing service performance evaluations, customer requests and suggestions, recent and projected regional growth indicators, road construction plans, perceived funding levels, and staff input from local jurisdictions.

ASSESSMENT OF COMPLIANCE

Lake County Public Transportation Division has reviewed the objectives of the Title VI Program and has concluded that its Title VI Program, through this report and subsequent monitoring, meets and exceeds the objectives of providing equal access to transit service and decision-making.

Further, Lake County Public Transportation Division has established a program that will evaluate system wide service changes, improvements, and expansions based on the following to ensure that benefits are distributed equally and are not discriminatory:

1. Service changes will meet Lake County Public Transportation Division overall mobility goals for the entire community;
2. Service additions are market driven based on the type of service appropriate for a market segment and travel demand;
3. Improvements to existing routes will include alignments to improve connectivity, improve travel time, night and weekend service; and increase frequencies; and
4. Capital equipment and facilities will be equitably distributed throughout the service area.

OTHER AREAS OF TITLE VI CONSIDERATIONS

Information Dissemination

In compliance with Title 49 CFR part 21, Lake County Public Transportation Division shall provide the public with information about their protections against discrimination afforded to them by Title VI. Options for notifying the public include posting Title VI information on the agency's website, using posters, sending out comment cards, and placing flyers in transit vehicles.

The notice must include the following.

A. A statement that the agency operates programs without regard to race, color, and national origin, age, gender or sexual orientation.

B. A description of the procedures that members of the public should follow in order to request additional information on the recipient's or subrecipient's nondiscrimination obligations.

C. A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient or subrecipient.

Fare increases are increases to the base full adult fare. When the full adult fare is increased, discount fares and fare media may also be increased at the same time. Fare increases are adopted by Lake County Board of County Commissioners and implemented by the Public Transportation Division. The process is as follows:

1. Prepare notices in the form of press releases, notices on-board buses, and post on the County and MPO website;
2. Schedule public hearings;
3. Notice public hearings by advertising in local news paper, and posting on aforementioned websites;
4. Hold public hearings to gain public input.

Other Activities Related to Fare Increases - Not Required

When deemed appropriate and reasonable, Lake County Public Transportation 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 increases.
2. Make presentations to local jurisdictions;
3. Make presentations to business and community groups; and
4. Publicize the fare increase via promotions on radio, television, and newspapers.
5. Post information on the Internet.

Service Reductions

Service Reductions occur when Lake County Public Transportation does the following to an individual route or to set of routes:

- A. Reduce the span of service hours (hours in a day when service operates) and/or
- B. Reduce the days in which service operates and/or
- C. Reduce the frequency of service and/or
- D. Eliminate a route in its entirety or major portion thereof, unless that route was a planned service development or experimental service that has been in existence less than two years.

Required Activities

Public involvement is required if any of the above activities impact more than 10% of an individual route total service hours or 10% of an individual route's current ridership. When Lake County Public Transportation deems that one or both criteria have been met, the following activities will occur:

1. Confer with the MPO about the changes.
2. Schedule a public hearing;
3. Publish public hearing at least 14 days in advance of the public hearing.
4. Hold public hearing to gain public input.

Capital Investments

1. Once annually, Lake County Public Transportation will develop a Capital Improvement list which will be considered at a public meeting held at the MPO.
2. The CIP shall then be incorporated into the *Transportation Improvement Program* (TIP), and submitted to the Lake-Sumter MPO.

Public comments received regarding the CIP or TIP will be considered by the Lake-Sumter MPO throughout the adoption process and incorporated into final programs.

Public Notices

When formal public notice is warranted for public hearings, Lake County Public Transportation shall publish a notice at least fourteen (14), days prior to proposed action(s) or use the procedures established by Lake Sumter MPO. The notice shall include at a minimum:

1. Proposed of 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 in which written public comment will be received;
5. Contact telephone number for public to gain additional information.
6. Lake County Public Transportation maps and schedules are available in audio. Lake County Public Transportation plans to provide the same information in both Spanish.
7. A statement informing persons with disabilities who may need assistance to participate in the public hearing with a number that they may call 48 hours in advance so they can be properly accommodated.

Public hearings conducted by Lake County Public Transportation through the Lake-Sumter MPO shall be at regularly scheduled monthly meetings that are published each year for the following year.

Public hearings by staff may be conducted at any time based on federal, state or local requirements or based on the impacts to a particular community or customer base. Notice provisions for public hearings shall be the same as those indicated above.

All public comments received through any of the means listed above will be summarized and made available to the public.

Post-grant Reviews

Review post-grant approval procedures to ensure compliance with Title VI requirements.

Limited English Proficiency

Title VI requires that FTA recipients provide Limited English Proficient (LEP) individuals with meaningful access to benefits, services, information, and other important portions of their programs and activities. Steps to ensure meaningful access include developing a Language Implementation Plan and translating Title VI obligations and complaint procedures into languages other than English. Lake County Public Transportation Division will translate any documents into other languages other than English upon requests. At such point that populations other than English speaking populations reach 25% of the total population served, and funding permits, Lake County Public Transportation will print all media in English and the alternate language.

Lake County Board of County Commission is committed to ensuring that persons with Limited English Proficiency be given a right to participate in decisions regarding public transit services.

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

To that end, Lake County provides translation and interpretation services free of charge. The County maintains a list of employees who speak different languages so whenever we encounter a customer who speaks a different language we are able to contact a translator.

It is the policy of the County to ensure that no person is denied access to transportation services, plans and programs as the result of the inability or limited ability to communicate in the English language.

In an effort to reach minority groups the County will work with faith based groups and organizations within the various communities as a means to consider the viewpoints of low income, minority, and LEP populations in the course of conducting public outreach.

All members of the public have a right to be heard regarding all projects where federal funds are being used. Individuals have a right to be integrated into every transportation decision - from the first thought about a transportation plan to post-construction operations and maintenance. The *U.S. DOT Order* applies to all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components:

- Policy Decisions.
- Systems Planning.
- Metropolitan and Statewide Planning.
- Project Development and Environmental Review under NEPA.
- Preliminary Design.
- Final Design Engineering.
- Right-of-Way.
- Construction.
- Operations and Maintenance.

In addition the County maintains the Language List that is made available to all employees that they may contact a person who speaks one of identified languages in an effort to ensure all persons have an opportunity to participate in public meetings or to communicate with staff.

We also partner with Community Health Workers Staff in order to reach individuals from diverse backgrounds in order to encourage them to participate in various governmental programs.

Lake County Language List				
First	LAST	Department	Work Phone	Language
Judy	Buckland	Community Services	(352) 253-6167	French
Scott	Amey	Community Services	(352) 383-9980	French
Laterra	Jones	Community Services	(352) 343-9400	French
Alexandra	Coons	Public Safety	(352) 343-9688	French
Stan	Springfield	Public Works	(352) 253-4992	French, Spanish, Italian
Kirsten	Mabry	Community Services	(352) 343-2525	German
Vera	Collins	Community Services	(352) 343-4101	German
Milan	Paule	Growth Management	(352) 343-9653	German, Czech
Nao	Wada	Medical Examiner's Office	(352) 326-5961	Japanese
George	Williams	Growth Management	(352) 343-9653	Korean
Richard	Leblanc, Jr.	Public Works	(352) 253-4958	Korean (Hangul), Spanish Med. Spanish, Limited German
Terry	Czigan	Community Services	(352) 253-6183	German
Ross	Pluta	Public Works	(352) 253-4933	Polish, Russian
Margarita	Castaner	Community Services	(352) 243-1840	Portuguese, Spanish

Katia	Barber	Community Services	(352) 394-4265	Portuguese, Very little Spanish
Jeff	LeTourneau	Public Safety	(352) 343-9458	Romanian
Leigh	Tucker	County Attorney	(352) 343-9787	Russian
Richard	Torres	Environmental Services	(352) 343-6030	sign language
Janie	Barron	Growth Management	(352) 343-9739	Spanish
Ramon	Hernandez	Public Safety	(352) 343-9458	Spanish
Joann	Sala	Growth Management	(352) 343-9639	Spanish
Juan	Chan	Public Works	(352) 253-4952	Spanish
Jose	Rodriguez Torrado	Public Works	(352) 742-0597	Spanish
Tony	Cuellar, Jr.	Public Safety	(352) 343-9458	Spanish
Alex	Hernandez	Growth Management	(352) 343-9641	Spanish
Eric	Palmer	Public Safety	(352) 343-9458	Spanish
John	Maruniak, Jr.	Public Works	(352) 253-4981	Spanish
Jose	Bermudez-Sanchez	Community Services	(352) 343-9753	Spanish
Bob	Armas	Public Safety	(352) 343-9458	Spanish
Francis	Franco	Growth Management	(352) 343-9739	Spanish
Alfredo	Massa, Jr.	Growth Management	(352) 343-9739	Spanish
Logan	Diaz	Public Safety	(352) 343-9688	Spanish
Magda	Contreras Cordero	Information Outreach	(352) 343-9853	Spanish
Eva	Lora	Growth Management	(352) 343-9653	Spanish
Yvonne	Mouser	Growth Management	(352) 343-9775	Spanish
Debbie	Vanier	Community Services	(352) 343-1260	Spanish
Lori	Conway	Public Works	(352) 253-4930	Spanish
Scott	Catusus	Environmental Services	(352) 742-2826	Spanish
Maria	Granado	Community Services	(352) 742-6546	Spanish
Greg	Ybarra	Public Works	(352) 787-2938	Spanish
Maria	Martino	Community Services	(352) 243-1840	Spanish
Leticia	Turcios	Community Services	(352) 742-6546	Spanish
Kristen	Wiley	Community Services	(352) 394-4265	Spanish
Lisa	Cacardo	Community Services	(352) 742-6546	Spanish
Susan	Irby	Employee Services	(352) 343-9697	Spanish
Sam	Cooper	Information Technology	(352) 343-9631	Spanish
Edith	Hendrickson	Community Services	(352) 759-9913	Spanish
Nadine	Baez	Medical Examiner's Office	(352) 326-5961	Spanish
Damian	Diaz Rivera	Public Works	(352) 253-4951	Spanish
Michael	Jimenez	Public Works	(352) 343-9682	Spanish
Pedro	Flores	Public Works	(352) 394-2559	Spanish
Mary Ellen	Roberts	Environmental Services	(352) 343-6030	Spanish (limited)
Julia	Martin	Medical Examiner's Office	(352) 326-5961	Spanish (limited)
Elise	Rainey	Community Services	(352) 669-1001	Spanish (little)
Cathie	McGwier	Environmental Services	(352) 742-2892	Spanish (minimal)
Cindy	Hall	County Manager	(352) 343-9888	Spanish (some)
Ron	Moore	Community Services	(352) 669-1001	Spanish (some)
April	Perrigo-Hoover	Public Safety	(352) 343-9898	Spanish (very basic)
Chris	Visscher	Medical Examiner's Office	(352) 326-5961	Spanish/French
Paul	Githuka	Growth Management	(352) 343-9775	Swahili, Kikuyu
Noble	Olasimbo	Public Works	(352) 253-4983	Yoruba, Igbo, Edo, West African

Environmental Justice

On February 11, 1994, President Clinton issued Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations". The county recognizes that the goal of Environmental Justice is to ensure that any adverse human health or environmental effects of any government activities do not disproportionately affect minority or low-income populations. We recognize that Environmental Justice does not intend to provide preferential treatment to these populations, but rather fair treatment to all populations.

Specific to transportation, Executive Order 12898 has been issued in order to ensure that all federally funded transportation-related programs, policies, and activities that have the potential to cause adverse affects, specifically consider the effects on minority and low-income populations.

The County is committed to the value of protecting individuals from discrimination on the bases primarily of race, color and national origin in transportation programs and activities as required under Title VI of the 1964 Civil Rights Act.

Under the Federal environmental justice guidelines minority and low-income populations are defined as:

Black - a person having origins in any of the black racial groups of Africa.

Hispanic - a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

Asian American - a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands.

American Indian and Alaskan Native - a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or recognition.

Low-Income - a person whose household income (or, in the case a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines.

In order to integrate, into environmental analysis considerations expressed in the DOT Order on Environmental Justice, recipients conducting an analysis of construction projects should incorporate an environmental justice analysis into the National Environmental Policy Act (NEPA) documentation of construction projects.

FTA recommends that recipients preparing an environmental assessment (EA) or an environmental impact statement (EIS) integrate the following components into their documents.

- Description of the low-income and minority population within the study area and the methodology used to identify the population.
- All adverse effects of the project both during and after construction that affect the identified minority and low-income population.
- All positive effects that would affect the identified minority and low-income population.
- All mitigation and environmental enhancement actions incorporated into the project to address the adverse effects.
- The remaining effects, if any, and why further mitigation is not proposed.
- For projects that traverse predominantly minority and low-income and a predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

An environmental justice analysis will be conducted in regards to all construction projects. At a minimum the following factors will be considered:

A. Does the project area contain higher than average concentrations of traditionally under-served groups when compared to the area surrounding the project area or the city or county as a whole?

B. Does the project area have a history of other projects or actions that may have had disproportionately high or adverse impacts on the local residents?

C. Are the areas in which these populations are located subject to disproportionate impacts?

D. Will the proposed project increase traffic in low-income and minority neighborhoods? If so, will the increase be greater than in non-minority or non low-income neighborhoods?

E. Will minority owned businesses that serve a minority or low-income population be impacted by the project?

F. Will access from minority or low-income neighborhoods to various services or cultural destinations (church, parks, community center) be affected by the proposed project?

G. Will the project require displacement of any minority or low-income residences? If so, are they disproportionate?

H. Will the project result in proportional change of minority or low-income household in the area that will have access to transit services reduced?

I. Are the benefits associated with the project equitable for all segments of society?

J. Have all groups within the project area been involved in the decision-making or project information process through an effective and thorough public participation effort?

All reasonably foreseeable adverse social, economic, and environmental effects on minority populations and low-income populations must be identified and addressed. Adverse effects include, but are not limited to:

- Bodily impairment, infirmity, illness, or death.
- Air, noise, and water pollution and soil contamination.
- Destruction or disruption of man-made or natural resources.
- Destruction or diminution of aesthetic values.
- Destruction or disruption of community cohesion or a community's economic vitality.
- Destruction or disruption of the availability of public and private facilities and services.
- Vibration.
- Adverse employment effects.
- Displacement of persons, businesses, farms, or nonprofit organizations.
- Increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community.
- The denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.

In the event that a disproportionately high and adverse human health or environmental effect on minority populations or low-income populations is identified, mitigation including avoidance and minimization will be considered.

In addition, disproportionate impacts on low-income and minority populations will be avoided, if practicable, that is, unless avoiding such disproportionate impacts would result in significant adverse impacts on other important social, economic, or environmental resources.

Organization and Staffing - General

The Transportation Director is responsible for ensuring the implementation of the Lake County Board of County Commission Title VI Program. The Transportation Director is responsible for the overall management and day-to-day administration of the Title VI Program and shall serve as the Title VI Specialist.

Through this program Lake County will make every effort:

Offer mobility for all citizens whether they own a vehicle or not.

Provide a basis for equitable treatment of communities being affected by transportation projects.

To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.

To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Enhance the public-involvement process, strengthen community-based partnerships, and provide minority and low-income populations with opportunities to learn about and improve the quality and usefulness of transportation in their lives.

Minimize and/ or mitigate unavoidable impacts by identifying concerns early in the planning phase and providing offsetting initiatives and enhancement measures to benefit affected communities and neighborhoods.

Improve data collection, monitoring, and analysis tools that assess the needs of, and analyze the potential impacts on minority and low-income populations.

Title VI Specialist Responsibilities

The Title VI Specialist is charged with the responsibility for implementing, monitoring, and ensuring the County's compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received by the County.
2. Collect statistical data (race, color, sex, age, disability or national origin) of participants in and beneficiaries of state highway and transportation programs, e.g., relocatees, affected citizens, and impacted communities.
3. Conduct annual Title VI reviews of program areas (planning, consultant selection) to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of operators, service providers, consultants and other recipients of federal transportation and federal-aid highway funded contracts administered through the County.
5. Participate in training programs on Title VI and other related statutes for County employees and recipients of federal transportation and federal-aid highway funds.

6. Prepare a yearly report of Title VI accomplishments and goals, as required by 23 CFR 200.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Conduct post-grant approval reviews of County programs and applicants (e.g., operators, consultants, design and relocation, and persons seeking contracts with the County), for compliance with Title VI requirements.
9. Identify and eliminate discrimination.
10. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.

Complaints

If any individual believes that she or he or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, or on the grounds of race, color, national origin, sex, disability age or income status s/he may exercise their right to file a complaint with the Lake County Public Transportation Division. Every effort will be made to resolve complaints informally at the County and consultant level.

The County will maintain a record of all complaints, lawsuits and investigation regarding alleged violation of Title VI.

There are no active lawsuits or complaints alleging discrimination on the basis of race, color or national origin with respect to service or other transit benefits.

(Please refer to Addendum I Lake County Public Transportation Division Discrimination Complaint Procedure)

B. Data Collection

Statistical data on race, color, national origin, sex, age, disability and income status of participants in and beneficiaries of federally funded program will be gathered and maintained by the Title VI Specialist. Each of the Title VI program areas will maintain data to be incorporated in the Title VI Annual Update. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

C. Title VI Program Reviews

The County's Title VI Program reviews will be performed by the Title VI Specialist to assess the County's administrative procedures, staffing, and resources available for Title VI compliance.

All programs will be reviewed annually to assure their effectiveness in compliance with Title VI provisions. This is in addition to the day to day monitoring. The Title VI Specialist will coordinate efforts to ensure their equal participation in all programs and activities at all levels.

The Title VI Specialist will conduct reviews of operators, consultants and all other subrecipients of FDOT's federal funds to ensure compliance with Title VI provisions.

D. Training Program

Title VI training will be made available at least annually to employees, operators, consultants, subrecipients, and program area specialist. The training will provide comprehensive information on Title VI provisions, application to program operations, and identification of Title VI issues and resolution of complaints. A summary of the training conducted will be reported in the Annual Report.

E. Annual Reports

An annual report will be submitted to the FDOT District Five's Title VI Coordinator reviewing Title VI accomplishments achieved during the year. The Title VI Specialist will be responsible for coordination and preparation of the report. A Title VI Annual Report will be submitted to FDOT by June 1st of each year. The report will describe the accomplishments and changes to the program occurring during the preceding year, and will also include any changes to the goals and objectives for the upcoming year.

Reports will also be provided to the Federal Transit Administration as required by law.

F. Public Dissemination

The Title VI Specialist will disseminate Title VI Program information to Lake County Public Transportation employees, operators, subrecipients, consultants, and beneficiaries as well as the general public.

Public dissemination will include the posting of public statements on the County's website, inclusion of Title VI language in contracts, and publishing annually the Title VI Policy Statement in newspapers having a general circulation in the vicinity of proposed projects and announcements of hearings and meetings in minority publications.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, national origin, age, gender, or sexual orientation under any program or activity that receives Federal financial assistance.

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

To that end, Lake County provides translation and interpretation services free of charge. The County maintains a list of employees who speak different languages so whenever we encounter a customer who speaks a different language we are able to get a translator.

It is the policy of the County to ensure that no person is denied access to transportation services, plans and programs as the result of the inability or limited ability to communicate in the English language.

In an effort to reach minority groups the County will work with faith based groups and organizations within the various communities as a means to consider the viewpoints of low income, minority, and LEP populations in the course of conducting public outreach.

All members of the public have a right to be heard regarding all projects where federal funds are being used. Individuals have a right to be integrated into every transportation decision - from the first thought about a transportation plan to post-construction operations and maintenance. The *U.S. DOT Order* applies to all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components:

- Policy Decisions.
- Systems Planning.
- Metropolitan and Statewide Planning.
- Project Development and Environmental Review under NEPA.
- Preliminary Design.
- Final Design Engineering.
- Right-of-Way.
- Construction.
- Operations and Maintenance.

Citizens may obtain information by contacting the following offices:

Lake County Board of County Commission

Public Transportation Division
315 W. Main Street
Tavares, Florida 32778

Public Transportation Division
Kenneth Harley
Transportation Director
(352) 742-6580

LAKE~SUMTER METROPOLITAN PLANNING ORGANIZATION

***1616 South 14th Street
Leesburg, FL 34748***

Lake Sumter MPO
T. J. Fish
Executive Director
(352) 315-0170

Title VI Specialist
Michael F. Woods
Transportation Planner
(352) 315-0170

Remedial Action

The County will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, corrective action will be taken to resolve Title VI issues, and reducing to writing a remedial action agreed upon to be necessary, all within a period not to exceed 90 days.

1. Subrecipients placed in a deficiency status will be given a reasonable time, (not to exceed 90 days after receipt of the deficiency letter), to voluntarily correct deficiencies.
2. The County will seek the cooperation of the subrecipient in correcting deficiencies found during the review. The County will also provide the technical assistance and guidance needed to aid the subrecipient to comply voluntarily.
3. When a subrecipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the County will submit to FDOT's Civil Rights Office and or the FTA two copies of the case file and a recommendation that the subrecipient be found in noncompliance.
4. A follow-up review will be conducted within 180 days of the initial review to ensure that the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously identified.

Title VI Responsibilities for Program Areas

Lake County Public Transportation Division works under the direction of the Lake County Community Services Department. Lake County Public Transportation contracts operations of the services to MV Transportation and works in cooperation with the Lake-Sumter MPO and we review all service delivery and capital program decisions for opportunities to increase service performance and efficiency. All agencies conduct reviews and incorporate customer requests and comments into service changes and proposed future changes. The agencies coordinate service change work tasks to ensure proper and timely implementation, assist in prioritizing short range service changes, and to insure equity and accessibility of service.

Lake Sumter MPO recommends to Lake County Public Transportation Division both short and long range service changes. Once accepted Lake Sumter MPO recommendations are incorporated within the Lake –Sumter Transportation Development Plan. The Lake –Sumter Transportation Development Plan is updated on an annual basis, with a major update every five years. These updates are submitted to the Florida Department of Transportation for review and approval.

Lake County Public Transportation is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities - the delivery of equitable and accessible transportation services. Lake County recognizes its responsibilities to the communities in which it operates and to the society it serves. It is Lake County's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit service delivery and related benefits.

Toward this end, it is Lake County's objective to:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- C. Promote the full and fair participation of all affected populations in transportation decision making;
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- E. Ensure meaningful access to programs and activities by persons with limited English proficiency.

Planning

LAKE~SUMTER METROPOLITAN PLANNING ORGANIZATION

LAKE~SUMTER METROPOLITAN PLANNING ORGANIZATION has the responsibility to develop long- and short-range plans to provide efficient transportation services to the citizens of the Lake and Sumter Counties.

LAKE~SUMTER METROPOLITAN PLANNING ORGANIZATION annually updates and coordinates the MPO's future transportation improvement plans and programs. A comprehensive transportation planning process is used which incorporates input from the public in coordination with the various jurisdictions affected. Planning includes the monitoring and collection of data. . Title VI responsibilities include but are not limited to:

1. Ensure that all aspects of the planning process operation comply with Title VI of the Civil Rights Act of 1964.
2. Ensure that various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic/gender related organizations and participating in roundtable meetings in predominantly minority communities.
3. Assist the Title VI Specialist in gathering and organizing the Planning section of the Annual Title VI Update Report.
4. Review the department's work program and other directives to ensure compliance with Title VI and other nondiscrimination program requirements.
5. Attend public meetings to verify the level of participation of Title VI protected group members when offered in predominantly ethnic minority communities.

Consultant Services

Contracting Services

The Procurement Department of Lake County is responsible for setting policy and establishing procedures for consultant selection, negotiation, and administration of consultant contracts for the County. Title VI responsibilities include but are not limited to:

1. Monitor DBE program requirements.
2. Ensure that all consultant contracts administered by the County have the appropriate Title VI provisions included.
3. Review directives and procedures to ensure Title VI compliance.
4. Maintain necessary data and documentation required for completion of the department's Title VI Annual Report.

Addendum I

Lake County Public Transportation Division Discrimination Complaint Procedure

Formal Complaints

Any person who believes the he or she, or any specific class or persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a formal written complaint. All formal written complaints received by the County shall be referred immediately by the County's Title VI Specialist to FDOT District Five's Title VI Coordinator for processing in accordance with approved state procedures. Formal complaints may be filed using Exhibit A of this policy.

Filing a Title VI Complaint with the FTA

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin by a recipient of Federal Transit Administration funding can file an administrative complaint with the Federal Transit Administration's Office of Civil Rights under Title VI of the Civil Rights Act of 1964.

FTA investigates complaints on the basis of intentional discrimination or on the basis of disparate impact discrimination, where a neutral policy or practice has the effect of disproportionately excluding or adversely affecting minority beneficiaries or other protected individuals and the recipient's practice lacks a substantial legitimate justification.

Under the Executive Order on Environmental Justice and the U.S. Department of Transportation's Order to Address Environmental Justice in Minority Populations and Low-Income Populations, a member of the public, a group of people, or their representatives can file an administrative complaint against a recipient of financial assistance from FTA, a transportation provider, a transportation-related entity, or FTA itself alleging discrimination and/or adverse environmental effects, including social and economic effects, against a specific minority or low income community or population group, due to a project or activity funded or carried out by DOT.

Individuals and organizations may file a complaint by completing the FTA Title VI complaint form attached as Exhibit B. Complaints should be signed and include contact information and should be sent to:

**Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590**

FTA strives to promptly investigate the complaints received. At the conclusion of their investigation FTA will transmit a letter of finding to the complainant and the recipient. If FTA investigation determines that the recipient is not in violation of Title VI, FTA letters will explain why the recipient was found in compliance. If FTA determines that a recipient is in violation of Title VI, FTA letters will document the violation and instruct the recipient to take action to come into compliance.

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because he or she has either filed a complaint to secure rights protected by the nondiscrimination statutes we enforce. Any individual alleging such harassment or intimidation may file a complaint with the Federal Transit Administration. We would investigate such a complaint.

Informal Complaints

Oral complaints received by the County shall be resolved informally by the County's Title VI Specialist. If the allegation(s) raised is not satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the County's Title VI Specialist shall refer the complainant to FDOT District Five's Title VI Coordinator for processing in accordance with approved state procedures.

The County's Title VI Specialist will advise FDOT District Five's Title VI Coordinator within five (5) calendar days of receipt of an oral complaint. The following information will be included in every notification:

- a) Name, address, and phone number of the complainant.
 - b) Name(s) and address(es) of the respondent(s).
 - c) Basis of the complaint.
 - d) Date of the alleged discriminatory act(s).
 - e) Date the complaint was received by the County.
 - f) A statement of the complaint.
 - g) Other agencies where the complaint has been made.
 - h) An explanation of the actions taken or proposed by the County to resolve the allegation(s) raised in the complaint.
1. Within ten (10) calendar days, the County's Title VI Specialist will acknowledge receipt of the allegation(s), inform the complainant of action taken or proposed to resolve the allegation(s), and advise the complainant of other avenues of redress available, such as FDOT's Equal Opportunity Office (EEO).
 2. Within sixty (60) calendar days, the County's Title VI Specialist will conduct and complete a review of the allegation(s) and, based on the information obtained, will render a recommendation for action in a report of findings to the Chair of the Board of County Commission or designee.
 3. Within ninety (90) calendar days, the Chair of the Board of County Commission or designee will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the

complainant of his or her right to file a formal written complaint with FDOT's EOO if dissatisfied with the final decision reached by the County. The County's Title VI Specialist also will provide FDOT District's Five's Title VI Coordinator with a copy of this decision and report findings.

4. The County's Title VI Specialist will maintain a log of all oral complaints received by the County. The Log will include the following Information:
 - i) Name, address, and phone number of the complainant.
 - j) Name(s) and address(es) of the respondent(s).
 - k) Basis of the complaint.
 - l) Date of the alleged discriminatory act(s).
 - m) Date the complaint was received by the County
 - n) A statement of the complaint.
 - o) Other agencies where the complaint has been made.
 - p) An explanation of the actions the County has taken or proposed to resolve the allegation(s) raised in the complaint.

EXHIBIT A

**Lake County Public Transportation
Title VI Complaint Form**

Section I

Name: _____ Address: _____

City: _____ State: _____ Zip Code: _____

Phone numbers: (Home) _____ (Work) _____ (Cell) _____

Electronic Mail Address: _____

Accessible Format Requirements? Large Print _____ Audio tape _____

TDD _____ Other please specify _____

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

Have you previously filed a Title VI complaint with Lake County? Yes _____ No _____

If yes, what was your Complaint Number? _____

Have you filed this complaint with any of the following agencies?

Transit Provider _____ Department of Transportation _____

Department of Justice _____ Equal Employment Opportunity Commission _____

Federal Transit Administration _____ Other _____

Have you filed a lawsuit regarding this complaint? Yes _____ No _____

If yes, please provide a copy of the complaint form.

Section IV

Name of Agency complaint filed with: _____

Contact person: _____ Title: _____

Telephone number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

Please sign here: _____ Date: _____

[

Please mail your completed form to:

Lake County Board of County Commission
Public Transportation Division
Title VI Complaint
315 W. Main Street
Tavares, Florida 32778

Exhibit B

**Federal Transit Administration
Office of Civil Rights
Complaint Form**

Section I

Name: _____ Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Numbers: (Home) _____ (Work) _____ Cell _____

Electronic Mail Address: _____

Accessible Format Requirements?

Large Print _____ Audio tape _____

TDD _____ Other _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations," and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

In the FTA complaint investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. FTA also may refer the matter to the U.S. Department of Justice for enforcement.

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

Have you previously filed a Title VI complaint with FTA? Yes ____ No ____

If yes, what was your FTA Complaint Number? _____

[Note: This information is needed for administrative purposes; we will assign the same complaint number to the new complaint.]

Have you filed this complaint with any of the following agencies?

Transit Provider ____ Department of Transportation ____

Department of Justice ____ Equal Employment Opportunity Commission ____

Other _____

Have you filed a lawsuit regarding this complaint? Yes ____ No ____

If yes, please provide a copy of the complaint form.

[Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the court.]

Section IV

Name of public transit provider complaint is against:

Contact person: _____ Title: _____

Telephone number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the transit provider?

Yes ____ No ____

May we release your identity to the transit provider?

Yes ____ No ____

Please sign here: _____

Date: _____

[Note - We cannot accept your complaint without a signature.]

Please mail your completed form to:

**Director
FTA Office of Civil Rights,
400 7th Street, S.W., Room 9102,
Washington, D.C. 20590**