



Metropolitan Atlanta Rapid Transit Authority Title VI Program Update 2013



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Metropolitan Atlanta Rapid Transit Authority Title VI Policy Statement

It is my firm belief that the manner in which the Metropolitan Atlanta Rapid Transit Authority (MARTA) treats people, whether employees or the general public whom we serve, directly correlates to the commitment MARTA makes and the acceptance of its responsibility to provide essential services designed to enhance the quality of life for residents and guests of the Metropolitan Atlanta Region. MARTA, as a recipient of funds administered by the U.S. Department of Transportation, enforces Title VI of the Civil Rights Act of 1964, as amended, through its policy and procedures. Collectively they require 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 otherwise subjected to discrimination in any program or activity. Prohibited practices include but are not limited to:

- Denying a person any service or benefit because of race, color, or national origin;
- Providing a different service or benefit, or providing services or benefits in a different manner;
- Locating facilities in a way that would limit or impede access to a federally funded service or benefit.

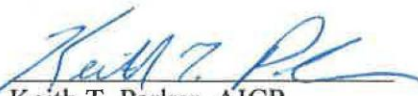
The Environmental Justice component of MARTA's policy is based on Title VI and FTA Circular mandates which guarantee fair treatment for people of all races, cultures, and incomes regarding the development of Environmental Justice practices. Therefore MARTA will:

- Ensure the involvement of low-income and minority groups in the decision making process;
- Safeguard low-income and minority groups against disproportionately high and adverse human health or environmental impacts of its programs, policies and activities;
- Ensure that low income and minority groups receive their fair share of benefits.

The Executive Director of Diversity and Equal Opportunity (DEO) is responsible for initiating and monitoring Title VI activities, preparing required reports and ensuring that MARTA adheres to other compliance responsibilities as required by applicable regulations. The Title VI Program provides the direction and program structure for ensuring compliance with Title VI and focuses on the functional responsibility of the DEO Office. However, I also expect every MARTA manager, supervisor and employee to be aware of and apply the intent of Title VI when performing duties. MARTA will not tolerate discrimination against any participant or beneficiary of MARTA services by an employee in the performance of assigned duties or implementation of a departmental policy or practice.

In the event MARTA distributes federal funds to another entity, MARTA will monitor and ensure the compliance of each contractor at any tier and each sub-recipient at any tier under the project, with all requirements prohibiting discrimination on the basis of race, color, or national origin; and will include non-discrimination language in all written agreements. Any person believing they have been discriminated against based on race, color, or national origin in the provision of services, programs, activities, or benefits, may file a formal complaint directly with the Diversity and Equal Opportunity Office or with the Federal Transit Administration.

It is with that firm resolve that I fully commit the Authority's resources to ensure that we remain compliant on all aspects of Title VI of the Civil Rights Act of 1964, as amended.


Keith T. Parker, AICP
General Manager/CEO

1-31-13
Date

I. Introduction And Title VI Program Overview

The Metropolitan Atlanta Rapid Transit Authority (MARTA)

The Metropolitan Atlanta Rapid Transit Authority (MARTA) is the rapid transit system in the Atlanta Georgia metropolitan area and the ninth largest in the United States. MARTA operates almost exclusively in Fulton and DeKalb counties, with bus service to destinations in Cobb County (Six Flags over Georgia and the Cumberland Transfer Center next to the Cumberland Mall), and a single rail station in Clayton County at Hartsfield-Jackson Atlanta International Airport. The MARTA service population is about 1.7 million in the City of Atlanta, Fulton and DeKalb counties. The average total daily ridership for the system (bus and rail) is 450,000 passengers. MARTA also operates a separate para-transit service for individuals with disabilities.

In accordance with the requirements of Federal Transit Administration (FTA) Circular 4702.1B, Chapter III, Part 4, MARTA developed a triennial Title VI Program which defines the commitment, made by MARTA, to the tenets of the Civil Rights Act of 1964, as amended, and necessitates the assurance of equal access and the equitable delivery of transit services and amenities to patrons throughout its service area. The MARTA Title VI Program was reviewed and approved by all internal stakeholders including the MARTA Board (**Exhibit 1**).

To this end, Keith T. Parker, AICP, General Manager/CEO of MARTA, is ultimately responsible for the overall implementation, administration and monitoring of the Title VI Program. In turn, the MARTA CEO has delegated this responsibility to Ferdinand L. Risco Jr., MBA, Executive Director of the Office of Diversity and Equal Opportunity (DEO), who maintains a dotted line reporting relationship with the Office of the General Manager/CEO.

The Executive Director of DEO develops, directs and manages the agency's strategic, long range and short range Title VI Program endeavors to ensure that they align with the overarching efforts of the organization. More specifically, the Executive Director of DEO provides strategic oversight for the MARTA Title VI Program updates, offers assurances to FTA of compliance, and communicates compliance status information to the MARTA General Manager/CEO, Executive Management Team, and Board of Directors. This is accomplished through the continuous review and monitoring of policies, procedures, practices, compliance audit findings, fixed facility analyses, planning processes, and systemic collaborations and partnerships.

Under the leadership of the Executive Director, the following DEO professional staff members also support the objectives of the Title VI Program:

Joyce D. Brown, MLHR, the Manager of Equal Opportunity and Conflict Resolution, provides daily management oversight of the development and administration of the Title VI Program and responds to FTA compliance audits. She is aided in this regard by the MARTA Equity Administrator.

Diana Darris, MJPS, is the MARTA Equity Administrator. In this capacity, she provides continuous review and monitoring of policies, procedures, fixed facility analyses, programming process and resulting programs. She also ensures that outreach, special transit training, communication programs and the distribution of information in alternative formats meets Title

VI and Limited English Proficiency (LEP) requirements. Her additional responsibilities, as the Equity Administrator, include the following:

- Processing the disposition of Title VI complaints received by MARTA.
- Collecting statistical data (race, color, sex, and national origin) of participants in, and beneficiaries of federally funded programs.
- Reviewing Environmental Impact Statements prepared by MARTA for Title VI and Environmental Justice compliance.
- Conducting annual Title VI reviews of special emphasis program areas (education and training, environmental affairs, and consultant contracts) to determine the effectiveness of program activities at all levels.
- Conducting Title VI reviews of all consultant contractors and sub-recipients of federal funds directly distributed by MARTA.
- Reviewing the MARTA work program in coordination with Title VI liaisons for special emphasis program areas and where applicable include Title VI language and related requirements.
- Assisting the MARTA Executive Management Team in the distribution of information on training programs regarding Title VI and related statutes.
- Developing Title VI information for dissemination to the general public and where appropriate provide versions in languages other than English.
- Identifying, investigating, and eliminating discrimination when found to exist.
- Establishing procedures for promptly resolving deficiencies and producing written documentation of any remedial action that is necessary within a period not to exceed 90 days.

In tandem with the above, the DEO Office is charged with the development, implementation, coordination, and monitoring of all Civil Rights programs required by Board policies, Title VI and other federal regulations. The Office ensures that MARTA effectuates an equitable distribution of transit services and benefits, while clearly exhibiting a non-discriminatory impact in agency decisions and activities. This dictates that DEO must continually design, update, modify and implement Title VI and Environmental Justice programs, which facilitate the effective review, monitoring, and measuring of equality in access, transit services and the distribution of transit amenities. DEO is also responsible for assisting MARTA in strategically targeting outreach efforts that are designed to solicit and gauge community input from minority, low income and transit dependent areas before completing the development of programs or transit related decisions.

Authorizing Legislation for the Title VI Program

The Title VI mandate 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 permeates all MARTA programs and activities. Further broadening the scope of Title VI, the Civil Rights Restoration Act of 1987 expanded the definition of “programs or activities” to include all programs or activities of federal aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not [Pub. L. No. 100-259, 102 Stat. 28 (1988)].

The additional authorities and citations that espouse the MARTA Title VI Program include:

- Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000 et seq.
- FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients.
- 49 CFR, Part 21, effectuates the provisions of Title VI of the Civil Rights Act of 1964.
- 28 CFR § 50.3, Department of Justice (DOJ) Guidelines for the Enforcement of Title VI of the Civil Rights Act of 1964.
- DOT LEP Guidance, 70 FR 74087, December 14, 2005 (based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects limited English proficient persons).
- Executive Order 12898, Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.
- DOT Update Order 5610.2(a), “Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” 77 FR 27534, May 10, 2012.
- FTA Circular 4703.1, “Environmental Justice Policy Guidance for Federal Transit Administration Recipients,” August, 15, 2012.
- Section 12 of the FTA Master Agreement in which MARTA, as a recipient of Federal funding, agreed to comply and assure the compliance of each sub-recipient, lessee, third party contractor, or other participant at any tier of any project (**Exhibit 2**).
- 23 United States Code 109(h), Highway – Standards.
- “Standard DOT Title VI Assurance”, Department of Transportation Order 1050.2.
- Joint Programming Regulations of the Federal Transit Administration and the Federal Highway Administration, 23 CFR Part 450 and Part 613.
- Section 12(f) of the Urban Transportation Act of 1964, as amended, 49USC 1608(f).
- Executive Order 12250, Coordination of Grant Related Civil Rights Statutes.
- Title II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. 4621-4655.

Program Objectives

MARTA, committed to preventing discrimination and fostering equity as prescribed under Title VI, recognizes the key role that transportation services provide to the community. Therefore, in accordance with FTA Circular 4702.1B, Chapter 2, Part 1, MARTA established the following basic principles to serve as overall objectives in implementing its Title VI Program:

- Ensuring that the level, quality and delivery of public transportation service is provided to low income and minority populations in a non-discriminatory manner in full compliance with Title VI and FTA Circular 4702.1B.
- Ensuring the promotion of inclusive and fair participation in the MARTA decision-making process without regard to race, color, or national origin.
- Ensuring the provision of meaningful access to programs and activities by persons with limited English proficiency including the provision of information in other languages.
- Encouraging participation by minorities and low income populations as members of programming or advisory bodies.
- Ensuring that sub-recipients adhere to the non-discrimination requirements prescribed in Title VI and FTA Circular 4702.1B, Chapter III, Part 9.

II. Title VI Program Overview

Title VI Assurances and Certifications

In accordance with 49 CFR Section 21.7(a) and FTA Circular 4702.1B, Chapter III, Parts 2 and 12, the required certifications and assurances were compiled for Federal Transit Administration (FTA) assistance programs. In compliance, MARTA filed a single certification annually with FTA that covered all the programs for which it anticipated submitting an application. The terms of this overarching certification and assurance reflected the applicable requirement of the FTA legislation currently in effect.

MARTA understood and agreed that certifications and assurances were special pre-award requirements specifically prescribed by Federal law or regulation and therefore did not encompass all Federal laws, regulations, and directives that may have applied to MARTA or its project. A comprehensive list of those Federal laws, regulations, and directives are contained in the FTA Master Agreement.

As part of a federal grant process, MARTA documented its ability and willingness to comply with various federal regulations by signing the annual FTA Certifications and Assurances for FY 2013 (**Exhibit 3**).

MARTA sub-recipients included organizations that received Federal assistance, which were awarded through MARTA rather than by the FTA directly. Although under certain grants, MARTA may have delegated any or almost all project responsibilities to one or more sub-recipients, MARTA understood that it was ultimately accountable to FTA for the sub-recipient's compliance with all applicable federal laws, regulations, and directives, except to the extent that FTA determined otherwise in writing. Therefore, MARTA monitored its sub-recipients accordingly to ensure that sub-recipients were in compliance with the mandates of Title VI and all related FTA requirements. The detailed procedures in relation to the monitoring of sub-recipients are outlined in Chapter III of this Title VI Program under the heading of *Sub-recipient Assistance and Monitoring*.

The MARTA sub-recipients are: DeKalb County Human and Community Development Department's Office of Senior Affairs in Lithonia, Georgia (DeKalb County) and Rockdale County Recreation and Senior Services Department in Conyers, Georgia (Rockdale County). Both sub-recipients also executed Sub-grant Agreements, which included the relevant certifications and assurances as applicable to the program and project for which the sub-recipient was expending the FTA assistance (**Exhibit 4-A and 4-B**).

Notification to Beneficiaries of Protection Under Title VI

In compliance with FTA Circular 4702.1B, Chapter III, Part 4, Section a(1) and Part 5 and 49 CFR Section 21.9(d), MARTA informed the public of their rights under Title VI by dissemination of Title VI notices and ensuring that such notices were translated into other languages as needed. The process of notifying the public was consistent with the DOT LEP Guidance and the MARTA LEP Plan. Dissemination of the Title VI Notice to the public included the MARTA website, brochures and printings in ridership literature. The notices on the website can be converted into a variety of languages including: Spanish, Korean, Chinese, Japanese, French and German. MARTA has also disseminated notices, including signage, in Reduced Fare

Office, ride stores and all transit stations. A sample of the MARTA Title VI Notice is attached (**Exhibit 5**).

Title VI Complaint Procedures and Complaint Form

During this Plan period; MARTA did not have any Title VI Lawsuits and very few investigations or complaints (**Exhibit 6**). MARTA instituted a methodology to track and resolve Title VI complaints, inquires, issues or matters at the lowest possible level. All Title VI complaints and inquiries are tracked and monitored by the Equity Administrator. As part of the monitoring and tracking process all complaints and inquiries are coded based on race, color, national origin or low-income status as applicable. They are then logged and maintained in DEO's electronic database for individual resolution and trend analysis. When the data is analyzed, if patterns are noted, DEO takes proactive measures to correct the issue at the lowest possible level including but not limited to: individual employee counseling, management consultation, recommending disciplinary action, refresher training, and other recommendations to prevent and/or minimize any disparate impact, burden or treatment among customers from minority and/or low income communities. In addition, recommendations for the resolution of a systemic service delivery issue are also addressed through the Title VI/LEP Advisory Committee. As a result of the proactive measures taken to resolve customer concerns at the lowest level possible, this has greatly decreased the filing of complaints that requires Title VI investigations.

If an individual wishes to file a Title VI complaint, MARTA has developed and implemented Title VI Complaint Procedures for investigating and tracking Title VI complaints and also has a Title VI Complaint Form (**Exhibit 7**). Both the Title VI complaint procedures and the form are available to the public and posted on the MARTA website. The Title VI Complaint process is also communicated to the public through station signage. Information on how to file a Title VI Complaint is available in alternative formats and languages. The process of filing a Title VI complaint has also been explained internally through the Title VI/LEP Committee, Executive Management Team presentations and employee training.

Any person who believes himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color, or national origin may by himself or by a representative file a written complaint with MARTA within **180** days after the date of the alleged discrimination at: MARTA's Office of Diversity and Equal Opportunity Office, 2424 Piedmont Road NE, Atlanta Georgia 30324-3330, 404-848-5000 (voice). Failure to file within **180** days may result in dismissal of the inquiry or complaint. In addition, any person who believes himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color, or national origin may by himself or by a representative file a complaint with the Federal Transit Administration (FTA) no later than **180** days after the date of the alleged discrimination at: Federal Transit Administration (FTA), Office of Civil Rights, 230 Peachtree Street, N.W., Suite 800, Atlanta, GA 30303, 404-865-5600 (voice).

Inclusive Public Participation

MARTA supports, values and promotes the inclusive public participation of minority, low income and LEP populations. In order to expand public participation, MARTA works in close collaboration and partnership with other departments. To this end, the Department of Communications and External Affairs carries a vital role in support of the Title VI Program through the implementation of community outreach, communication programs and strategic

marketing initiatives. In addition, the department has ongoing interactions with transit riders, advocacy groups, government entities, media outlets, and the general public.

Communications and External Affairs has multiple offices that assist in the acquisition of information needed to monitor Title VI compliance, identifies potential Title VI issues, and measures the effectiveness of any required corrective actions:

- The Office of External Affairs, Government and Constituent Relations, and Community Relations are responsible for directing, developing and maintaining positive and effective relations with the community and various levels of government (federal, state and local) that interface with or impact the development of programs and operations.
- The Office of Marketing and Communications is responsible for creating all communications for daily riders, social media (Facebook, YouTube and Twitter) and implementing strategic marketing initiatives.
- The Office of Media Relations establishes and maintains active working relationships with all relevant local, national, minority and industry-wide media in order to communicate pertinent information to constituencies, including service changes and enhancements, emergency situations posing an immediate threat to the safety and security of MARTA customers or its service area, and policy changes.
- The Customer Services Branch is responsible for documenting, tracking, investigating and providing responses to customer complaints or concerns through the Customer Service Center including investigating Breeze Card fare dispute claims and capturing customer feedback comments, suggestions, recommendations and commendations. In addition, the Branch included the Reduced Fare program and administers the discount fare for seniors and individuals with disabilities. The Customer Information Center also provides bus and rail schedule information and trip itinerary planning services. Any formal complaint that may be Title VI related is referred to the Office of Diversity and Equal Opportunity for review and response.

The specific Title VI-related tasks that External Affairs carries out through its various offices are as follows:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP populations.
- Ensuring different meeting group sizes and formats at community meetings and public hearings.
- Coordinating with community and faith-based organizations, educational institutions and other organizations to implement public engagement strategies that target members of affected minority and/or LEP communities.
- Utilizing radio, television, or newspaper ads on stations and in publications that serve LEP populations.

- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Public Hearings and Public Outreach

MARTA has developed a Public Hearing Policy and Procedure and updated Community Outreach Procedures to establish guidelines for conducting public hearings and outreach in relation to Title VI, minority and low-income population groups (**Exhibit 8**). Using these procedures, MARTA conducted public hearings, which gave patrons the opportunity to offer ideas about how MARTA could design and improve its services to meet public needs. In keeping with Title VI and Environmental Justice requirements, the communication program included: community forums; meetings with local, state and federal stakeholders; news releases; public hearings; meetings with businesses and professional associations; meetings with the representatives from the faith based communities; advertisement of public hearings in a multiple of local newspapers; information sessions before public hearings; publishing of fare and route service changes on the MARTA website; the distribution of fact sheets/notices/announcements to various LEP Organizations in different languages; and making all required information and communications be available in alternative format (i.e., sign-language, caption, large print, CD, braille, etc...).

Under the provisions of the Urban Mass Transportation Act of 1964, as amended, and the MARTA Act, MARTA was required to establish a process to receive and consider public comment prior to fare changes and major service reductions. In connection to service and fare changes, MARTA conducted multiple community forums which provided information to patrons that allowed them an opportunity to provide input about how MARTA could improve its service to better meet public needs and still address its deficit in operating funds. These forums were structured such that electronic depictions of route modifications and deletions were displayed on a large screen which enabled all attendees to point out certain demographics and other points of information that should be considered in redesigning bus routes. The public hearings and the community forums yielded information that MARTA was unaware of and did use in making modifications to the initial proposals which were put forth.

Because the MARTA service area encompasses the City of Atlanta, Fulton County and DeKalb County, MARTA is obligated to reach out and inform the public in these geographic areas. Therefore, MARTA held community forums and public hearings at multiple transit and ADA accessible locations during various times as outlined below:

FY 2010 Public Hearings (Exhibit 9-A)

Topic:	Proposed service modifications to bus routes.
Advertisements:	MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper and Mundo Hispanico newspaper.
Distribution:	Bus and rail station announcements (10,000) and E-mail blast (4,500)

Date: January 25, 2010
Location: Atlanta City Hall, Atlanta, GA

Date: January 25, 2010
Location: Decatur City Hall, Decatur, GA

Topics: Proposed route service modifications, rails service modifications, fare increase, FY2011 proposed budgets and proposed bus route service elimination.

Advertisements: MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACE III/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and South DeKalb Malls, neighborhood newspapers (North and Mid-DeKalb, North and South Fulton and Northside/Atlanta, GA Asian Times, Multicultural Flyers (translated into Korean, Vietnamese and Chinese), MARTA high traffic stations (Five Points, Lindbergh, College Park, H.E. Holmes and Kensington) and social media (Twitter and Facebook).

Announcements: Buses and Rail Stations (100,000), E-mail blast (6,500), South Fulton Regional Library, South Fulton Government Center, Fairburn Library, Trinity Towers, Morehouse College, College Park Library, College Park City Hall, Fairburn City Hall, Welcome All Recreation Center, Adamsville Recreation Center, Wheat Street Baptist Church, Auburn Neighborhood Senior Center, Peachtree Road United Methodist Church, Peachtree Presbyterian Church, Mount Vernon Presbyterian Church, Elizabeth Baptist Church, Love Center Church, Cascade United Methodist Church, Woods Memorial Baptist Church, New Birth Church, Ray of Hope Church, Chapel Hill Harvester Church, World Changers Church, Mouth Carmel Baptist Church, East Point Mallalieu Church, Greenforest Church, New Pin Grove Baptist Church, Concerned Black Clergy organization, DeKalb County Public Library (21 branches), South DeKalb Legislative Community Cabinet (125 members) and Everest Institute Decatur Campus (150 contacts).

Date: Monday, June 7, 2010
Location: Roswell City Hall, Roswell, GA

Date: Monday, June 7, 2010
Location: South Fulton Service Center, College Park, GA

Date: Tuesday, June 8, 2010
Location: City Hall, Atlanta, GA

Date: Tuesday, June 8, 2010
Location: Maloof Auditorium, Decatur, GA

FY 2011 Public Hearings (Exhibit 9-B)

Topic: Atlanta Braves Baseball Stadium Shuttle Restoration.

Date: Monday, March 21, 2011
Location: Roswell City Hall, Roswell, GA

Date: Monday, March 21, 2011
Location: South Fulton Service Center, College Park, GA

Date: Thursday, March 24, 2011
Location: Adamsville Recreation Center

Date: Thursday, March 24, 2011
Location: City Hall, Atlanta, GA

Date: Thursday, March 24, 2011
Location: Maloof Auditorium, Decatur, GA

Topics: Proposed service modifications for September 24, 2011 and the proposed fare increases for October 2, 2011.

Advertisement: MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-Metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACEIII/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and social media (Twitter and Facebook).

Flyer Distribution: Chinese Community Center
Dinho Super Market
Vietnamese Market/Buford Highway
Hong Kong Market-Jimmy Carter Blvd.
Super H-Market-Doraville/Peachtree Industrial Blvd. & I-285
Happy Valley Restaurant-Jimmy Carter Blvd.
Buford Farmers Market Media Distribution Desk
Asian American Resource Center, Gwinnett County
Korean Community Center-Buford Highway
Ho Pin Market Media Table
Atlanta Chinese Community Church
Center for Pan Asian American Community Services
Stewart Avenue-Lakewood Library
Peachtree Street Branch Library
Atlanta Regional Commission (ARC) PIAG Post (week of May 9, 2010)

Date: Monday, May 16, 2011
Location: Fulton County Government Building, Atlanta, GA

Date: Monday, May 16, 2011
Location: South Fulton Service Center, College Park, GA

Date: Tuesday, May 17, 2011
Location: Maloof Auditorium, Decatur, GA

Date: Tuesday, May 17, 2011
Location: North Fulton Service Center, Sandy Springs, GA

FY 2012 Public Meeting and Public Hearings (Exhibit 9-C)

Topic: A public hearing on the proposed bus service modifications.

Advertisement: MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-Metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACEIII/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and social media (Twitter and Facebook) and flyers distributed in Chinese, Korean and Vietnamese.

Date: Tuesday, January 24, 2012
Location: City Hall, Atlanta, GA

Date: Thursday, January 26, 2012
Location: Maloof Auditorium, Decatur, GA

Topic: A preliminary public meeting forum to discuss the final phase in a three year staggering of the mobility service and reduced fare increase that first became effective in October 2012 and culminates in fiscal year 2013.

Advertisement: Signs were placed in fixed route and para-transit buses in both English and Spanish. In addition, data was provided to riders on para-transit. MARTA also provided data on the telephone call-in system to advise para-transit riders about the public hearing and the fare increase.

Date: Tuesday, May 8, 2012
Location: MARTA Headquarters Building, Ground Floor Atrium

MARTA staff provided:

- A brief overview of the MARTA Fiscal Year 2013 budget.
- An explanation of the final phase of a three year staggering fare increase.
- October 2010 staggered increases may impact seniors and individuals with disabilities.
- An opportunity to submit comments to the MARTA Board of Directors.
- A brief overview of the TIA/MARTA Transit Projects.
- Free transportation from MARTA Headquarters to the MARTA annex building and return to headquarters.

Topic: Public hearings to discuss the last segment in the staggering fare increase on reduced (half-fare) and mobility services and the proposed Fiscal Year 2013 operating and capital funds budget were heard.¹

Date: Tuesday, May 15, 2012
Time: Community Exchange- 6:00-7:00 p.m. and Hearing-7:00 p.m.
Location: Maloof Auditorium, Decatur, GA

Date: Tuesday, May 15, 2012
Time: Community Exchange- 6:00-7:00 p.m. and Hearing-7:00 p.m.
Location: North Fulton Service Center, Sandy Springs, GA

Date: May 17, 2012
Time: Community Exchange -6:00-7:00 p.m. and Hearing-7:00 p.m.
Location: City Hall Council Chambers, Atlanta, GA

Date: May 17, 2012
Time: Community Exchange- 6:00-7:00 p.m. and Hearing-7:00 p.m.
Location: College Park Public Safety Complex, College Park, GA

MARTA envisioned that LEP communities (i.e., Hispanic, Chinese, Korean, and Vietnamese) would require special outreach, in relation to community forums and public hearings. Therefore, MARTA provided and/or acquired translators and announcements in alternative formats to ensure that information was properly conveyed to respective LEP populations. In addition, MARTA advertised the hearings in Spanish, Chinese, Korean and Vietnamese (**Exhibit 10**).

Meaningful Access to LEP Persons

In keeping with the theme of expanded and non-conventional outreach efforts, DEO is involved in multiple collaborative activities that further the efforts of External Affairs and MARTA. These efforts include: maintaining outside agency memberships or sponsoring LEP organizations, developing specialized training for LEP individuals, conducting employee education, holding community forums/public hearings and attending LEP events.

In order to ensure the ongoing inclusion of LEP populations, MARTA developed a formal LEP Plan which is consistent with the guidelines prescribed under Executive Order 13166: "Improving Access to Service for Persons with Limited English Proficiency and the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" was published in the Federal Register, Volume 70, Number 239, December 14, 2005 (**Exhibit 11**).

¹ Effective Nov. 11, 2012, MARTA implemented a scheduled fare increase as part of its fiscal- year 2013 budget. The increase, which covered reduced and mobility fares, was part of a three-year, phased-in fare hike adopted during the FY 2010 budget cycle. Reduced fares increased from 95 cents to \$1, the mobility based fares increased from \$3.80 to \$4, and the mobility pass increased from \$122 to \$128.

The MARTA LEP Plan is updated every 5 years. MARTA is currently in the process of updating the LEP Plan from 2009 with a projected completion date of June 2014. As a part of this update, MARTA will use the 2010 Census data. MARTA will use the census website to identify the LEP population on a census tract-by-census tract basis, which will allow MARTA to determine if LEP persons are concentrated in specific neighborhoods within your service area.

The updated 2014 LEP Plan will include:

- An examination of prior experiences with LEP individuals

MARTA will first examine its prior experiences with LEP individuals and then determine the number and proportion of LEP persons served or encountered within our service area. MARTA will strive to assess this number and proportion through a mix of data sources, including the following: 1) data from the U.S. Census; 2) data from state and local government agencies; and 3) information from organizations that serve LEP persons.

This task involves reviewing the relevant benefits, services, and information in determining the extent to which LEP persons have come into contact with front line employees through one/ or more of the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to your agency's customer service telephone line;
- Visits to your agency's headquarters;
- Access to your agency's website;
- Attendance at community meetings or public hearings hosted by your agency; and
- Contact with MARTA's paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

MARTA will contact its customer service representatives, vehicle operators, station managers, and community outreach staff to obtain data in relation to LEP persons. During this contact, MARTA will find out if the staff person is able to identify the LEP persons' native language, how successful MARTA has been in communicating with LEP persons, and common questions directed to MARTA by LEP persons. MARTA will also review any available records on the number of hits we receive on our web, requests for interpreters at public meetings and results of ridership surveys that capture the experiences of LEP persons.

- The results of the Four Factor Analysis including a description of the LEP Populations served.
- A detailed analysis of Factor #3 (the nature/importance of the program, activity or service) included throughout the LEP Plan.

- A description of how MARTA provides language assistance services for various languages.
- A description of how MARTA provides notices to LEP persons about the availability of language assistance.
- A description of how MARTA monitors, evaluates and updates the language access plan.
- A description of how MARTA trains employees to provide timely and reasonable language assistance to LEP populations.

Language Assistance Services By Language

The top spoken languages listed in MARTA's 2009 LEP Plan, in the Atlanta metropolitan area, other than English, are 1) Spanish, 2) language dialects from India*, 3) Korean, 4) Chinese and 5) Vietnamese.² There are a variety of ways in which MARTA provides language assistance service to the above population. MARTA hired bi-lingual employees, created an employee language bank; provided translation services and interpreting services etc. MARTA utilizes the same methods and procedures to provide language assistance.

The Metropolitan Atlanta Rapid Transit Authority (MARTA) supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. MARTA currently offers a number of language assistance services, including, but not limited to:

Oral Translations

- Recruited and hired bilingual employees.
- LEP customers who call MARTA Call Center have direct access to bilingual customer service representatives and can be connected to a telephonic interpretation service with linguists who speak over 200 languages.
- MARTA has a Language Resource Bank comprised of bilingual and multilingual represented and non-represented employees. Employees are called upon to volunteer their time and act as interpreters for MARTA at special events, public meetings and public hearings. Additionally, employees assist with the translation of simple documents, record bilingual public announcements or assist in emergency situations where bilingual communication is required.
- MARTA has produced a "How to Ride MARTA" presentation in English and four other languages: Spanish, Vietnamese, Korean, Japanese and Russian. These are posted on the MARTA website and also distributed to community-based organizations (CBOs) that serve low income, minority and LEP populations upon request.

² *Languages/dialects in this country were not provided by the school systems due to the small proportion of students who speak the respective languages/dialects.

- Selected rail system-wide announcements are made in English and Spanish. The majority of bus announcements are made in English and Spanish.
- Some front line staff use visual translation cards and other tools to communicate with individuals with limited English proficiency.
- MARTA plans to use browse Aloud software to address difficulties people with literacy and visual impairments may encounter when attempting to read large amounts of small text on screen on MARTA's website. Browse Aloud makes using the Internet easier for people who have low literacy and reading skills, English as a second language, dyslexia and mild visual impairments.

Written Translations

- Materials critical for accessing and using MARTA's services and receiving transit benefits have been translated over the past three years. Various documents have been identified as "vital" and translated into the regularly encountered languages in the MARTA service area.
- MARTA Riders Guides are available in the following four languages: Spanish, Korean, Chinese and Vietnamese. The guides can be downloaded from the MARTA website.
- All bus timetables are produced in English/Spanish bilingual versions and are available on the MARTA website and at some bus stops.

MARTA has established language access for LEP populations through key departments, in terms of the nature and importance of services, programs or activities, which link to the general public. Each of these key departments has standard operating procedures in place to provide language assistance services for LEP persons who do not speak English as their primary language or who may have a limited ability to read, write or understand English. As central resources for these departments, and MARTA in general, MARTA has retrained a verbal language translation service which is easily accessed when no MARTA employee is readily available to provide translation services and a vendor to provide written translations.

The Language Line Services is a company that is contracted to provide MARTA with a consistent 24 hours a day 7 days a week rapid access to high quality interpreters for more than 170 languages including, but not limited to: Spanish, language dialects from India, Korean, Chinese, Vietnamese, language dialects from Africa including Swahili; Arabic, French, and German. Under a contract with the Georgia Department of Human Resources, Georgia agencies are allowed to utilize its contract with the Language Line to secure volume price advantages. Invoices are sent from Language Line Services to MARTA's Information Technology Department (IT) on a monthly basis.

Police Services

MARTA Police personnel must be able to communicate with people from LEP populations. Therefore, the department has a plan language access policy in place (General Order 81-102) to ensure communication with individuals who speak Spanish, language dialects from India, Korean, Chinese Vietnamese Spanish, Korean, Vietnamese, Chinese and language dialects from Africa. If an officer speaks only English, and the other person speaks only their native

language, the communication problem is obvious. This General Order describes how MARTA can use a translation service provided by the Language Line Services.

If a MARTA Police employee is confronted with a person who must be interviewed or questioned about a situation being handled by the Police Department, and that person does not speak English, and if there is no local interpreter readily available, a translation service is available through Language Line Services. This service can be accessed only through MARTA Police Communications. It is available 24 hours per day every day of the year.

The officer will call Communications and explain the language problem. The native language of the person involved should be identified, if possible. Communications will contact Language Line Services to arrange for the services of an interpreter. The interpreter will then assist the person conducting the questioning or interview by providing translation services. This assistance will be provided via the telephone.

Only Communications has the access codes to Language Line Services. Only Communications personnel will contact this service to arrange translation services. There is a substantial cost for the language service. It should be used only in the case of genuine need and only in support of a legitimate Police Department activity. If Language Line Service is used as part of a police investigation that use will be documented in the Police Incident Report.

Customer Call Centers

The Customer Care Center is comprised of MARTA's two (2) call centers to facilitate language access services in Spanish, Korean, Vietnamese, Chinese and African Languages, as needed:

- Customer Information Center – provides bus and rail schedule information and trip itinerary planning service.
- Customer Service Center- documents, tracks, investigates and reports on Authority-wide complaints, commendations & recommendations including fare media disputes.

In 2008-2009, working with DEO, the Customer Care Center piloted the use of a translation service to expand MARTA's ability to communicate with customers whose primary language is not English.

In 2010, a contract with a translation interpreting service was issued, procedures developed and staff trained to deploy this added convenience for MARTA's non-English speaking customers. The use of a translation service supplements the availability of Spanish-speaking staff already hired and working within the call centers.

The process is as follows:

- MARTA customer calls the main telephone number (404) 848-5000.
- Customer is given a prompt option to select # 1 for English or #2 for Spanish and other languages.

- Selecting option #2 directs customers to a menu tree that is recorded in Spanish.
- Spanish/other language calls are routed to a Spanish-speaking representative in the respective call center. This telephone call is channeled to the representative as a priority call, so that once the representative completes the current call, the very next call would be this call that requires assistance to communicate.
- The telephone screen display notifies the representative that the caller is in need of language support allowing the representative to greet the caller in Spanish.
- The call center representative converses with the caller and, if needed, utilizes the language interpretation service.
- To communicate in any other language other than Spanish, a conference call is made to the translation service, request made for the desired language interpreter, and the three-way conversation is conducted.
- The language interpretation service offers the availability to communicate in 200 plus languages including Spanish, Korean, Vietnamese, Chinese and multiple African languages.

Additionally, Customer Care Center staff support various offices MARTA-wide with the following:

- Public hearing, community meeting, special events, festivals.
- Greeting and speaking to customers who choose to come to the MARTA Headquarters building to speak to someone in management or to resolve an issue.
- Reviewing and editing flyers and marketing material for distribution.
- Translating and recording emergency messages placed on MARTA's main telephone line.
- Reviewing and editing scripted Spanish recordings for accuracy.

Communications and Marketing

MARTA's Marketing and Communications Department works in partnership with DEO to create language access for the community and MARTA patrons who speak Spanish, Korean, Vietnamese, Chinese and multiple African languages. As reflected in the Public Hearing Policy and Procedures and updated Community Outreach Procedures contained in Exhibit 8, flyers are used to announce public meetings and are placed on the MARTA website in multiple languages including: Spanish, Korean, Vietnamese and Chinese. Flyers are also distributed to various locations in the Asian Community. Critical information on the bus and rail schedules are in English and Spanish; information advising individuals on how to obtain information in additional languages is also written on MARTA schedules and publications. Further alternative language translation services for the MARTA website is available, through Google Translation, in multiple languages including: Spanish, Korean, Chinese, Japanese, French and German.

Diversity and Equal Opportunity Office

DEO employees are advised of the process to access the language assistance services during their orientation period with their immediate supervisor. Before referring the caller to another office, DEO employees should utilize available bilingual staff whenever possible, to assist with requests from MARTA's LEP population. If no available and appropriate bilingual staff member is present, the DEO call-taker shall inform the LEP caller that he or she will be placed "on hold" and immediately transfer the LEP caller to extension 404-848-2244 or 404-848-5290 so that the appropriate Customer Service Representative may assist the caller.

The continuous pursuit to provide meaningful access to LEP populations often requires collaboration. Therefore, comprehensive efforts in the areas of compliance, education and outreach are ongoing.

Education and Access

Title VI-related educational efforts are implemented on a regular basis. For example, each day MARTA provided two Transit System Orientation Sessions for MARTA mobility and reduced fare customers from LEP populations (9:00 a.m.-12:00 noon and 2:00 p.m.-4:00 p.m.). In addition, upon request the MARTA Office of Diversity and Equal Opportunity, Reduce-Fare Office and MARTA Mobility trained seniors (65 and older) and individuals with disabilities who spoke various languages (i.e., Korean, Russian, Spanish and English). Education was provided on the following topics:

- How to Ride MARTA
- Trip Planning
- Various Fare Media available
- Breeze Vending Machine
- Eligibility for the Half-Fare Program
- MARTA Mobility Eligibility
- Traveling the System Safely

Highlights of Outreach Events and Initiatives

As reflected in the External Affairs' community meeting logs (**Exhibit 12**), during the reporting period, MARTA was involved with a host of outreach events and initiatives in relation to minority and LEP populations including, but not limited to:

- Atlanta Beltline Environmental Justice Policy Development Forum
- Atlanta Beltline Quarterly Public Briefings
- East Atlanta Community Association Meetings
- Georgia People Agenda Meetings
- Northwest Community Alliance Meetings
- Dismas Charities Community Relations Council Meeting
- Fulton County Government Meetings
- The Open Doors Day Community Festival
- Focus Upon Senior Services Event
- DeKalb CEO Town Hall Meetings
- DeKalb Legislative Community Cabinet

- East Atlanta Earth Day Festival
- The Partnership for Southern Equity Meetings
- The Ashford Landing and Parkside Senior Center Community Meeting
- The Civic League of Metro Atlanta Meetings
- Georgia African-American Chamber of Commerce Legislative Meeting
- Word Refugee Day Outreach at the Clarkston Community Center
- Clarkston Community Center Night Out Outreach Event
- Georgia Hispanic Chamber of Commerce Meetings
- GHCC Regional Business Summit and Expo (Booth)
- National Association of Minority Contractors 2012 Hard Hat Awards
- DeKalb County Small Business Development Conference
- Abilities Expo Community Outreach
- Korean Radio, Duluth, GA (on-air information and educational interview)

Neighborhood Planning Unit (NPU) ³ Outreach Meeting updates on the Transportation Investment Act of 2010 were conducted for:

- NPU-B
- NPU-E
- NPU-G
- NPU-I
- NPU-J
- NPU-K
- NPU-M
- NPU-N
- NPU-R
- NPU-T
- NPU W
- NPU-X

In addition, MARTA provided multiple community-based updates on the Transportation Investment Act of 2012 to the following Atlanta, Georgia based groups:

- The Concerned Black Clergy
- Helen Mills Senior Center
- Senior Citizens (Wheat Street Towers Location)
- Briar Cliff Summit Senior Meeting
- Georgia Stand Up Meeting
- Council Member Keisha L. Bottoms Town Hall Meeting
- Able-Transportation Equity Task Force
- Georgia Stand-up

³ Neighborhood Planning Units (NPU's) are the foundation of Atlanta, Georgia's neighborhood planning system. The Mayor, City Council and various city agencies rely upon neighborhood organizations for comments and suggestions concerning the city's growth and development including transportation issues in relation to minority, low-income and LEP populations. Each NPU services a specific geographic area.

DEO also conducted cultural commemorations including:

- DEO National Hispanic Heritage Month: In celebration, DEO showcased posters identifying Asian/Pacific Americans and their contributions.
- DEO National Asian and Pacific American Heritage Month: In celebration of this month DEO showcased posters identifying Asian/Pacific Americans and their contributions.
- DEO Juneteenth Commemoration: Juneteenth is an unofficial holiday that commemorates the announcement of the abolition of U.S. slavery in the State of Texas in 1865. In celebration DEO showcased posters identifying African-Americans and their contributions.

Active community organization memberships include:

- Georgia Hispanic Chamber of Commerce
- NAACP-Atlanta Chapter

MARTA has also participated in events as a partner with paid booths and in-kind services with the following organizations:

- Asian American Resource Center
- Asian Indian Chamber of Commerce
- APAC-Asian/Pacific-American Council of Georgia, Inc.
- Atlanta Metropolitan Black Chamber of Commerce
- Georgia Black Chamber of Commerce
- Latin American Association (Recruitment outlet and Cultural Diversity)
- Mexican American Business Chamber

MARTA has established in-kind relationships with the following consulates:

- Consulate General of the Republic of Guatemala (Cultural Diversity)
- Consulate General of the Republic of Colombia (Cultural Diversity)
- Consulate General of Mexico (Cultural Diversity)

Minority Representation on Programming and Advisory Bodies

MARTA has a board of directors (the MARTA Board) which is not selected by MARTA. The Board is composed of 11 voting members and one nonvoting member who must all reside in Georgia. The racial breakdown of the MARTA Board is included as **Exhibit 13**. Of the voting members, three members must be residents of the City of Atlanta to be nominated by the mayor and elected by the city council. Four members must be residents of DeKalb County to be appointed by the DeKalb County Board of Commissioners. At least one appointee must be a resident of the portion of DeKalb County lying south of the southernmost corporate boundaries of the City of Decatur and at least one appointee shall be a resident of the portion of DeKalb County lying north of the southern-most corporate boundaries of the City of Decatur. Three members must be residents of Fulton County to be appointed by the local governing

body and one appointee must be a resident of the portion of Fulton County lying south of the corporate limits of the City of Atlanta. Two appointees must be residents of the portion of Fulton County lying north of the corporate limits of the City of Atlanta.

The commissioner of transportation is a voting member of the board and the executive director of the Georgia Regional Transportation Authority is a nonvoting member of the board. The governing body that appoints members also appoints successors to the office every four (4) years in the same manner that the governing body makes its other appointments to the board.

All appointments are four (4) years in tenure unless a vacancy causes otherwise. In this case, the appointment shall be filled by the local governing body that made the original appointment to the vacant position, or its successor in office. A member of the board may be appointed to succeed himself or herself for one four-year term. Appointments to fill expiring terms are made by the local governing body prior to the expiration of the term, but such appointments cannot be made more than 30 days prior to the expiration of the term.

The MARTA Board meets at least once a month to address the latest issues of importance concerning ridership, safety, economics, new technology, government regulations and more.

The Board of Directors also has five standing committees:

- Board of Directors Meeting
- Operations & Safety Committee
- Audit Committee
- Planning & External Relations Committee
- Business Management Committee

Sub-recipient Assistance and Monitoring

As outlined under Title 49 CFR, Section 21.9(b) and FTA Circular 4702.1B, Chapter III, Parts 11 and 12, MARTA provided assistance and monitored its sub-recipients. During the period of this Title VI Program submission, MARTA identified two sub-recipients which required monitoring: DeKalb County and Rockdale County.

DeKalb County adopted the Georgia Department of Transportation's (GDOT) Title VI Plan which, as MARTA verified, contained all of the FTA Title VI Program plan requirements **(Exhibit 14)**. Rockdale County chose to formally adopt the MARTA Title VI Program plan and submitted a letter to the Authority as verification **(Exhibit 15)**.

When MARTA conducted site visits with sub-recipients, verification was made that services were provided without regard to race, color, or national origin. Oversight included the documentation of two or more methods used by the sub-recipients to notify beneficiaries of protection under Title VI and ensured that notifications included the following required items:

1. A statement that the agency operated programs without regard to race, color, or national origin.

2. A description of the procedures that members of the public followed in order to request additional information on the sub-recipient's nondiscrimination obligations.
3. A written policy that described how the public could file a discrimination complaint and how the sub-recipients would distribute this to the public.

Sub-recipients of grants awarded by MARTA were required to have written procedures in place for investigating and tracking Title VI complaints. After a recent evaluation of FTA requirements, oversight for Title VI sub-recipient complaint tracking is being increased to include a quarterly reporting element. This change will allow MARTA to have a better method of tracking sub-recipient complaints. It will also allow the sub-recipient complaints to be tracked in the MARTA database. The information required on the quarterly report forms will include the following:

- Sub-recipient investigations, lawsuits, or complaints.
- Date investigation, lawsuit, or complaint was filed.
- A summary of the allegation(s).
- The status of the investigation, lawsuit, or complaint.
- Actions taken by the sub-recipient in response to the investigation, lawsuits (if any), or complaint.

Based on the MARTA screening process of sub-recipients, MARTA is not aware of any complaints against sub-recipients since the last Title VI Program plan was submitted in 2009. To ensure ongoing compliance, MARTA has heightened its efforts to increase sub-recipient tracking and monitoring and provided technical assistance by:

- Partnering with the MARTA Grants Office to ensure that MARTA grants have the required civil rights language;
- Formalizing the MARTA policies and procedures for monitoring sub-recipients **(Exhibit 16-A and 16-B)**;
- Developing an initial and quarterly check-list to ensure and monitor sub-recipient compliance with Title VI **(Exhibits 17-A and 17-B)**;
- Conducting site visits for the two (2) sub-recipients that MARTA was required to monitor **(Exhibit 18-A and 18-B)**;
- Requiring all sub-recipients to attend a 4-hour mandatory comprehensive compliance training on Title VI, Environmental Justice; EEO, ADA and DBE **(Exhibit 19)**.

Determination of Site Locations, New Starts, or Facilities

As reflected in the current Capital Investment Program (CIP), since the last Title VI Program was submitted on October 1, 2009, MARTA has not constructed any new storage facilities, maintenance facilities, vehicle storage facilities, operation centers or fixed guideway projects.

Environmental Justice

The Environmental Justice mandates found in FTA Circular 4702.1B, Chapter I, Part 6 and FTA Circular 4703.1, Chapter IV were followed by MARTA in relation to construction projects. Based on these principles MARTA works to:

- Avoid, minimize, or mitigate adverse effects on minority and low income populations.
- Ensure full and fair participation by all potentially affected protected communities.
- Prevent the denial of, reduction, or significant delay in the receipt of benefits by minority and low-income populations.

Therefore, MARTA integrated environmental justice analyses into its National Environmental Policy Act (NEPA) documentation for construction projects, which is required by NEPA. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), MARTA integrated the following into its documentation:

- A description of the low-income and minority populations within the study area affected by the project, and a discussion of the method used to identify these populations;
- A discussion of all adverse effects that would affect the identified minority and low-income populations;
- A discussion of all positive effects that would affect the identified minority and low-income populations;
- A description of all mitigation and environmental enhancement actions incorporated into the project to address any adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act. Adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project were also addressed as applicable;
- A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- For projects that traverse both minority and low-income and non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions, between minority and low-income and predominately non-minority and non-low income areas is completed.

During this Plan period, the MARTA Office of Transit System Planning (TSP) completed an Environmental Justice Analyses and/or utilized Environmental Justice Principals in the transportation planning process as reflected in the following major projects:

- ***The Atlanta BeltLine*** - On August 28, 2012 the Federal Transit Administration (FTA) approved the Record of Decision (ROD) signaling the completion of the first portion of

the required environmental analysis for the Atlanta Beltline (**Exhibit 20**). The Atlanta Beltline is a proposed modern streetcar and multi-use trails system situated within a corridor of approximately 22 miles that would encircle the core of the City of Atlanta and would be connected to MARTA and the larger regional transit network. The transit and trails elements are part of a comprehensive economic development effort combining green space, trails, transit, and new development along its historic rail segments.

The ROD summarizes the BeltLine Tier 1 Environmental Impact Statement (EIS) process, identifies the preferred transit and trails alternative, and advances the project through the federal project development process required to be completed in order to seek federal funding (**Exhibit 21**). Stakeholder and public input played a significant role in supporting MARTA and the City of Atlanta's decision-making and the FTA release of the ROD.

With the FTA issuance of the Tier 1 EIS ROD, the project can proceed to the Tier 2 Environmental Analysis as required by NEPA. The NEPA process is not complete until a more detailed analysis is completed during Tier 2 of the process. The major activities and decisions to be made in Tier 2 include detailed location and configuration of the transit and trail design elements, site specific impacts and mitigation.

- **The Clifton Corridor** - Between 2009 and 2012, MARTA and the Clifton Corridor Transportation Management Association (CCTMA) partnered to conduct the Clifton Corridor Transit Initiative-Alternatives Analysis (AA). The Clifton Corridor AA involved investigating the need for high-capacity transit connections between the MARTA Lindbergh Center/Armour Yard area in north-central Atlanta, and the Clifton Road employment centers and the City of Decatur in west-central DeKalb County. The Clifton Corridor includes some of the largest activity centers in metro Atlanta without convenient access to the existing interstate and system or MARTA rail system. These conditions have resulted in high levels of traffic congestion on a severely limited network of roadways. A Locally Preferred Alternative (LPA) was adopted by the MARTA Board of Directors in April 2012. The LPA encompassed 8.8 miles of new light rail service from the MARTA Lindbergh Center Station to Avondale MARTA Station and includes operations adjacent to the CSX right-of-way. The LPA also includes in-street operations within the medians of Clifton Road (through the CDC/Emory area), Scott Boulevard, North Decatur Road, DeKalb Industrial Way and North Arcadia Avenue (**Exhibit 22**).
- **I-20 East Corridor** - The I-20 East Transit Initiative was undertaken by MARTA to identify transit investments that would improve east-west mobility between downtown Atlanta and eastern DeKalb County. Specifically, investigating accessibility to jobs and housing within the corridor, the provision of convenient and efficient transit service to accommodate the increasing transit demands within the corridor, and the support of corridor economic development and revitalization. A Detailed Corridor Analysis (DCA) has been completed to help identify the best transit solution, also known as the Locally Preferred Alternative (LPA) for the corridor (**Exhibit 23**).

The LPA, as adopted by the MARTA Board of Directors in April 2012, is comprised of the extension of the MARTA Blue-Green heavy rail transit (HRT) line from the Indian Creek Station to the Mall at Stonecrest in eastern DeKalb County and a new bus rapid transit (BRT) service along I-20 between downtown Atlanta and Wesley Chapel Road, east of I-285 in DeKalb County. The adoption of the LPA by the MARTA Board of

Directors in April 2012 marked the completion of the two-year long DCA phase of the I-20 East Transit Initiative. The project now moves into the environmental review process, which is slated for completion early summer 2013.

- ***I-20 West Line Corridor*** - MARTA is undertaking a high-level reassessment and re-evaluation of transit improvements to the West Line Corridor that were proposed in 2004. At that time, the MARTA Board adopted a Locally Preferred Alternative (LPA) that recommended a heavy rail extension from the existing H.E. Holmes station to the interchange of Martin Luther King, Jr. Drive and I-285 and a Bus Rapid Transit (BRT) segment along I-20 West to Fulton Industrial Boulevard (**Exhibit 24**). Since 2004, there have been many changes to the study area demographics, land use and growth. In addition, there have also been some changes to Georgia DOT policies. Because of these changes, MARTA is reassessing the LPA to determine if these recommendations still meet the needs of the corridor.

This re-assessment will take place in two phases: Phase I includes initial outreach consisting of interviews with key stakeholders; and Phase II will consist of assessing existing conditions, identifying and evaluating project solutions to meet identified needs, and producing recommendations. The outcome of the West Line Reassessment is expected to be transit solution with strong public support from both neighborhoods and businesses. This solution(s) will be presented in early Spring 2013.

- ***The GA 400 Corridor Transit Initiative-Connect 400*** - The Connect 400–Alternatives Analysis (AA) was launched in late 2011 and involves an 18-month study to identify a potential high-capacity transit solution within a study area encompassing the GA 400 expressway between I-285 in the City of Sandy Springs and McGinnis Ferry Road in northern Fulton County. MARTA conducted an alternatives analysis within the study area in 2003 which resulted in a determination that the corridor was not supportive of high-capacity transit due to low household and employment densities, high household incomes, and low intensity land uses. Subsequently, the MARTA Board redirected planning activities to market analysis and policy planning to serve as a guide for future development in northern Fulton County.

Since these 2003 planning efforts were completed, the GA 400 Corridor has emerged as one of the fastest growing sub-regions within the Atlanta metropolitan area. As a result, roadway congestion and travel times along the GA 400 expressway and surrounding arterials have continued to deteriorate. The Connect 400 AA will include a re-assessment of the previous alternatives analysis within the context of the new growth and land use changes that have taken place over the last nine years. Ultimately, the study will result in the identification of a set of transit solutions or locally preferred alternative (LPA) that can be applied to help address the transportation challenges within the GA 400 study area. Once this selection has been made, an environmental impact statement (EIS) will be developed followed by engineering and design activities (**Exhibit 25**).

- ***Atlanta Street Car*** - The Atlanta Streetcar is the result of a cooperative effort by the City of Atlanta, the business community and MARTA to bring to fruition critical infrastructure that will connect the metro area and the greater region. The long-term vision for the proposed streetcar includes a north-to-south route from the Brookhaven MARTA station to Fort McPherson and an east-to-west route connecting the King

Center to the Centennial Olympic Park area west of Peachtree Street. Initial funding will kick start the first phase, focusing on the Downtown east-west route. As they become available, additional federal funding opportunities will be pursued to further fund the streetcar's expansion. Key features of the streetcar include:

- Potential for higher passenger loads.
 - Draw new transit riders.
 - Produces fewer emissions, impacting air quality and sustainability.
 - Reduces dependence on cars in a significant live-and-work corridor.
 - Appeals to visitors with its predictable fixed route.
 - Potential to increase ridership on connecting transit network.
- **Memorial Drive Arterial Bus Rapid Transit (BRT)/Q-Express Routes** - Traffic congestion on arterial roads has worsened as population and development has expanded throughout the metropolitan area. This congestion significantly impacts the efficient operation of local bus services. In an effort to improve bus service performance and overall quality along these congested arterial roadways, MARTA has identified several corridors that could benefit from the implementation of arterial bus rapid transit (BRT). Arterial BRT refers to bus operations on arterial roadways that incorporate advanced traffic signal and geometric treatments, resulting in bus travel time savings. Such treatments included operation of buses in exclusive lanes, provision of queue-jumper lanes that allowed buses to move to the front of traffic lines, implementation of signal priority systems that allowed buses to advance through intersections ahead of regular traffic, and aesthetically enhanced bus stations. The BRT/Q-Express project was completed in 2010 and is currently up and running.

MARTA previously worked with DeKalb County and the Georgia Department of Transportation to implement the first form of arterial BRT in the Atlanta region along a portion of the Memorial Drive corridor in DeKalb County. The Memorial Drive BRT features operations in the Atlanta, Georgia metropolitan service area:

- Express Service with stops at a few of the bus stations operating between the Kensington rail station and a proposed park-ride facility at the intersection of Memorial Drive and Goldsmith Road.
- Limited Service with regular stops at all bus stations on the route operating between Kensington rail station and a terminus at the intersection of Mountain Industrial Boulevard and East Ponce De Leon Avenue.
- The Memorial Drive BRT service employs queue-jumper lanes at the most congested intersections, as well as a signal priority system to reduce wait times at all intersections. The service features specially branded buses serving enhanced bus stations along the corridor. The operation features off-bus fare payment with MARTA Breeze Card, real time passenger information and an aesthetically pleasing station design.

In fulfillment of the National Environmental Policy Act (NEPA) requirements, the Federal Transit Administration previously issued a Finding of No Significant Impact (FONSI) for the project in December 2006. The FONSI determination was made following the completion of an Environmental Assessment document by MARTA.

In September 2010, MARTA began operating two express bus routes in the Memorial Drive corridor in DeKalb County. Both routes operate on weekdays only during the am and pm rush hours. Both routes operate at 10 minute frequencies. The routes, known as the "Q" Express Routes include Route 520 Limited and Route 521 Express. Route 520 Limited Express serves seven stops in each direction, including the terminal locations at Kensington Station and Mountain Industrial Blvd. Route 521 Express serves only four stops in each direction, including the terminal locations at Kensington Station and the Goldsmith/Memorial Drive Park and Ride Lot.

The express buses are equipped to transmit signals to traffic lights (signal prioritization) to give buses priority to travel through intersections. Special lanes constructed along Memorial Drive allow buses to bypass traffic queues (quejumpers). Daily ridership is about 1,000 and 600 passengers on the 520 and 521, respectively, or about 400,000 annual passengers on both routes.

- **Hamilton Clean Fuel Bus Facility** - This project will reconstruct and expand the existing Southside Operating and Maintenance Facility to support the full deployment of clean fuel buses. The reconstructed facility will have the ability to service both CNG and Clean Diesel buses. By enabling the expanded utilization of alternatively-fueled buses, this project will further national goals and objectives to improve air quality and reduce reliance on imported oil. As of November 2012, MARTA is currently soliciting bids from the market place to implement this project. The timeline for awarding the contract is 3 to 12 months.
- **Pollution Prevention Plan** - The ongoing Pollution Prevention Plan develops and implements a Storm Water Pollution Prevention Plan (SWPPP) and Spill Prevention plans (SPCC) for all bus and rail maintenance facilities. Programs and Plans require updating every five years or when significant operations change. In FY 2013, plan updates will be required for all seven facilities. These updates will be required to undergo implementation in FY 2014. With major changes and improvements in two bus facilities (Brady and Hamilton) additional funds will be required in future budget years. All bus and rail maintenance facilities are subject to the storm water permit and industrial wastewater permit requirements of the Clean Water Act, GA EPD, and local government requirements and annual updates to the plans will be required as the regulations are amended and changed. The programs are developed to ensure that maintenance is complying with the regulatory requirements.

The pollution prevention programs are required to undergo regulatory updates annually, specifically as they relate to facility upgrades with respect to train and bus wash improvements, addition of new bulk fluids and materials, and changes in chemical storage regulations.

Although, the SWPPP/SPCC plans are updated within five year cycles, plan updates are required when there are changes in regulations, environmental permits are renewed, or facility upgrades occur. The Georgia General NPDES permit for all facilities were subject to renewal in calendar year 2011, this will require SWPPP/SPCC plans to be updated in 2012 to conform to the newly issued permit requirements. In addition, several MARTA facilities have undergone or will be undergoing facility enhancements in the upcoming fiscal years. These enhancements will require changes to the existing SWPPP/SPCC plans to meet the current

regulations. Examples include the Hamilton Bus Expansion, Laredo Bus Canopy, Brady, Laredo, and Hamilton DPE installations.

Four of the seven operating MARTA maintenance facilities (Armour, Brady, Perry, Hamilton/Browns Mill) have City of Atlanta issued industrial wastewater discharge permits, which require annual renewal. All discharge permits are conditioned to specific regulatory requirements, which are subject to change once renewed. Any change in the permits must be captured in each facility's compliance plans, and must be updated to meet the permit requirements. The Pollution Prevention Program is a continuous program, which allows MARTA to assess pending and upcoming regulatory changes in an effort to develop programs to meet regulatory compliance.

The Office of Diversity and Equal Opportunity (DEO) works closely with Transit System Planning in reviewing and commenting on environmental justice assessments for construction projects and programs. The ongoing interface between DEO and the Planning Department ensures continuity in the application of Title VI/Environmental Justice requirements during the conceptual, planning, and implementation phases of projects and programs.

III. *FIXED ROUTE TRANSIT PROVIDERS*

System-wide Service Standards

The 2012 MARTA Service Standards support the ongoing mission to provide a safe, clean, reliable, and cost effective public transportation system that contributes to the sustainable growth, development, and improved the quality of life in the Atlanta Metropolitan region. In order to ensure compliance with Title VI regulations and mandates, MARTA monitors the performance of the MARTA transit system and annually presents new Service Standards to the GM/CEO and the MARTA Board of Directors for review and approval (**Exhibit 26**). The most recent Service Standards (FY 2012) were based on FTA Circular 4702.1A, which was the current circular at the time that the Service Standards were approved by the MARTA Board. These Service Standards are made available upon request from the Office of Transit Systems Planning. As permissible under FTA Circular 4702.1B, Chapter IV, Part 2(c), MARTA conducted all service equity analyses, prior to April 1, 2013, under the guidance found in FTA Circular 4702.1A. MARTA will apply the standards found in 4702.1B for all future analysis conducted after April 1, 2013.

Under the monitoring process outlined in the FY 2012 Service Standards, MARTA used the minority transit route definition outlined in FTA Circular 4702.1A to implement the monitoring program. During the process, MARTA selects a sample of minority and non-minority routes from all modes of service. The sample includes routes that provide service to predominantly minority and non-minority areas.

MARTA assesses and compares the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies. In cases in which MARTA observes that service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, MARTA analyzes why the discrepancies exist, and takes the appropriate steps to reduce the potential effects on minority or low income communities. MARTA also evaluates transit amenities to ensure amenities are being distributed throughout the transit system in an equitable manner.

In order to consistently monitor transit services, MARTA developed a policy and procedure to determine whether disparate impacts exist on the basis of race, color, national origin or income-status and applies the policy and procedures to the results of the monitoring activities. Upon completion of the monitoring process the Planning Department briefs and obtains approval from the MARTA Board of Directors. The MARTA annual monitoring program is well documented and includes the program results and Board approval. No disparate impacts on the basis of race, color or national origin were found during the current monitoring review.

Utilizing a fleet of 531 buses, 338 rail cars and 187 Para-transit vans, with 442 fixed route vehicles in peak service, MARTA operates a rapid transit system within Fulton County, DeKalb County and the City of Atlanta. There are many ways that MARTA fulfills its service standard requirements. These include evaluating the following quantitative standards:

- Vehicle load
- On-Time performance
- Distribution of transit amenities
- Service availability

The Department of Bus Operations and Rail Operations are both central to the operation of the MARTA transit system.

The Department of Bus Operations:

- Is responsible for the overall management and coordination of the MARTA bus transportation and maintenance functions.
- Oversees the daily transport of passengers on the fixed route bus system.
- Contains the Bus Maintenance Unit, which is responsible for the maintenance of all non-revenue vehicles, buses and Para-transit revenue vehicles.

Bus Load Factors - Bus Load Factor is defined as the ratio of passengers on board a bus to the number of seats available:

- The standard load factor for bus service is 125% of seated capacity, not to exceed 150%. The standard load factor for any service operating 10 or more miles per trip on limited-access highways is 100% of seated capacity.

Therefore:

- A 40-foot, 40 seat bus with 50 riders is standard; 60 or more riders exceed the maximum load factor.
- A 35-foot, 33 seat bus with 42 riders is standard; 50 or more riders exceed the maximum load factor.
- A 30-foot, 25 seat bus with 32 riders is standard; 38 or more riders exceed the maximum load factor.

If a route exceeds this standard, it is further monitored. If the overload is documented for three consecutive days during the mark-up period above a 150% load factor (100% for any service operating 10 or more miles on limited-access highway), corrective actions are taken to achieve balance loading within acceptable limits of these standards. Corrective action includes increased frequency, supplemental “plug” service and/or increased vehicle size. Plug service is defined as anticipated extra service implemented to avoid overcrowding and inconveniencing the riding public during scheduled special events.

Bus Headways - Bus Headway is defined as the interval of time between buses traveling in any given direction on a route. Weekday morning and evening peak periods maintain headways of 45 minutes or less. Weekday off-peak and weekend service maintain headways of no more than 75 minutes. Headways vary between peak periods and off-peak periods where the demands dictate.

Bus Headway by Period

- Weekday morning/afternoon peak period 45 minutes or less.
- Weekday off-peak /Weekends up to 75 minutes.
- A peak period exception of 60 minutes applies to weekday routes that maintain the same headways during all service periods, peak or off-peak.
- No bus route have headways that exceed 75 minutes unless otherwise approved by the MARTA Board.

The following factors are examined when establishing and adjusting headways:

- Load factor
- Equipment allocation
- Passenger demand
- Route length
- Running time
- Passenger volume

When schedules are developed, pulse headways of 15, 30, 45, and 60-minute intervals (on some lines) are preferred. However, running times are allowed to be adjusted for known traffic conditions, wherever economically practical and feasible, within fiscal and contractual constraints. Consistent trip departure times and pulse headways help to facilitate timed-transfers and better passenger connections with other bus routes and trains.

Bus On-time Performance - On-Time Performance (OTP) is defined as buses departing at published time points no more than five minutes late and zero minutes early. The on-time performance of service is affected by many variables, including traffic congestion, accidents, weather, road conditions, infrastructure maintenance work, vehicle failures, etc. The Schedule Adherence Standards provide ways of measuring how reliably services adhere to the published schedules. If a service does not pass the Schedule Adherence Standards, MARTA would determine the reason why it did not consistently meet standards and would take action to correct the problems. Corrections include adjusting running times, changing headways, etc.

Bus Schedule Adherence Standards - Schedule Adherence Standards provide the tools for evaluating the on-time performance of individual MARTA routes. Passengers using high-frequency services are generally more interested in regular, even headways than in strict adherence to published timetables. Whereas, passengers on less frequent services expect arrivals/departures to occur as published. Customers generally timed their arrival at bus stops to correspond with the specific scheduled departure times. Bus scheduling staff analyzes reports that present average travel times between time points utilizing Automatic Vehicle Location (AVL) data that evaluate schedule reliability. During the development of passenger timetables, these reports are used to correct any run time deficiencies that are found in the new schedule. The Schedule Adherence Standards for bus routes are designed to ensure that routes operate as reliably as possible without early departures, chronic delays, or unpredictable wait and/or travel times.

Bus Route Test - The Bus Schedule Adherence Standard determines whether or not a route is on time. This is based on the proportion of time points on the routes that are on time over the entire service day. Eighty-percent of all departure times on the route over the entire service day are required to pass their on-time tests to be in compliance.

Exception:

- A schedule may note that certain trips would not leave until another vehicle arrives and allows passengers to transfer. (For instance, the last bus trip of the day might wait for passengers from the last train of the day.) When applying this standard, these trips are not included.

Bus On-Time Performance Measurements and Calculations - Bus on-time performance is measured against all defined time points, excluding starting and ending points on a given route over the service period measured. Bus on-time performance is calculated by dividing the number of departures between 0 and 5 minutes after scheduled departure time at the defined time points by the overall number of departures as captured by the AVL system, and multiplying the result by 100. Thirty seconds are added to both ends of the 0 to 5 minute interval to capture the deviation of various time-tracking equipment.

On-time performance is monitored on a route-by-route basis. If the on-time performance for a route fell below the target rate of 80%, it would be flagged and subjected to review by the Service Improvement Team (SIT). See the diagram below.

- Target and performance range: $\geq 80\%$; on target
76% - 79.99%; need improvement
< 76%; fail

Upon identification of causes for substandard on-time performance, actions are developed and implemented as resources permit. These actions generally include adjustments to headways and/or running times. The SIT is an inter-departmental group consisting of staff representing Planning, Operations, Customer Service and Safety. The group met to address on-time performance issues and improve service reliability.

Route Productivity - Route Productivity is based on current ridership information and performance measures. Ridership information that is reported on a tri-annual basis was used to calculate productivity by route for weekday, Saturday and Sunday service. Route productivity standards dictate the minimum productivity that a route should maintain. The standards for evaluating portions of routes are intended for use in identifying service improvement needs, for making modifications to specific portions of existing routes, or for identifying low productivity segments of routes. These standards are used in situations such as isolating low productivity portions of otherwise productive routes or measuring options for bringing unproductive routes into compliance with the overall service standards. These standards are used to evaluate proposals for new route extensions or deviations on existing routes. The productivity measures established for bus service are as follows:

- Average Passengers per Revenue Mile;
- Average Cost Per Passenger;
- Average Passengers per Revenue Hour;
- Farebox Recovery (Passenger Revenue Percentage to Operating Cost).

The performance measures are calculated for the entire system and then organized by type of service. The measures of performance are calculated separately for Local, Feeder, Peak Hour Only and Semi-Express services. If a route is categorized as a “local” route it is compared against the average of the other ‘local’ routes. An excerpt of the productivity calculation matrix is reflected in **Exhibit 27**.

Bus Stop Spacing - Bus Stop Spacing guidelines are based on land use characteristics and population densities. Efficient bus stop placement balances the need to minimize travel time for transit vehicles with the need to minimize distances traveled to reach bus stops. The following areas are evaluated in determining bus stop locations: safety, convenience, ridership, local land use, accessibility for people with mobility impairments who use wheelchairs or other mobility aid devices and other special considerations.

Special consideration for the placement of bus stops will be given to lifeline facilities and the respective trips generated or attracted (such as apartment complexes, shopping centers, and major tourist attractions). MARTA staff review proposed site locations to ensure that bus stops offer the maximum possible safety and convenience for boarding and alighting customers. The spacing of bus stops is considered when evaluating schedule adherence. Stop spacing may need to be adjusted to ensure the closest possible adherence to the guidelines outlined in the paragraph below.

Local, Feeder, Peak Hour Only and Semi-Express Service Bus Stop Guidelines - The following guidelines are established as optimum distances between bus stops, although it is recognized that safety, passenger demand, operational conditions, and land uses unique to each bus stop may change the spacing during actual application. The “Area Type” designated below is based on population and employment densities from the 2010 Census data and American Community Survey⁴. Based on these sources, data is calculated for each Traffic

⁴ The American Community Survey (ACS) is an ongoing U.S. Census Bureau survey that provides annual data and gives communities the current information they need to plan investments and services.

Analysis Zone (TAZ). Exceptions exist on semi-express routes that travel on freeways, expressways, or other limited-access roads:

<u>Area Type</u>	<u>Avg. Distance (ft)</u>	<u>Stops/Mile</u>
Low Density	2640 to 1000	2 to 5
Medium Density	1,000 to 750	5 to 7
High Density	750 to 500	7 to 10

Vehicle Assignment/Distribution for Buses - Vehicle Distribution is required to be equitable throughout the system at the divisional level between garages and during daily vehicle assignment. Factors that are considered in relation to vehicle distribution included: fuel type, availability by division, peak vehicle requirement by division and maintenance capabilities by division.

Vehicles are equitably distributed throughout the service area. This includes vehicle assignments to each garage and the services provided from each garage. The MARTA Bus Fleet Management Plan details the average fleet age distributed across the divisions.

In addition, specific equipment is assigned to a given route based on load factor and capacity requirements, as well as when the assignment of the equipment fulfills a special need on assigned routes. See **Exhibit 28** for bus vehicle assignment by garage, fuel type, size and age of the fleet.

The Department of Rail Operations:

- Provides safe and efficient operation of all rail car movement on the MARTA rail system.
- Manages the Rail Services Control Center.
- Maintains the rail fleet in a safe and reliable operating condition.
- Provides rail cars in sufficient quantities to meet the daily service milestones established by MARTA.
- Ensures a safe, reliable and sanitary infrastructure and operating system for internal and external customers.
- Provides maintenance and management support for various systems critical to operations.
- Oversees the safe and efficient operation of all rail car movement on the MARTA rail system.

Rail Load Factor - Rail Load Factor is defined as the ratio of passengers on the train to the number of seats available. The maximum load factor during all hours of service is 150% of the seated capacity. The seated capacity for a single rail car is 64. Applying the load factor to a six-car consist, the maximum allowable load would be 576 passengers, with 384 seated.

According to the standards, MARTA Rail load factors should not exceed 150% during all hours, except between Peachtree Center and Five Points Station in Atlanta where it would not exceed 170%. Train capacities for seated and acceptable loads are as follows:

- 2-car consist (Green Line): 128 seated; 192 maximum acceptable load
- 4-car consist: 256 seated; 384 maximum acceptable load:
 - 6-car consist: 384 seated; 576 maximum acceptable load
 - 8-car consist: 512 seated; 768 maximum acceptable load

Between Five Points and Peachtree Center, the maximum acceptable load for 6 and 8-rail cars is 653 and 870, respectively or 170% of seated capacity.

Load Factors for rail are determined through the use of manual point checks at eight key locations on the rail system:

- Bankhead
- Buckhead
- Dome/GWCC/Phillips Arena/CNN Center
- Garnett
- Georgia State
- Lenox
- Lindbergh Center
- Peachtree Center

These counts are performed at least annually, and more frequently based on necessity, to measure maximum rail car volume for weekday, Saturday and Sunday service.

Upon confirmation through investigation, if the load factor consistently exceeds 150%, corrective action is considered to achieve balanced loading within acceptable limits of these standards. Corrective actions may include an increase in train consist size or an increase in service frequency. A determination that the maximum load factor is consistently being exceeded is concluded through random checks of ridership over a period of sixty days excluding events, such as conventions and other special proceedings.

Rail Headway - Rail Headway is defined as the interval of the time between trains traveling in any given direction of travel. Weekday peak hour rail headway is 15 minutes on the Blue and Green Lines, and 15 minutes on the Gold and Red Lines, while weekday off-peak headway is between 15 and 20 minutes on all lines. Weekend and holiday headways are every 20 minutes on the Blue and Green Lines and every 20 minutes on the Gold and Red lines.

As outlined below, headways vary between peak periods and off-peak periods in order to minimize operating expenses and provide the most efficient service during weekday peak demand periods.

- Weekday early morning: 20 Minutes (10 Minutes on Trunks).
- Weekday morning/afternoon peak: 15 Minutes (7.5 Minutes on Trunks).
- Weekday midday: 15 Minutes (7.5 Minutes on Trunks).
- Weekday evening: 20 Minutes (10 Minutes on Trunks).

- Weekday late night: 20 Minutes all service.
- Weekends: 20 Minutes (10 Minutes on Trunks).

Trunks are defined as the segments of service that overlap between two or more rail services (i.e. Red-Gold/North to South) service between Lindbergh Center Station and Airport Station and Blue-Green (East to West) service between Ashby Station and Edgewood-Candler Park Station), resulting in improved headway benefit. The following factors are considered when adjusting rail headways:

- Load factor is assessed at least annually.
- The number of rail cars available is assessed monthly based on the frequency reported to the MARTA Board.
- Passenger demand is assessed bi-annually and sometimes monthly based on the frequency reported to the MARTA Board.
- On-time performance is assessed monthly.

Rail Span of Service Hours - Span of Service is defined as the hours that service will operate at any given time within the system. Rail service maintains for a span of up to 21 hours, seven days per week giving considerations to service demand and maintenance requirements. There is a three-hour interruption of service in the early morning hours to perform routine track maintenance.

Peak

- Morning Peak6:00 a.m.–9:00 a.m.
- Afternoon Peak3:00 p.m.–7:00 p.m.

Off-Peak

- Early Morning before 6:00 a.m.
- Midday9:00 a.m.–3:00 p.m.
- EveningAfter 7:00 p.m.

Weekend service is considered off-peak all day long with consistent frequency operating throughout the service day.

Rail Transit Access - Transit Access is defined as a measure of the distance a person must travel to gain access to transit service. The distance is measured by the actual path of travel rather than straight-line distance to better represent a person's ability to access the system. As a standard, this measure indicates the distribution of routes within a transit service area. It is measured by distance along the street network, as opposed to directional distance that does not consider physical barriers to travel. Rail service is considered accessible within a 1-mile pedestrian or wheelchair travel distance of any given rail station during all hours of service. The distribution of Transit Amenities refers to items of comfort and convenience available to the general riding public (escalators at rail stations, park-and-ride facilities, etc.).

Vehicle Assignment for Rail - MARTA Rail distribution is equitable for all transit customers and is not based on race, color, national origin or income status. The projection of rail car

requirements is based on forecasts of ridership expected to occur in the peak direction at the maximum load point on the trunk of the Red-Gold and Blue-Green Lines. These ridership estimates are converted into the required number of rail cars to carry that volume at the load standard set by the MARTA Board of Directors, taking into account the round trip cycle times on each of the rail lines.

The daily availability of rail cars is closely monitored to ensure that a sufficient number of cars are ready for daily revenue service. Under the guidance of a supervisor, at each of the rail yards dedicated mechanics are responsible for daily pre-service inspections. Before revenue service, the pre-service inspection team inspects all revenue cars in the yards to ensure that key equipment is operating properly. Repairs are made at the time of the inspection or scheduled for a later time if the discrepancy can be deferred without impact on safety or operations. The objective of the daily inspection is to check for interior and exterior defects that might lead to an in-service failure.

Rail cars are periodically removed from service to accommodate scheduled inspections and various maintenance activities. Upon completion of the required tasks cars are deemed available for service use on either of the rail lines however typically they are utilized on the rail line that correlates with the maintenance facility performing the work. The Rail Fleet Management Plan is attached as **Exhibit 29**.

Transit Monitoring

For both bus and rail modes, annual reviews, including MARTA Board approval of the Service Standards and Board approval of major service changes/modifications (**Exhibit 30**), allow MARTA to assess the efficiency and cost effectiveness of services which are provided to the public. In addition, adherence to these standards ensures the highest quality of MARTA services and transit system access to every individual regardless of their race, color or national origin by:

- Identifying quantifiable Service Standards that are used to measure whether or not the MARTA transit services achieves service delivery objectives and to evaluate whether the MARTA transit services are provided in an equitable manner;
- Outlining a Service Planning Process that applies the Service Standards in an objective, uniform, and accountable manner;
- Involving the public in the Service Planning Process in a consistent, fair and thorough manner.

The communities within the MARTA Service area are diverse and constantly changing. Guidelines which reflect these changes are established and outlined in the Service Standards which allow for the consistent and continual evaluation of services.

In addition to the Service Standards, MARTA's Office of transit System Planning also monitors bus transit through the creation of Bus Route Service Profiles which are updated and published three times each year; the last update was published on September 12, 2012. The Bus Route Profile document includes route information and performance scorecard pages for each bus route along with detailed route maps and written synthesis of reported issues and the

actions taken by MARTA for each bus route cover a respective four-month period. The route information pages list the details that are exclusive to each route including: schedule information, which catalogs features of the route with respect to alignment; schedule information, which catalogs the hours of operation and headway of the route by the day of the week; and lifeline information, which catalogs the lifeline facilities (i.e., critical facilities to which MARTA has deemed necessary to protect access as a public service to patrons, especially those originating from low-income and transit-dependent areas. The Bus Route Profile document provides increase transparency and accountability by presenting clear, concise and user-friendly information about bus route operations and performance. This document is available upon request.

Service Equity Analysis

Circular 4702.1B specifies that data sources should be carefully selected depending on the type of service change being analyzed. Ridership demographics at the route level (collected by MARTA) will be required for some changes, while census demographics will suffice for others.

Demographics from ridership data are suited for the following changes:

- Deletion of more than 1 and ½ directional route miles on a given route.
- Discontinuation of any bus service not under the demonstration project status.
- A major route/rail modification which causes a 25% or greater reduction in the number of daily trips provided.
- Discontinuation of rail services to any rail station currently served.
- Discontinuation of any bus/rail services on any service days.

Demographics from census data are suited for the following changes:

- Establishment of a new bus route.
- Addition of more than 1 and ½ directional route miles on a given route.
- The extension of any MARTA rail line.

Fare Equity Analysis

Procedures for Title VI Fare Change Impact Assessment

The FTA Circular C 4702.1B, Chapter IV-19 requires that a fare equity analysis is completed using a four step process:

- Determine the number and percent of users of each fare medium being changed.
- Review fares before the change and after the change.
- Compare the differences for each particular fare medium between minority users and overall users.
- Compare the differences for each particular fare medium between low-income users and overall users.

The information below describes the type of data used to complete the analysis and the steps used to meet the requirements set above.

The Role of Quality of Service Survey Data

The most recently completed fiscal year's Quality of Service Survey database is used as the source for information on the demographic attributes of MARTA's riders. The survey consists of face-to-face interviews with randomly selected patrons on randomly selected vehicle trips (Bus or Rail car), or with randomly selected certified Paratransit users. This survey is conducted with several thousand respondents every year. The demographic information collected, which is used as a basis for this analysis, includes the respondent's race and/or ethnicity, household income (in \$10,000 increments), and fare payment method.

Steps For Conducting the Title VI Impact Analysis

1. *Determine the number and percent of users of each fare medium being changed.*

This step is performed by cross-tabulating the Quality of Service Survey fare payment method responses by the race, ethnicity, and household income responses.

2. *Review fares before the change and after the change.*

This step is performed by calculating the percentage change between the "before" fare and "after" fare for each major fare payment category.

3. *Compare the differences for each particular fare medium between minority users and overall users.*

Each minority group of survey respondents (African-American, Asian-American, Hispanic, etc.) is treated separately vis-à-vis those survey respondents who are not from among that group. For example, the proportion of Hispanic riders using the Seven-Day Pass is compared to the proportion of non-Hispanic riders (of whatever race/ethnicity) using that same fare payment method. A statistical test using these proportions and the associated sample sizes is performed to judge whether the difference between the two proportions is significant.

4. *Compare the differences for each particular fare medium between low-income users and overall users.*

The survey respondents are divided into one group with household incomes meet the Health and Human Services guidelines for poverty level, and another group with household incomes equal to or greater than that amount. These are characterized as low-income and high-income groups, respectively. The proportion of low-income riders using (for example) the Seven-Day Pass is compared to the proportion of high-income riders using that same fare payment method. A statistical test using these proportions and the associated sample sizes is performed to judge whether the difference between the two proportions is significant.

The appropriate tables are included in the analysis for submittal in the final document which includes any planned actions for mitigating any impact which may occur due to the proposed fare increase.

Collecting and Reporting Demographic Data

Demographic and Service Profile Maps

During the tri-annual Title VI Program reporting period, MARTA collected demographic data, including Demographic and Service Profile Maps and Charts, in order to determine the extent to which members of minority groups are beneficiaries of MARTA programs. Prior to any proposed service reductions or eliminations, the MARTA prepared demographic and service profile maps **(Exhibit 31)**.

As required under Circular 4702.1B, after the 2010 Decennial Census, MARTA updated its demographic and service profile maps using Geographic Information System (GIS) technology, as follows:

1. A base map of the MARTA service area that overlays Census block groups, including transit routes, fixed guideway alignments, transit stops and stations, depots, maintenance and garage facilities, administrative buildings, and major activity centers streets and highways. This map portrays the two-county MARTA service area, fixed guideways (the MARTA rail system), transit stations (rail stations and park/ride lots), bus routes, operations and maintenance facilities, and administrative facilities. Major roads, expressways, and ridership generators (high schools/colleges and hospitals) are also shown **(Exhibit 32)**.
2. A map highlighting facilities that were recently replaced, improved or are scheduled (projects identified in planning documents) for an update in the next five years was also created. This map shows all of the layers from the Minority Populations and Fixed Transit Facilities Map, with color-coded highlights to indicate recent and upcoming facility improvements. The information on this map is used to monitor transit facility improvements and ensure equitable improvements between minority and non-minority areas **(Exhibit 33)**.
3. A demographic map that plots the information listed in (1) above and also shades those Census block groups where the percentage of the total minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole. This map shows the basic transit system elements from the base map with an overlay of minority census block groups that exceed the service area average. The data shown on this map is used to monitor equitable provision of transit services, particularly bus routes **(Exhibit 34)**.
4. Map overlaying minority populations with fixed transit facilities, such as bus shelters, transit stations, and fixed guideways. This map shows all layers from the base map, plus a layer of bus shelter locations, with an overlay of minority census block groups that exceed the service area average. The information on this map is used to monitor the equitable distribution of bus shelters and other passenger amenities **(Exhibit 35)**.

5. A map depicting block groups where the percentage of the total low-income population residing in these areas exceeds the average percentage of low-income populations for the service area as a whole. This map shows the basic transit system elements from the base map with an overlay of low-income census block groups that exceed the service area average. Per Circular 4702.1B, the data on this map is used to identify low-income areas for environmental justice considerations **(Exhibit 36)**.

Demographics and Travel Patterns

The Office of Research and Analysis (Research and Analysis), provides various data and analysis for the Title VI assessments produced by MARTA. The specific tasks carried out included: the collection of customer feedback, system usage and demographics, including fare payment methods. R&A is responsible for the collection and analysis of modal ridership, as well as completion of the Title VI fare increase impact analysis required with any fare increase. In relation to the MARTA Title VI Program, the Office oversaw:

- The collection of information on MARTA riders' opinion of the quality of service they receive.
- The collection of information on MARTA riders' demographics and travel patterns.
- The identification of bus routes and rail stations that have high percentage of minority and/or general rider usage.
- The collection of information regarding the percentage of MARTA riders that have language barrier constraints.
- Analyses of the impact of changes in fares and parking fees.

As part of their data collection process, Research and Analysis conducts an annual Quality of Service survey. The survey tracks changes in customers' perceptions of service as well as the impact of improvement programs on an annual basis. It also provides data and analysis utilized in designing initiatives and priority setting for future service improvement programs. The FY12 Quality of Service Survey database was used to compile information on demographic attributes of MARTA's riders for Title VI Assessment. The report presents a total of 5,728 face-to-face General Rider interviews that Research and Analysis) interviewers conducted on board MARTA's rail and fixed route bus systems.

Quality of Service demographic information on respondents includes:

- Age
- Race
- Ethnicity
- Household income
- How many people in household
- How many children in household

- Education
- Fare payment method

In order to comply with the reporting requirements in 45 CFR Section 21.9 (B), below are the detailed findings of the latest demographic data collected. This analysis helps the MARTA to demine the extent to which members of minority groups are beneficiaries of programs and services.

Race

Race	Percent -FY12
Black	73.9%
White	15.9%
Amer. Indian / Alaska Native	0.3%
Asian Indian	1.7%
Chinese	0.4%
Filipino	0.2%
Japanese	0.1%
Korean	0.2%
Vietnamese	0.1%
Other	7.1%
Total	100%

In addition, respondents taking the Quality of Service Survey were asked whether they were Hispanic or Latino in a question separate from race.

Ethnicity	Percent - FY12
Not Spanish Hispanic Latino	91.5%
Spanish Hispanic Latino	8.5%
Total	100%

English Language Proficiency

Transit Research utilizes the I-Speak card so that respondents who cannot speak English can point to the interviewer which is their native language. On July 1, 2011 House Bill 87, a new immigration law that legislators promised would stem the rising tide of illegal immigrants in

Georgia, went into effect, since then riders with limited English proficiency stopped acknowledging the fact that they were LEP and refused to identify the language they speak. Research noticed the changed in behavior and the difficulty of collecting this important information. In order to address this issue, beginning in FY2014, Research and Analysis will add two new categories: Non-verbal refusal, and Refusal to select language.

Annual Household Income

Income Range	Percent
Under \$10,000	21.6%
\$10,000-19,999	19.6%
\$20,000-29,999	19.9%
\$30,000-39,999	13.0%
\$40,000-49,999	6.6%
\$50,000-74,999	8.8%
\$75,000 and Over	10.5%
Total	100%

Language Spoken at Home

Under the requirements of FTA Circular 4702.1A, MARTA’s Research and Analysis Department (Research and Analysis), did not collect data with respect to which language the respondent speaks at home. Therefore, in order to comply with FTA Circular 4702.1B, Research and Analysis will add a question to the FY14 survey to ascertain which languages other than English are spoken in the respondent’s home.

In addition Research and Analysis will review other sources, such as current Census data, to supplement languages spoken at home by our riders.

Travel Patterns of Riders/Usual Mode of Travel

Mode	Percent
Rail Only	23.5%
Bus Only	2.4%
Bus & Rail	74.1%
Total	100%

Comparative Analysis

Based upon the requirements as outlined in FTA Circular 4702.1B, Chapter 4, Section 5b, the following is a demographic profile that compares minority and non-minority riders on the variables household income, trip patterns, trips taken and fare payment method. This information is used to support the fare equity analysis that will be discussed in detail in a separate section.

For these tables, Minorities are defined as outlined under FTA Circular 4702.1B, Chapter 1, Section 5q, which include the following:

- 1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- 2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- 3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- 4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- 5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Comparison of Income – Minorities vs. Non-Minorities

Income Range	Minorities	Non-Minorities
Under \$10,000	23.5%	11.8%
\$10,000-19,999	21.4%	11.4%
\$20,000-29,999	21.2%	12.8%
\$30,000-39,999	13.5%	11.2%
\$40,000-49,999	6.4%	6.9%
\$50,000-74,999	7.7%	14.2%
\$75,000 and Over	6.3%	31.7%
Median	\$20,000-	\$40,000-

	24,999	49,999
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Comparison of Mode Usage – Minorities vs. Non-Minorities

Mode	Minorities	Non-Minorities
Rail Only	16.7%	59.0%
Bus Only	2.7%	1.7%
Bus & Rail	80.6%	39.3%

Comparison of Fare Payment Method – Minorities vs. Non-Minorities

Fare Payment Method	Minorities	Non-Minorities
Cash	4.8%	4.1%
Regular 30-day Breeze Pass	21.5%	25.9%
1-7 day Breeze Pass	37.7%	18.8%
Breeze Card with Specific Number of Trips	15.6%	32.1%
Breeze Card with Specific Stored Dollar Amount	13.4%	12.4%
Reduced-Fare Breeze Card	4.7%	2.9%
Mobility Breeze Card	0.6%	0.6%
Other	1.7%	3.2%
Percent of Sample	84.5%	15.5%

Comparison of Trips Per Week – Minority vs. Non-Minority Riders

Trips Per Week	Minorities	Non-Minorities
Light (0-4 per week)	23.5%	32.4%
Moderate (5-8 per week)	19.5%	21.5%
Heavy (9 or more per week)	57.0%	46.1%
Mean	9.1	7.7

Comparison of Fare Payment Method – Low Income (Under \$25,000) vs. Medium or High Income

Fare Payment Method	Low Income	Medium or High Income
Cash	5.0%	3.5%
Regular 30-day Breeze Pass	18.6%	25.9%
1-7 day Breeze Pass	39.4%	31.8%
Breeze Card with Specific Number of Trips	14.8%	19.4%
Breeze Card with Specific Stored Dollar Amount	13.9%	13.7%
Reduced-Fare Breeze Card	6.4%	2.4%
Mobility Breeze Card	0.5%	0.6%
Other	1.3%	2.7%
Percent of Sample	50.2%	49.8%

Distribution of Transit Amenities

The Service Standards outline how MARTA ensures equity for minority, low-income and LEP populations in the distribution of transit amenities.

Bus Shelter and Bench Placement - Bus Shelter and Bench Placement of bus shelters or benches at bus stops involve the consideration of several factors. Planning provides the bus shelter contractor with a list of stops that qualify for placement of a bus shelter or bench at the beginning of each markup period based on scoring of these factors:

- Ridership:
 - Ridership for a bench: 7 boardings per day.
 - Ridership for a shelter: 15 boardings per day.
- Bus Stop Level of Service (span of service, average trip frequency).
- Proximity to other shelters.
- Equity/Title VI Compliance; existing bench or shelter locations were considered for equity in distribution within the service area.

Shelters and Local Land Use - Since advertising displays are not always conducive to the locations where shelter demand exist, the MARTA bus shelter contract annually allows for the placement of 10 shelters without advertising. Additionally, the scoring mechanism above

addresses the need for equitable shelter placement. MARTA reviews shelter placement to ensure equity throughout the service area, regardless of advertising status.

Shelter locations are also evaluated based on input from customers and staff through the Bus Stop Request Form on the www.itsmarta.com website and on requests received by Customer Services. All proposed shelter or bench locations have a field evaluation for viability. The following factors are considered in field evaluation:

- The location is required to accommodate a concrete pad and be set back 10 feet from the roadway.
- The location is required to be ADA compliant which includes being wheel chair accessible.
- The surface of the location is required to be flat and not on a slope, next to a guard rail/barrier, or a fire hydrant.
- The bench or shelter should not block vehicular traffic.
- The site is required to comply with all other requirements of the local jurisdiction, including local ordinances and design guidelines.

Once a site is approved for a bench or shelter, based on the above criteria, a survey is completed, site drawings are produced, and permit applications are completed for each location. The entire packet is then submitted for the appropriate approval.

Rail Station Amenities

In order to provide equity in amenities, all MARTA rail stations are required to contain:

- Passenger information case with a system map and individual route schedules that service that particular station.
- Trash receptacles.
- Emergency phones to contact MARTA Police in case of an emergency.
- Electronic Sign Posts which provide traveler information, including arrival time of next train and advertisement.
- Other amenities are distributed equitably throughout the MARTA service area.

Vehicle Amenities

Amenities in vehicles are equitably distributed as follows:

- The Rail Network: Television-type displays placed on MARTA rail cars. The Rail Network displays offer news, MARTA marketing information, advertising, and radio channels for passengers.

- Bike Racks: All 30, 35, and 40-foot buses in the fixed-route vehicle fleet are outfitted with fold-down bicycle racks capable of holding two bikes.

Evaluating Service and Fare Changes

The current requirements under FTA Circular 4702.1B, in relation to “adverse effects”, Major Service Change Policy, Disparate Impact and Disproportionate Burden Policies, are new and currently being drafted to reflect the changes in the new circular requirements. A draft of the proposed definitions, procedures and a timeline for completion are outlined under the drafted Title VI Policies and Equity Analysis Procedures document **Exhibit 37**; these items are projected to be finalized within the next 8-12 months.

During the plan period, MARTA conducted public outreach/engagement and public hearings to receive and consider public input during the planning and development stages. Currently all major service changes are approved by the MARTA board; MARTA has provided a copy of the February 2012 board minutes to reflect this requirement. This draft also includes a public participation plan. Once the draft of the Title VI Policies and Equity Analysis is complete, as per Title VI Circular 4702.1B, MARTA will ensure that it is approved by the Board. All upcoming analysis will be completed using the new circular.

Fare Change Procedures

MARTA’s Quality of Service Surveys (**Exhibit 38**) have the most current information on fare payment methods and other items such as: rider demographics, loyalty, and satisfaction. Information from the surveys was used to complete the tables found in the demographic profile. Questions taken directly from the report were cross tabulated to get more specific demographic data used for the analysis. Essentially, MARTA’s Research and Analysis Department cross tabulated fare payment method by multiple other demographic items, such as age, annual household income, gender, and race/ethnicity. The criterion used to determine this is whether a demographic group’s percentage of usage of a specific fare payment method is greater than half standard deviation higher than the group’s overall MARTA usage, regardless of fare payment method.

Definition and Analysis of Adverse Effects Related to Major Changes in Transit Service

The requirement to define “adverse effects”, in Circular 4702.1B, is new. MARTA currently measures adverse effects (previously termed “disproportionate impacts” or “adverse impacts”) by comparing minority/low-income populations affected by service changes to their overall representation in the MARTA service area. This current procedure is outlined in the Determination of Disproportionate Impact section below.

Under the guidelines of the new FTA Title VI Circular, 4702.1B, MARTA has drafted a definition for “adverse effects” for service and fare changes within the Title VI Policies and Equity Analysis Procedures draft overview (**see Exhibit 37**).

Determination of Disproportionate Impact

To determine disproportionate impacts to populations within the MARTA service area, minority and low-income populations are quantified by route for all impacted census tracts. For this

analysis, data from the 2000 Census was used. To calculate minority impacts, we used the minority populations specified in the FTA Circular; to calculate poverty impacts, we used the number of households in poverty.

Per guidelines provided in FTA circular 4702.1A, these impacts are quantified separately for route changes and span of service changes. Using these figures, percentages for impacted minority and low-income populations are calculated for each change on each route as follows:

- Impacted Sensitive Population / Total Population = % impacted population

MARTA has provided a draft of proposed language for Major Service Change, Disparate Impact and Disproportionate Burden policies and draft procedures (Title VI Policies and Equity Analysis Procedures) for carrying out service and fare equity analysis for all transit modes (**see Exhibit 37**).

Major Service Change Procedures

The Urban Mass Transportation Act of 1964 as amended requires that recipients of federal financial assistance establish a local process to receive and consider public comment prior to fare changes and major service reductions. In addition, MARTA's enabling legislation (MARTA ACT) provides that:

“The Board shall determine by itself exclusively after public hearings as hereinafter provided, the routes, to be operated by the Authority, the scheduled services to be made available to the public and, the amounts to be charged therefore. Before making any determinations as to scheduled services or amounts to be charged for such services,....the Board shall first hold at least one public hearing after giving notice of the time and place by twice advertising on different days in the newspaper having the largest circulation in the metropolitan area not more than ten days or less than five days prior to the hearing. As to all other matters, the Board may hold such public hearings as it may deem appropriate, and as to all public hearings, it may prescribe reasonable rules and regulations to govern such hearings not inconsistent with the Act.”

The MARTA Board of Directors (the Board) requires that the following service change actions be taken only by the Board following the public hearing process referenced in the MARTA ACT, above:

The establishment of a new bus route to include the initial service alignment and headway parameters for that route.

A substantial geographical alteration: Addition or deletion of more than one and one-half (1½) directional miles on a given route.

The discontinuation of any bus service not under the demonstration project status.

A major route modification which causes a 25% or greater reduction in the number of daily trips provided. This may also apply to route segments as appropriate.

Implementation of new service.

An accurate stenographic transcription or audio recording will be made of each public hearing. Public hearings will be held at facilities convenient to the affected customers and accessible to the disabled.

The quantified population percentages are then compared to the MARTA service area averages for minority and low-income populations. When the percentages for impacted minority and low-income populations are higher than the service area average for these populations, impacts are considered disproportionate.

Service area average thresholds are as follows:

Population Threshold

Minority 58.7%

Low-Income 11.8%

Determination of System-Level Impacts

To determine the final system-wide impacts of the service changes, MARTA will compare the percentages for impacted minority and low-income populations (all impacted tracts) to the service area average (threshold). If the percentages for impacted minority and low-income populations exceed the service area averages, the changes overall will be considered.

MARTA is updating the current procedure (Title VI Policies and Equity Analysis Procedures) to reflect revised circular (**see proposed draft-Exhibit 37**). Once the draft of the Title VI Policies and Equity Analysis is complete, as per Title VI Circular 4702.1B, MARTA will ensure that it is approved by the Board. All upcoming analysis will be completed using the new circular.

Following is the analytical process that was used to determine whether disparate impacts exist during the last plan year:

MARTA looked at the impacts on a route-by-route basis. For each route, MARTA provided the following information:

- A brief description of the service change
- Ridership impacts of the service change
- Demographic impacts of the service change
- Description of available service alternatives for impacted riders

Analysis was conducted using GIS. Ridership data was examined at the stop level, allowing us to identify a precise estimate of how many people would be affected each change. Demographic data was summed to the route level by tract in the following ways:

- If a route had headway changes or was discontinued, all tracts along the route were assessed.
- If a route had a routing change, only tracts along the affected route segment were assessed.

- If a route had span of service changes, only tracts where ridership activity was present during the proposed discontinued times were assessed.

Once minority and low-income population data had been summed for the impacted tracts on a route, a percentage was taken for these populations and compared to the service area averages. If a route change would affect a higher percentage of minority or low-income riders than were present in the service area, it was considered as having potentially disproportionate impacts.

Information for all changes on a route was compiled and presented in our report under Section IV – Analysis of Service Changes. Maps of demographics and route changes in the service area were provided in Appendix A; maps of each route change (that involved a geographic change) were provided in Appendix B.

4702.1A Requirements

Regarding specific requirements of the FTA Circular, Chapter V, Section 4, Option A, MARTA did the following.

To fulfill requirement 1, which asks recipients to “assess the effects of the proposed service change on minority and low-income populations:”

For route changes (a):

- As required by the circular, MARTA provided a map “of the routes that were eliminated, reduced, added, or expanded, overlaid on a demographic map of the service area that highlights census tracts... where the total minority and low-income population is greater than the service area average.”
- Maps of routes that were changed and the service area’s minority and low-income tracts are contained in Appendix A of our report.
- The data from these service area maps is present on all route-level maps that show routing changes and discontinued routes. These maps are contained in Appendix B of our report.

For span of service (b):

- We did not have data from ridership surveys to indicate whether low-income or minority riders were more likely to use the service during the hours and/or days that would be eliminated.
- As a result, we used ridership data in conjunction with demographic data to assess these impacts, specifically identifying ridership activity during the time period proposed for changes.

To fulfill requirement 2, which asks recipients to “Assess the alternatives available for people affected by the fare increase or major service change:”

- MARTA analyzed available alternatives for service wherever changes were made and provided a summary of these alternatives for each route in Section IV of our report.

To fulfill requirement 3, which asks recipients to “Describe the actions the agency proposes to minimize, mitigate, or offset any adverse effects of proposed fare and service changes on minority and low-income populations,” we provided:

- A description of our service planning processes that are designed to mitigate impacts to minority and low-income communities (specifically the Lifeline service designation)
- A description of our data-based planning process that was designed to minimize ridership impacts
- A description of internal cost-containment measures that were enacted for the Fiscal Year
- A description of the public input process and changes made to the service plan as a result of public participation

To fulfill requirement 4, which asks recipients to “Determine which, if any, of the proposals under consideration would have a disproportionately high and adverse effect on minority and low-income riders,” we provided:

Route-by-route descriptions of ridership and demographic impacts, along with other related information fulfilling requirement 2. These descriptions detail, using the methodology supplied in this document, which route changes could result in potentially adverse impacts.

The 2010 Quality of Service Survey had the most current information on fare payment methods and other items such as: rider demographics, loyalty, and satisfaction. Information from the surveys was used to complete the tables found in the demographic profile. Questions taken directly from the report were cross tabulated to get more specific demographic data used for the analysis.

In addition, MARTA cross tabulated fare payment method by multiple other demographic items, such as age, annual household income, gender, and race/ethnicity. The criterion used to determine this is whether a demographic group’s percentage of usage of a specific fare payment method is greater than half standard deviation higher than the group’s overall MARTA usage, regardless of fare payment method.

Evaluation Procedures

The procedure for the Service and Fare Equity Analysis are outlined in the data below in the Title VI analysis for the 2009 service and fare changes. The MARTA August 15 Markup, Title VI Assessment is attached (**Exhibit 39**). The extensive Streetcar Title VI Analysis files are available upon request.

Since the last Plan year (FY 2010 to FY 2012), MARTA implemented two increases in the base fare and a three-year gradual increase in the fares for MARTA Mobility and Reduced Fare patrons. MARTA increased the parking fee at lots with long term parking. All of these changes were evaluated in advance by a Title VI analysis of fare changes (**Exhibit 40**).

Evaluation of Service and Fare Changes in 2009

As a result of the severe economic downturn, MARTA anticipated a transit-related sales tax receipt shortfall in FY 2009 and additional shortfalls over the subsequent ten years. With this serious downturn in the economy, MARTA began the process of taking measures that would improve its financial viability and productivity. Such measures included an increase in passenger fare and a reduction in its delivery of transit services which constituted a major service change. According to the MARTA Act:

“The Board shall determine by itself exclusively after public hearings as hereinafter provided, the routes, to be operated by MARTA, the scheduled services to be made available to the public and, the amounts to be charged therefore. Before making any determinations as to scheduled services or amounts to be charged for such services, the Board shall first hold at least one public hearing after giving notice of the time and place by twice advertising on different days in the newspaper having the largest circulation in the metropolitan area not more than ten days or less than five days prior to the hearing. As to all other matters, the Board may hold such public hearings as it may deem appropriate, and as to all public hearings, it may prescribe reasonable rules and regulations to govern such hearings not inconsistent with the Act.”

The MARTA Board of Directors (the Board) requires that the following service change actions be taken only by the Board following the public hearing process referenced in the MARTA ACT, excerpt above:

- The establishment of a new bus route to include the initial service alignment and headway parameters for that route.
- A substantial geographical alteration: Addition or deletion of more than one and one-half (1½) directional miles on a given route.
- The elimination of any bus service not under the demonstration project status.
- A major modification which causes a 25% or greater reduction in the number of daily trips provided.
- Implementation of new service.
- An accurate stenographic transcription or audio recording will be made of each public hearing. Public hearings will be held at accessible facilities convenient to the affected customers and accessible to the disabled.

In addition to the provisions of the MARTA Act, MARTA was cognizant of Title VI of the Civil Rights Act of 1964, which outlined MARTA’s responsibility to guarantee that all transit service, and access to its facilities, were equitably distributed and provided without regard to race, color, or national origin. Therefore, MARTA was committed to ensuring equal opportunities for all individuals to participate in all local, sub regional and regional transit planning and decision-making processes.

On June 12, 2009, MARTA completed a Title VI Assessment of Fare and Parking Fee Change Proposals that evaluated several fare change scenarios. This would be the first fare increase since 2001. Of the scenarios that were considered, MARTA decided to adopt a multi-year fare increase scenario phased in over the three year period of FY 2010, FY 2011 and FY 2012. It would reflect an increase of 25¢ in the Base Fare and corresponding Multi-Ride Instrument

increases; increase Time-Based Pass prices and multiples gradually (e.g., increase monthly pass multiple to 32 and 34 in 2011 and 2012 respectively). Fare increases for MARTA Mobility (Para transit) patrons and reduced-fare patrons would be increased gradually over the three year period.

MARTA proactively gave special consideration and review as to the Title VI implications of said proposals, to ensure that MARTA took no action that violated federal mandates as outlined in FTA Circular 4702.1 A, which was the current mandate during the period when MARTA conducted the Title VI Assessment of Fare and Parking Fee Change Proposals, June 12, 2009. A summary of the proposed fare instruments and pricing levels is shown in **Exhibit 41**.⁵

While MARTA projected that every consumer would be affected by a fare increase and the level of service changes, the greatest impact would be on some protected segments of the population such as minorities and low-income earners. In order to guarantee that MARTA was in accordance with FTA mandates, the 2009 Title VI Assessment of Fare and Parking Fee Change Proposals examined the proposed fare changes and their impacts. This assessment also closely analyzed the specific minority populations that could potentially be adversely affected, as well as, the measures that could potentially be taken to reduce these effects on the protected groups within the service area.

Quality of Service Survey Regarding The Evaluation of 2009 Service and Fare Changes

During the time of the analysis, the 2008 Quality of Service Survey conducted by the Office of Research and Analysis was the most current Service Survey on items such as: rider demographics, loyalty, and satisfaction. Therefore, the 2008 Survey data was utilized in order to conduct the Title VI equity analysis for the fare and service change proposals. The 2008 Quality of Service Survey contained information collected from the Office of Research and Analysis where "Research surveyors conducted 9,551 face-to-face General Rider interviews on board the rail and fixed route bus systems." The survey contained 36 questions used to determine specific information measured in the report such as: frequency of ridership, income, age, and race/ethnicity. Information from the survey was used to complete the tables found in the demographic profile. Questions taken directly from the report were cross tabulated to get more specific demographic data used for the analysis.

In addition to gauging patron's riding experience, the Quality of Service Survey also provided demographic information such as age, annual household income, gender, and race/ethnicity. The information from the Quality of Service Survey supported the notion that some minority groups could be affected by the proposed fare and service changes.

According to the FTA, low income was defined as, "a person whose median household income is at or below the Department of Health and Human Services' poverty guidelines." The MARTA Office of Planning referenced poverty as 125% of the federal definition of poverty for a family of four. The poverty level for a family of four was \$21,200 and if you apply the 125% measure as noted above, it equated to a lifetime threshold of \$26,500. However, because information from the Quality of Service survey was collected in \$10,000 increments, low income would be referenced mostly as individuals who make less than

⁵ Title VI Assessment of Fare and Parking Fee Change Proposals, June 12, 2009, Office of Research & Analysis, Metropolitan Atlanta Rapid Transit Authority.

\$29,999. Therefore, the Quality of Service Survey does not have information to pinpoint the threshold of \$26,500.

The minority groups that would be affected by the proposed fare change scenarios included the Black/African American, Hispanic and Asian American populations. By looking at the race/ethnicity of general riders, it was easy to pinpoint the minority groups that would be most affected by the fare changes. Almost fifty percent (48.8%) of Hispanic riders and 45.4% of Black/African American riders purchase short-term passes, compared to the 20.7% purchased by White riders. In addition, 61.8% of Asian Americans purchase Monthly passes. They will be negatively impacted because the price of the monthly pass was going up from \$60 to \$68. Asian Americans purchase monthly passes at a higher rate than White riders, who purchase said monthly passes at a 33.9% rate. Thus, any change in fare for short-term passes would have a negative effect on African American/Black and Hispanic riders since both populations account for the highest totals of short term passes purchased by MARTA riders. Based on the research that was conducted, MARTA developed a table depicting the demographic groups most impacted by the change in fare media (**Exhibit 42**).

In addition, based on the most current Quality of Service Survey at the time of the analysis (FY 2008), a graph to reflect the race and ethnicity of general riders was also used in the analysis. This graph showed that Blacks/African Americans accounted for three quarters of MARTA ridership (75.9%) (**Exhibit 43**).

MARTA also utilized the available data from the two most recent Quality of Service Surveys (FY 2011 and FY 2012) to generate a graph which showed the race distribution of MARTA riders⁶.

Plans to Mitigate Impacts of Fare Change

According to the FTA, a transit agency like MARTA may implement a major fare and service change that potentially has an adverse impact on protected minority groups as long as they carry out mitigation efforts to buffer the effects of same. MARTA took steps to mitigate the impacts incurred by minority and low income persons through the multiple approaches mentioned below:

- Continuing the discounting of short term seven day passes and long term monthly passes.
- Continuing to accept full fare cash on the buses as a convenience for our customers.
- While the loading of Breeze cards on the buses at some point in the future will be discontinued, MARTA is exploring an expanded network of retail outlets disbursed throughout the community that can offer MARTA Breeze media through Point of Sale and/or pre-value loaded cards.
- MARTA will also utilize its recently received New Freedom Travel Training demonstration grant in this regard. The intent of this grant is to develop a program that acquaints all aspects of the MARTA ridership base with how to ride the system and make the best economic decisions about choices of fare media.

⁶ Quality of Service Survey. 2012. Office of Research & Analysis, Metropolitan Atlanta Rapid Transit Authority.

- MARTA is developing a web based system that will allow patrons to electronically load their Breeze card. This will be of great benefit for the MARTA ridership as a whole and Mobility Service (i.e., Para-transit) patrons more specifically.
- Utilize a multi-year phase in approach for any fare increase implemented. This would apply to all corresponding Multi-Ride Instrument increases; increase Time-Based Pass prices and multiples gradually (e.g., increase monthly pass multiple to 32 and 34 in 2011 and 2012 respectively). No change in University, K-12, and Homeless programs. Other mitigation measures being explored included the following:
 1. Placement of excess Breeze Ticket Vending Machines (TVM's) presently located in certain stations in strategic and high track retail locations that are easily accessible to majority of our patrons.
 2. Acquisition of small counter top machines that will be placed in retail locations that previously sold MARTA magnetic strip cards (169 locations) so that customers can conveniently load their cards as they carry out their normal daily activities.
 3. Facilitating the continuance of TVMA(s) and the provision of related discounts that encourage even more employers to participate in the program.

To supplement these mitigation measures, MARTA developed and instituted a comprehensive communication program that ensured the acquisition of comments from minority groups, low income persons, seniors, individuals with disabilities and the ridership base as a whole before any fare increase decisions are ultimately made and finalized. The comprehensive communication plan meets Title VI and Environmental Justice requirements and encompasses community meetings; meetings with local and state, and federal stakeholders; news releases; public hearings; meetings with businesses and professional associations; and the printing of factsheets, notices and announcements in different languages, newspapers and flyers.

Assessment of Proposed Parking Changes

As part of the MARTA 2009 study to determine potential changes to the MARTA fare structures, several potential changes to the MARTA parking fees were proposed. MARTA operates thirty-eight (38) rail stations. Of this total, twenty eight (28) stations have parking lots for daily parking. Nine (9) of the 28 stations have long term parking available for a fee. The remaining stations have parking lots that are unattended and offer parking at no charge. These locations include East Point, College Park, Lakewood, Oakland City, West End, Midtown, Art Center, Chamblee, H.E. Holmes, West Lake, Bankhead, Ashby, Vine City, King Memorial, Inman Park, Edgewood, East Lake, Avondale, Kensington and Indian Creek.

MARTA considered four proposed scenarios that would yield revenue for those station parking lots that were unattended and offered parking at no charge. In assessing each proposed parking fee scenario, MARTA used data derived from its FY 2008 Quality of Service survey. This survey revealed that 16.1% of MARTA patrons drove to a station to access the system in 2007 and 2008. To better assist us in our analysis, we defined some measures that were derived from the Federal Transit Administration's Title VI Guidance and the MARTA service standards. From the FTA Title VI guidance, we used the definition for low income, which is "a

census tract is defined as Low-Income if its median household income is less than \$26,500 (125% of the Federal poverty standard for a family of four).” From the MARTA service standards we acquired the definition of transit dependent, which is “a census tract is defined as Transit-Dependent if its percentage of residents without vehicle access exceeds 27.5%” (the MARTA service area average).

Using these two parameters as a guide, we assessed the areas in which presently configured free parking is located (**Exhibit 44**). Our analysis of MARTA station locations indicates that the majority of stations on the West and South rail lines are located in or adjacent to low-income areas. Stations with parking that are surrounded by highly transit-dependent patrons include Vine City, Ashby, and Lakewood-Ft. McPherson. Stations that are adjacent to low income and non-low income census tracts include H.E. Holmes, West Lake, West End, Oakland City, East Point and Edgewood /Candler Park.

Given the above, none of the parking change scenarios would have a significant Title VI or Environmental Justice impact on the Vine City, Ashby and Lakewood- Ft. McPherson Station parking areas because they are located in low income census tracts that have a high level of transit dependency. This is important in that transit dependency carries with it a lack of access to a car. All proposed change scenarios would have an impact on non-low income census tracts adjacent to H. E. Holmes, West Lake, West End, Oakland City, East Point and Edgewood/Candler Pak. Although MARTA does not have very definitive data on patrons parking at these stations, our ridership base is 75.9% Black/African American and 7.5% Hispanic. As a result, we have surmised that with the high number of minorities that reside in these respective areas all proposed change scenarios would have a noticeable impact on minority group persons.

None of our stations with parking on the Red and East Lines are located in low income or Title VI sensitive population areas. In addition, an examination of maps depicting levels of transit dependency in low-income census tracts clearly show that the Red and Red East Lines would not have any Title VI or Environmental Justice Impacts on census tracts in the aforementioned categories surrounding stations located in these areas. In most cases, low-income or minority riders who live near stations and would be impacted by an increase in parking fees can alternatively access MARTA rail stations using the MARTA bus services. Using bus services to reach MARTA stations would not increase the cost of making a trip, provided that patrons have a Breeze card to transfer between the bus and rail systems for free.

Evaluation of Service and Fare Changes in 2011

As a result of the severe economic downturn, MARTA anticipates a transit-related sales tax receipts shortfall of at least \$25.3 to \$32.2 million in FY 2012 and about \$25.1 to \$34.3 million in FY13. The lower than average sales tax returns have cut deeply into the MARTA revenue since local sales tax accounts for over half (52%) of the MARTA operating budget. With this serious economic challenge, MARTA is in the process of taking measures that would improve its financial viability and productivity, one of which is an increase in passenger fares.

A fare impact study was conducted and several scenarios were devised to help MARTA gauge the impact of certain incremental fare increases and parking fee combinations. Studies show a correlation between ridership and transit ticket fares increases. Traditionally when fares increase ridership decreases. When other variables are added to the equation, there can be further impact on ridership. In order to conduct the Title VI equity analysis for the fare proposals, MARTA combined information from the MARTA 2008 Quality of Service Survey, the

Atlanta Regional Commission's 2009 On-Board Survey, the 2010 Quality of Service Survey the 2010 Passenger Revenue Fare payment split, and the Fare Elasticity Model to complete the analysis.

The 2008 Quality of Service Survey, ARC 2009 On-Board Survey and the 2010 Quality of Service Survey collectively have the most current information on fare payment methods and other items such as: rider demographics, loyalty, and satisfaction. Information from the surveys was used to complete the tables found in the demographic profile. Questions taken directly from the report were cross tabulated to get more specific demographic data used for the analysis.

The Fare Elasticity Model uses a baseline set of fare categories and average fares to project the future average fare based on proposed fare changes. The three fare scenarios were:

1. Scenario ABD: Increase of 25 cents in the Base Fare plus an additional change in the monthly pass multiple from 34 to 38 trips, and in the weekly pass multiple from 8.5 to 9.5 trips.
2. Scenario CF: Increase of 50 cents in the Base Fare plus an additional change in the monthly pass multiple from 34 to 38 trips, and in the weekly pass multiple from 8.5 to 9.5 trips.
3. Scenario E: Increase of 25 cents in the Base Fare plus an additional change in the monthly pass multiple from 34 to 40 trips, and in the weekly pass multiple from 8.5 to 10 trips.

The fare analysis indicated that:

- Scenario ABD would result in a 6.26% decrease in ridership while providing a 16.5% increase in revenue.
- Scenario CF would result in a 9.2% decrease in ridership while providing a 24.9% increase in revenue.
- Scenario E would result in the highest possible decrease in ridership (7.65%) and a 19.65% increase in revenue.
- MARTA adopted Scenario CF (a base fare increase of .50) and implemented the increase on October 2, 2011. The fare impact study indicated that the following impact on minority and low income riders could be expected: This scenario would cause a significantly negative impact on minority low income and transit dependent riders. Under scenario E, Black/African Americans, Hispanics, Native Americans, individuals under age 24, and low income riders would encounter negative effects from the fare change. They would see a 12.5% to 22.4% change in fare. (Current short-term fare is \$17.00 and the proposed scenario E, fare is \$21.50).
- Half-fare riders would be impacted the same in each scenario. The 11.1% Change in the fare under Scenario E would have an adverse because over 54.4% of the MARTA half-fare population is over the age of 65 and 59.8% of half-fare riders have annual incomes that are less than \$10,000 per year. Over seventy-

five percent (75.1%) of the MARTA half-fare riders are Black/African Americans (refer to scenario ABD for further percentage breakdowns).

- Mobility riders would be impacted the same in each scenario. The 32.4% change in Para-transit fare would adversely affect almost all of the mobility rider population. An overwhelming 89.7% of mobility riders have annual incomes of less than \$29,999 and over eighty percent (82.8%) of mobility riders are Black/African American.

Plans to Mitigate the Fare Change Impacts:

For fare Scenario C and F, MARTA carried out the following mitigation efforts:

1. MARTA is creating a Transit Management Association Breeze Card for Mobility Service patrons. This will assist individuals with a disability to acquire a Breeze Card through their TMA employer at a discounted rate of up to 10%.
2. MARTA will stagger any fare increases for seniors and individuals with disabilities over a multi-year period. Given that 56.4% of Reduced Fare rider and 89.7% Mobility service riders are low income individuals, the staggering of the fare increase over time will buffer the impact for those respective groups, which are predominately Black/African American, transit dependent and low income. In addition, MARTA will retain the 10 trip pass, 20 trip pass and monthly pass concepts for MARTA Mobility patrons, so that they have optional ways of paying for fare media within their financial means.
3. MARTA will continue the use of discounted weekly and monthly transit passes that will now offer multiples that are more in line with industry standards. Since the system average clearly indicates that 60.7% of MARTA patrons make less than \$30,000 a year, the discounted transit media will buffer the impact of the increase in fare for minority, low income and transit dependent individuals. They will be able to travel within the constraints of the multiples on their cards and they will be able to diminish the impact of a fare increase on their incomes.
4. MARTA will not pursue any reduction in Bus or Rail fixed route services in FY12.
5. MARTA will not institute any differential in cost for fixed route bus versus fixed route rail.
6. MARTA will continue to allow eligible Mobility customers to ride fixed route services free of charge.
7. MARTA will not charge patrons a transfer fee. MARTA has reduced the acquisition cost of its hard plastic Breeze Card from \$5.00 to \$1.00. This will provide an increased number of MARTA patrons with the ability to acquire a hard plastic Breeze Card that can be reloaded. This will allow patrons that have been purchasing limited use fare media to save the amount of the surcharge for said media. They will now have more money that they can load on their Breeze Card, as needed.

8. MARTA will be implementing a web based fare system that will allow patrons to electronically load their Breeze cards via a computer. This will be of great benefit for the MARTA ridership as a whole, as they consider their ridership patterns and the distances they have to travel. This will be of the greatest benefit to minority, transit dependent, low income patrons, who may not be in the immediate vicinity of a media sales outlet or a rail station. This will assist them in the deterrence of any unnecessary expenses that are incurred going to and from a media sales outlet just to load or check the balance on their Breeze card. In addition, the fare loaded on their cards through this approach will appear on their Breeze Cards within two to three hours.

Riders Opinions About Quality of Service - The Quality of Service Survey was conducted by the MARTA Office of Research and Analysis almost every year since 1995. Since FY 2008, the QOS Survey was conducted for four out of five years (FY 2008, FY 2010, FY 2011, and FY 2012). Topics covered by the survey include overall satisfaction, willingness to recommend MARTA to others, future riding intentions, satisfaction with specific performance areas, and patrons' experiences with nuisance behaviors on or throughout the system. By continuously monitoring riders' opinions of specific performance areas (i.e. interior cleanliness of buses, frequency of train service on weekdays, etc.), the Office of Research and Analysis is able to keep MARTA up-to-date on areas that are performing well and those that require attention. In the most recently completed fiscal year, FY 2012, the QOS assessed 42 individual performance areas, each from one of the following service categories: cleanliness, customer service, employee performance, safety, mechanical reliability, and on-time performance.

Demographic Ridership and Travel Patterns - The MARTA Demographic ridership and travel patterns were also collected through the Quality of Service Survey. Demographic information includes race, age, gender, education, and household income. The QOS also collects information on rider characteristics such as transit dependency, number of years riding the system, frequency of usage, and trip purpose. MARTA used this information to develop demographic profiles comparing minority riders and non-minority riders on variables that included trip purpose, transit dependency, income, age, gender, education, and travel frequency. In addition, demographic information was collected on fare usage by fare type amongst minority users and low-income users, in order to assist with fare equity analyses. MARTA also included charts and tables to summarize demographic information.

Service Area Demographics - In FY 2011, Research and Analysis published a Customer Demographic Profile of MARTA Rail Stations report that provided demographic information, trip purpose, and transit dependent status for all of the 38 stations, broken down by weekday versus weekend. The publication also reported ridership totals for each station. Demographic information by rail station has been used to develop profiles of the ridership by station, including the identification of stations that serve areas with high percentages of minority residents and low income households (**Exhibit 45**).

Information about Language Barrier Constraints - In addition, as consistent with DOT LEP guidelines, MARTA took steps to translate customer surveys into Spanish, or provided translation services in the course of conducting customer surveys. When Research and Analysis surveyors encounter LEP riders, they use the I-Speak Card to identify and record the rider's language.

IV. Key Definitions and Terms

For the purpose of implementing the 2012 Title VI Program Update, MARTA combined definitions from the MARTA FY 2012 Service Standards and FTA Circular 4702.1B, Chapter I, Part 5⁷:

1. **Accessibility:** As defined in the MARTA 2012 Service Standards, this term refers to the extent to which facilities are barrier free and usable by persons with disabilities, including those who use wheelchairs.
2. **Central Business District (CBD):** As defined in the MARTA 2012 Service Standards, the downtown retail trade in a commercial area of a city or an area of very high land valuation, traffic flow, and concentration of retail business offices, theaters, hotels and services.
3. **Cost-effectiveness:** As defined in the MARTA 2012 Service Standards, this term refers to an analytical technique used to choose the most effective method for achieving a program or policy goal.
4. **Demand Response System:** Any non-fixed route system of transporting individuals that requires advance scheduling including services provided by public entities, non-profits, and private providers. An advance request for service is a key characteristic of demand response service.
5. **Designated Recipient:** As outlined and defined under FTA Circular 4702.1B, this term refers to an entity designated, in accordance with the planning process under Sections 5303 and 5304, by the Governor of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under Section 5336 to urbanized areas of 200,000 or more in population; or a State or regional authority, if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.
6. **DEO:** The MARTA Diversity and Equal Opportunity Office (DEO) administers the agency's Title VI, Disadvantaged Business Enterprise, Equal Employment Opportunity and Affirmative Action Programs and also monitors environmental justice assessments and ADA compliance.
7. **Direct Recipient:** An entity that receives funding directly from FTA. A direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to sub-recipients, whereas a primary recipient does.
8. **Discrimination:** Refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior treatment based on race, color, or national origin.

⁷ Unless otherwise referenced, specific terms were derived from the definitions found in FTA Circular 4702.1B.

9. **Disparate Impact:** The results of a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
10. **Disproportionate Burden:** Refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.
11. **Disparate Treatment:** Refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.
12. **EDAAC:** As defined by MARTA, the Elderly Disabled Access Advisory Committee (EDAAC) was established by MARTA to assist in better serving the transportation needs of seniors and individuals with disabilities. EDAAC also intersects with a cross section of individuals from minority, low-income and LEP populations.
13. **Fixed Guideway:** A public transportation facility using and occupying a separate right-of-way for the exclusive use of public transportation; using rail; using a fixed catenary system; or a passenger ferry system; or for a bus rapid transit system.
14. **Fixed Route:** Refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.
15. **Frequency:** As defined in the MARTA 2012 Service Standards, this term refers to the number of transit vehicles on a given route or line, moving in the same direction, that pass a given point within a specified interval of time, usually one hour.
16. **Federal Financial Assistance:**
 1. Grants and loans of Federal funds;
 2. The grant or donation of Federal property and interests in property;
 3. The detail of Federal personnel;
 4. The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient;
 5. Any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.
17. **Feeder:** As defined in the MARTA 2012 Service Standards, this term refers to a route that serves a rail station on one end and a residential community (or major destination) on the other. Travel is dominant in one direction by time of day and connects to the rail system.

18. **Headway:** As defined in the MARTA 2012 Service Standards, this term refers to the time interval between the passing of successive transit vehicles moving along the same route in the same direction, usually expressed in minutes.
19. **Land Use:** As defined in the MARTA 2012 Service Standards, this term refers to the purpose for which land or the structure on the land is being used, for example, residential, commercial, light industry.
20. **Local:** As defined in the MARTA 2012 Service Standards, this term refers to transit service that involves frequent stops and consequent low average speeds, the purpose of which is to deliver and pickup transit passengers close to their destinations or origins.
21. **Limited English Proficient (LEP) Persons:** Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.
22. **Limited/Limited Routes:** As defined in the MARTA 2012 Service Standards, this term refers to transit services provided on major arterial roadways, with longer stop spacing than local routes. Limited routes generally do not operate on limited access freeways.
23. **Low-income Person:** Means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. HHS guidelines refer to an individual whose family income is at or below 150 percent of the poverty line for a family of the size involved as low-income.
24. **Low-income Population:** Refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed or transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
25. **Minority persons include the following:**
 1. American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
 5. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
26. **Metropolitan Planning Organization (MPO):** The policy board of an organization created and designated to carry out the metropolitan transportation planning process.

27. **Metropolitan Transportation Plan (MTP):** The official multimodal transportation plan addressing no less than a 20-year planning horizon that is developed, adopted and updated by the MPO through the metropolitan transportation planning process.
28. **Minority Population:** Means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.
29. **Minority Transit Route:** A route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.
30. **National Origin:** Means the particular nation in which a person was born, or where the person's parents or ancestors were born.
31. **Noncompliance:** Refers to an FTA determination that the recipient is not in compliance with the DOT Title VI regulations, and has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding from participation in, or subjecting persons to discrimination in the recipient's program or activity on the basis of race, color, or national origin.
32. **Non-profit Organization:** A corporation or association determined by the Secretary of the Treasury to be an organization described by 26 U.S.C. 501(c) which is exempt from taxation under 26 U.S.C. 501(a) or one which has been determined under State law to be non-profit and for which the designated State agency has received documentation certifying the status of the non-profit organization.
33. **On-demand Service:** As defined in the MARTA 2012 Service Standards, also known as demand responsive or dial-a-ride service, this door-to-door service responds to passenger request made by telephone. It is typically operation in lieu of fixed route service with small vehicles in a geographical area that generates low levels of demand.
34. **Para-transit:** As defined in the MARTA 2012 Service Standards, this term refers to demand responsive transportation that requires a request for service and which does not necessarily operate on a fixed route or fixed schedule.
35. **Peak Period/Off Peak Period:** As defined and outlined in the MARTA 2012 Service Standards, this term refers to the period during a normal weekday when demand for transportation service is heaviest. Refers specifically to the hours of 6:00 a.m.–9:00 a.m. and 3:00 p.m.–7:00 p.m. Off-Peak refers to all other time periods. Note: weekend services are considered off-peak all day long.
36. **Peak Hour Only:** As defined in the MARTA 2012 Service Standards, the term refers to a transit route that operates on weekdays only during the AM and PM peak periods as defined.
37. **Predominantly Minority Area:** A geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority

persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

38. **Primary Recipient:** Any FTA recipient that extends Federal financial assistance to a sub-recipient.
39. **Productivity:** As defined in the MARTA 2012 Service Standards, this term refers to the ratio of units of transportation output to units of input; for example, vehicle miles per operator hour, or passenger miles per unit cost of operation.
40. **Provider of fixed route public transportation (or "transit provider"):** Any entity that operates public transportation service, and includes States, local and regional entities, and public and private entities. This term is used in place of "recipient" in chapter IV and is inclusive of direct recipients, primary recipients, designated recipients, and sub-recipients that provide fixed route public transportation service.
41. **Public Transportation:** Regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.
42. **Recipient:** Any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes sub-recipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.
43. **Regional:** As defined in the MARTA 2012 Service Standards, this term refers to transit lines with few stations and high operating speeds. They primarily serve long trips of long duration or distance within metropolitan regions, as distinguished from local transit service and short-haul transit service.
44. **Ridership:** As defined in the MARTA 2012 Service Standards, this term refers to the number of people making one-way trips on a public transportation system in a given time period.
45. **Route:** As defined in the MARTA 2012 Service Standards, this term refers to the geographical path followed by a vehicle or traveler from start to finish of a given trip.
46. **Route Spacing:** As defined in the MARTA 2012 Service Standards, this term refers to the distance between routes; calculated with such variable as potential riders per acre, walking distance to stops, and type of service being supplied.
47. **Service Standard/Policy:** An established service performance measure or policy used by a transit provider or other recipient as a means to program or distribute services and benefits within its service area.

48. **Segments:** As defined in the MARTA 2012 Service Standards, this term refers to the portions of routes delineated from others on the basis of such aspects as collection or delivery points, or the portion between these points.
49. **Service Class:** As defined in the MARTA 2012 Service Standards, this term refers to the delineation made between such types of service as local, limited, and regional.
50. **Statewide Transportation Improvement Program (STIP):** A statewide prioritized listing/program of transportation projects covering a period of four years that is consistent with the long-range statewide transportation program, metropolitan transportation programs, and TIPs, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.
51. **Stop Spacing:** As defined in the MARTA 2012 Service Standards, this term refers to the distance between consecutive transit stops.
52. **Sub-recipient:** An entity that receives Federal financial assistance from FTA through a primary recipient.
53. **Title VI Complaint:** A formal complaint, defined as any written complaint of discrimination on the basis of race, color, or national origin filed by an individual or group; signed by the complaining party on the MARTA complaint form seeking to remedy perceived discrimination by facially neutral policies, practices or decisions, which have an adverse impact which resulted in inequitable distribution of benefits, services, amenities, programs or activities financed in whole or in part with federal funds.
54. **Title VI/LEP Committee:** The MARTA internal inter-departmental task force created to address and strive to resolve Title VI compliance related issues presented to DEO by its employees, patrons and members of the general public.
55. **Title VI Program:** A document developed by an FTA funding recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.
56. **Transit Amenity:** As outlined in the MARTA 2012 Service Standards, this term refers to any service amenity, defined as any item or service that is provided specifically to increase the comfort and/or convenience of using the MARTA system. Currently available amenities include bus stops, bus shelters, benches, trash receptacles, system maps, individual route schedules, electronic sign post, emergency phones, customer assistance phones, pay phones, police phones, Rail Network television displays and bike racks.
57. **Transportation Improvement Program (TIP):** Refers to the Atlanta Regional Transportation Improvement Program prepared and published each summer by the Atlanta Regional Commission (ARC); this document outlines the long-term transportation Program for the region and includes input from MARTA and the Georgia Department of Transportation, as well as governmental and community groups in the seven member counties of Clayton, Cobb, DeKalb, Douglas, Fulton, Gwinnett and

Rockdale. The program contains a list/program of transportation projects covering a period of four years.

58. **Traffic Analysis Zones (TAZ's):** As defined in the MARTA 2012 Service Standards, this term refers to small geographic areas with common access to major streets used in travel demand modeling.
59. **Transfer:** As defined in the MARTA 2012 Service Standards, this term refers to a passenger's change from one transit unit or mode to another unit or mode.
60. **Transit Dependent Riders:** Riders who either: (1) live in a household which does not own a car; (2) who have a physical or mental disability that prevents the operation of a motor vehicle.
61. **Transit System:** As defined in the MARTA 2012 Service Standards, this term refers to the facilities, equipment, personnel, and procedures needed to provide and maintain public transit service.
62. **Transportation Improvement Program (TIP):** A prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by an MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.
63. **Transportation Management Area (TMA):** An urbanized area with a population over 200,000, as defined by the Bureau of the Census and designated by the Secretary of Transportation, or any additional area where TMA designation is requested by the Governor and the MPO and designated by the Secretary of Transportation.
64. **Travel Time:** As defined in the MARTA 2012 Service Standards, this term refers to the time duration of a linked trip on transit, that is, from the point of origin to the final destination, including walking time at transfer points and trip ends.
65. **Trip:** As defined in the MARTA 2012 Service Standards, this term refers to a one-way movement of a person or vehicle between two points for a specific purpose; sometimes called a one-way trip to distinguish it from a round trip.

Exhibits within this Title VI Program Plan are available for review upon request