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**METROPOLITAN ATLANTA RAPID TRANSIT
AUTHORITY
TITLE VI PROGRAM PLAN
UPDATE 2022-2025**



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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 policies 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; or
- 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 Federal Transit Administration (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 disproportionality high and adverse human health or environmental impacts of its programs, policies and activities; and
- Ensure that low-income and minority groups receive their fair share of benefits.

The Executive Director of Diversity and Inclusion 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 ongoing direction and program structure for ensuring compliance with Title VI and the functional responsibility of the Office of Diversity and Inclusion. However, I also expect every MARTA manager, supervisor and employee to be aware of and apply the intent of Title VI when performing their 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 that MARTA distributes federal funds to another entity, MARTA will monitor and ensure that each contractor at any tier and each sub-recipient at any tier prohibits discrimination on the basis of race, color or national origin and require the inclusion of non-discrimination language in all written agreements. Any person believing they have been discriminated against on the basis of race, color or national origin, in the provision of services, programs activities or benefits, may file a formal complaint directly with the Office of Diversity and Inclusion or the FTA.

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



Collie J. Greenwood
Interim General Manager/CEO



Date

I. INTRODUCTION AND TITLE VI PROGRAM OVERVIEW

The Metropolitan Atlanta Rapid Transit Authority (MARTA) is the rapid transit system in the Atlanta, Georgia metropolitan area and the twelfth largest in the United States. MARTA operates almost exclusively in Fulton, DeKalb, and Clayton counties, with bus service to destinations in Cobb County (Six Flags over Georgia and the Cumberland Transfer Center next to the Cumberland Mall). The MARTA service area population includes Fulton County (population average 1,063,937), DeKalb County (population average 759,297) and Clayton County (population average 292,256) with a combined three-county service population of over two million people. For the first four months of FY2022 (July-October 2021), the average daily ridership for the system (bus, rail, and Mobility) was 153,040 passengers.

In accordance with the requirements of the 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 by all internal stakeholders and approved by the MARTA Board of Directors (**Exhibit 1**).

To this end, Collie Greenwood, Interim General Manager/CEO of MARTA, is ultimately responsible for the overall implementation, administration, and monitoring of the Title VI Program. In turn, the MARTA GM/CEO has delegated this responsibility to Paula M. Nash, Executive Director of the Office of Diversity and Inclusion (D&I), who has a direct reporting relationship with the Office of the General Manager/CEO.

The Executive Director of D&I develops, directs, and manages the agency's strategic, long range and short-range Title VI Program and endeavors to ensure that they align with the overarching efforts of the organization. More specifically, the Executive Director of D&I provides strategic oversight for the MARTA Title VI Program updates, offers assurances to the 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 D&I professional staff members also support the objectives of the Title VI Program:

The Manager of Diversity and Inclusion provides daily management oversight of the development and administration of the Title VI Program and responds to FTA compliance audits. The individual is aided in this regard by the Equity Administrator.

The Equity Administrator provides continuous review and monitoring of policies, procedures, fixed facility analyses, and programming processes. This individual also ensures that outreach, special transit training, communication programs and the distribution of information in alternative formats meet Title VI and Limited English

Proficiency (LEP) requirements. Additional responsibilities, as the Equity Administrator, include the following:

- Processing the disposition of Title VI complaints received by MARTA.
- Collecting statistical data (race, color, 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 Title VI reviews of sub-recipients of federal funds directly distributed by MARTA.
- 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.

In tandem with the above, D&I 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 D&I 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. D&I 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.
- 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. KEY DEFINITIONS AND TERMS

For the purpose of implementing the 2022 Title VI Program Update, MARTA combined definitions from the MARTA Service Standards and FTA Circular 4702.1B, Chapter I, Part 5¹:

1. **Accessibility:** As defined in the MARTA 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 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. **Core:** Transit service that involves frequent stops and consequent low average speeds, the purpose of which is to deliver, and pick-up transit passengers close to their destinations or origins.
4. **Cost-effectiveness:** As defined in the MARTA Service Standards, this term refers to an analytical technique used to choose the most effective method for achieving a program or policy goal.
5. **D&I:** The MARTA Office of Diversity and Inclusion (D&I), formerly known as the Office of Diversity and Equal Opportunity (DEO), which 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.
6. **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.
7. **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 MARTA is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.
8. **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.

¹ Unless otherwise referenced, specific terms were derived from the definitions found in FTA Circular 4702.1B.

9. **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 discrimination based on race, color, or national origin.
10. **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.
11. **Disparate Treatment:** 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. **Disproportionate Burden:** 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.
13. **Federal Financial Assistance:**
 - a) Grants and loans of Federal funds.
 - b) The grant or donation of Federal property and interests in property.
 - c) The detail of Federal personnel.
 - d) 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.
 - e) Any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.
14. **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; a passenger ferry system; or for a bus rapid transit system.
15. **Fixed-Route:** A system in which buses follow a fixed time schedule over a prescribed route. It is different from such modes of transportation as taxicabs or demand-responsive transportation, where each trip may differ in its origin, destination, or schedule.
16. **Frequency:** As defined in the MARTA 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.
17. **Headway:** As defined in the MARTA 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.

18. **Land Use:** As defined in the MARTA Service Standards, this term refers to the purpose for which land or the structure on the land is being used, for example, residential, commercial, or light industry.
19. **Lifeline route:** A service designation ensures the retention of transit links originating from low-income and transit-dependent areas to destinations including public facilities and Major Activity Centers.
20. **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.
21. **Local:** As defined in the MARTA 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.
22. **Low-income Person:** A person whose median household income is at or below 150% the U.S. Department of Health and Human Services (HHS) poverty guidelines.
23. **Low-income Population:** 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.
24. **MAC:** The MARTA Accessibility Committee (MAC) is an advisory committee made up of citizens and advocacy agencies representing seniors and various disabilities in the MARTA service area. The committee meets to discuss and recommend solutions to transportation-related issues for both seniors and persons with disabilities including a cross-section of minority, low-income and LEP populations.
25. **Metropolitan Planning Organization (MPO):** The policy board of an organization created and designated to carry out the metropolitan transportation planning process.
26. **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.
27. **Minority persons include the following:**
 - a) 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.
 - b) 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.
 - c) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.

- d) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- e) 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.
28. **Minority Population:** 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, 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(s).
30. **National Origin:** The particular nation in which a person was born or where the person's parents or ancestors were born.
31. **Noncompliance:** 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:** 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 operated in lieu of fixed-route service with small vehicles in a geographical area that generates low levels of demand.
34. **Paratransit:** As defined in the MARTA Service Standards, this term refers to complementary paratransit service, provides origin-to-destination shuttle service for eligible MARTA customers.. Satisfies Americans with Disabilities Act (MARTA Mobility).
35. **Peak Period/Off Peak Period:** As defined and outlined in the MARTA 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 Only Bus:** routes provide longer-distance rapid transit service, with limited stops, that operate only during peak periods.

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 Service Standards, this term refers to a measure of bus route efficiency that takes into account a route's costs and its revenue, based on three factors: passengers per hour, average load, and total costs per passenger.
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. **RAC – Riders Advisory Council (RAC)** - The RAC is an all-volunteer group of twenty-four people from different backgrounds who live and work in the metropolitan Atlanta and are devoting their time and energy to make MARTA better, by providing advice and suggestions on MARTA policies, projects, and services.
43. **Recipient:** Any public or private entity that receives federal financial assistance from the FTA, whether directly from the 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.
44. **Regional:** 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.
45. **Ridership:** This term refers to the number of people making one-way trips on a public transportation system in a given time period.
46. **Route:** As defined in the MARTA Service Standards, this term refers to the geographical path followed by a vehicle or traveler from start to finish of a given trip.

47. **Route Spacing:** 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.
48. **Segments:** As defined in the MARTA Service Standards, this term refers to sections of routes delineated from others on the basis of such aspects as collection or delivery points or sections between these points.
49. **Service Area:** Either the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.
50. **Service Tier:** As defined in the MARTA Service Standards, this term refers to categories of transit service with distinct Service Standards that include MARTA Mobility, Supporting Local Bus, Frequent Local Bus, Peak Only, Limited Express, Streetcar, and Heavy Rail.
51. **Service Standards/Policy:** The established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.
52. **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 plan, metropolitan transportation plans, 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.
53. **Stop Spacing:** As defined in the MARTA Service Standards, this term refers to the distance between consecutive transit stops.
54. **Streetcar** – a tier of on-street rail service that provides frequent service on the downtown loop route.
55. **Sub-recipient:** An entity that receives federal financial assistance from the FTA through a primary recipient.
56. **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.
57. **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 the FTA.

58. **Traffic Analysis Zones (TAZ's):** As defined in the MARTA 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 Service Standards, this term refers to a rider's change from one transit route to another.
60. **Transit Amenity:** As outlined in the MARTA Service Standards, this term refers to features available to passengers on MARTA vehicles, and at the Authority's more than 9,000 bus stops, 12 streetcar stations, and 38 heavy rail stations.
61. **Transit Dependent Riders:** As defined in MARTA Service Standards, this term refers to Riders who either: (1) live in a household which have limited or no access to; or (2) who have a physical or mental disability that prevents the operation of a motor vehicle.
62. **Transit System:** This term refers to the facilities, equipment, personnel, and procedures needed to provide and maintain public transit service.
63. **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.
64. **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.
65. **Travel Time:** As defined in the MARTA 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.
66. **Trip:** As defined in the MARTA 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 unlink passenger trip to distinguish it from a round trip.

III. GENERAL TITLE VI PROGRAM REQUIREMENTS & GUIDELINES

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 the Federal Transit Administration (FTA) assistance programs. In compliance, MARTA filed a single certification annually with the 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 2022 which is located in The Transit Award Management System (TrAMS).

MARTA sub-recipients include 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 the FTA for the sub-recipient's compliance with all applicable federal laws, regulations, and directives, except to the extent that the 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*.

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 ensured 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 the Headquarters, Reduced Fare Office, Ride Stores and major stations.

**Notification to the Public of
RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT**
**Notificación al Público sobre sus
DERECHOS BAJO EL TÍTULO VI DE LA LEY DE DERECHOS CIVILES**

민권법 제6조의 권리에 대한 공시

Thông báo công chúng về Quyền theo Điều VI của Đạo luật Dân quyền
有关民权法案第六款所赋权利的公告

The Metropolitan Atlanta Rapid Transit Authority (MARTA) operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964. Individuals who need a language translator or written documents, in a language other than English, can call MARTA's Customer Service Office at: 404-848-5000 or contact MARTA's Office of Diversity and Equal Opportunity, 2424 Piedmont Road N.E., Atlanta, Georgia 30324.

For information on MARTA's civil rights program and the procedure to file a complaint contact 404-848-5000 (voice), 404-848-5665 (TTY) or visit MARTA Headquarters at: 2424 Piedmont Road, N.E., Atlanta, GA 30324. Complaints must be filed within 180 days of the alleged incident. Individuals also have the right to file a complaint directly with the U.S. Department of Transportation at: U.S. DOT, 1200 New Jersey Avenue, S.E., Washington, D.C., 20590, 202-366-4000 (voice) and/ or the Federal Transit Administration at: FTA Office of Civil Rights, 230 Peachtree, N.W., Suite 800, Atlanta, GA 30303, 404-865-5600 (voice). Information is also available on the MARTA website at: www.itsmarta.com.

La Autoridad del Transporte Rápido del Área Metropolitana de Atlanta (MARTA) provee sus programas y servicios sin tomar en consideración la raza, el color, o la nacionalidad de una persona; en acuerdo con el Título VI de la Ley de los Derechos Civiles de 1964. Las personas que necesiten un traductor o documentos escritos en un idioma que no sea el inglés pueden comunicarse con la oficina del Servicio de Atención al Cliente de MARTA al: 404-848-5000 o con la oficina de Diversidad e Igualdad de Oportunidades de MARTA: 2424 Piedmont Road N.E., Atlanta, Georgia 30324.

Para obtener más información sobre los programas de derechos civiles de MARTA y el procedimiento para presentar una queja, llame al 404-848-5000 (voz), 404-848-5665 (TTY), o puede visitar nuestra oficina localizada en: 2424 Piedmont Road, N.E., Atlanta, GA 30324. Usted tiene un periodo de 180 días después de haber ocurrido el incidente para presentar su queja. Las personas también cuentan con el derecho de presentar una queja directamente al Departamento de Transporte de los EE. UU. en: U.S. DOT, 1200 New Jersey Avenue, S.E., Washington, D.C., 20590, 202-366-4000 (voz) y/o la Administración Federal del Transporte en: FTA Office of Civil Rights, 230 Peachtree, N.W., Suite 800, Atlanta, GA 30303, 404-865-5600 (voz). Para más información sobre sus derechos bajo el Título VI de la Ley de Derechos Civiles, puede visitar nuestro sitio web: www.itsmarta.com.

애틀랜타 수도권 대중교통국 (MARTA)은 1964년도 제정 민권법 제 6 조에 따라 인종, 피부색 또는 출신국에 상관없이 그 프로그램과 서비스를 운영합니다. MARTA 이용에 관련된 종이서비스 또는 한국어 안내서가 필요하신 분은 MARTA 고객지원 서비스센터로 전화하시거나 (404-848-5000) MARTA 다양성평등사무국 (주소: 2424 Piedmont Road NE, Atlanta, Georgia 30324)으로 문의하십시오.

MARTA의 시민 평등권 프로그램 및 항의 제기에 대한 정보가 필요하시면 전화 404-848-5000 (음성), 404-848-5665 (TTY)로 문의하시거나 아래 주소의 MARTA 본사를 방문해 주십시오. 2424 Piedmont Road, N.E., Atlanta, GA 30324. 항의의 제기는 해당 사건 발생일로부터 180일 이내에 하셔야 합니다. 또한 각 개인은 미국 교통부/또는 연방 교통국에 직접 항의를 제기할 권리가 있습니다. 주소는 다음과 같습니다. 미국 교통부: U.S. DOT, 1200 New Jersey Avenue, S.E., Washington, D.C., 20590, 202-366-4000 (음성), 연방 교통국: FTA Office of Civil Rights, 230 Peachtree, N.W., Suite 800, Atlanta, GA 30303, 404-865-5600 (음성). MARTA 웹사이트에서도 자세한 정보를 보실 수 있습니다. www.itsmarta.com.

MARTA điều hành các chương trình và dịch vụ của cơ quan trên căn bản không phân biệt chủng tộc, màu da hoặc nguồn gốc quốc gia thể theo Điều VI của Đạo luật Dân quyền năm 1964. Những cá nhân nào cần biên dịch viên hoặc tài liệu văn bản bằng một ngôn ngữ khác ngoài tiếng Anh vui lòng liên lạc với Văn phòng Dịch vụ khách hàng của MARTA tại: 404-848-5000 hoặc liên lạc Văn phòng Văn phòng Đa dạng và cơ hội bình đẳng của MARTA, 2424 Piedmont Road NE, Atlanta, Georgia 30324.

Để biết thông tin về chương trình dân quyền của MARTA và thủ tục nộp đơn khiếu nại, vui lòng gọi số 404-848-5000 (tiếng nói), 404-848-5665 (TTY) hoặc đến Văn phòng trung ương của MARTA tại: 2424 Piedmont Road, N.E., Atlanta, GA 30324. Đơn khiếu nại phải được nộp trong vòng 180 ngày sau khi xảy ra sự việc. Cá nhân cũng có quyền nộp đơn khiếu nại trực tiếp với Bộ Giao thông Hoa Kỳ tại: U.S. DOT, 1200 New Jersey Avenue, S.E., Washington, D.C., 20590, 202-366-4000 (tiếng nói) và/hoặc Cơ quan quản trị giao thông liên bang tại: FTA Office of Civil Rights, 230 Peachtree, N.W., Suite 800, Atlanta, GA 30303, 404-865-5600 (tiếng nói). Thông tin còn được trình bày trên trang mạng của MARTA tại: www.itsmarta.com.

根据 1964 年民权法案第六款的规定, 亚特兰大都会区快速交通管理局 (MARTA) 所经营的项目和服务不会因乘客的种族、肤色或出身国而有所不同。需要语言或非英语文件翻译的人士可以联系 MARTA 的客户服务中心, 电话是: 404-848-5000, 或者 MARTA 的多元化及平等机会办公室 Office of Diversity and Equal Opportunity, 地址为 2424 Piedmont Road NE, Atlanta, Georgia 30324-3330。

若需了解 MARTA 的民权项目和投诉程序, 请联系 404-848-5000 (语音), 404-848-5665 (TTY) 或前往 MARTA 总部, 地址是: 2424 Piedmont Road, N.E., Atlanta, GA 30324。必须在被指控事件发生的 180 天内提出投诉。个人也有权直接向美国运输部提出投诉。地址是: U.S. DOT (1200 New Jersey Avenue, S.E., Washington, D.C. 20590, 202-366-4000 (语音) 和/或联邦公共交通管理局, 地址是: FTA Office of Civil Rights, 230 Peachtree, N.W., Suite 800, Atlanta, GA 30303, 404-865-5600 (语音)。也可通过 MARTA 网站获取信息, 网址是: www.itsmarta.com。

Title VI Complaint Procedures and Complaint Form (Exhibit 2)- 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 D&I's electronic database for individual resolution and trend analysis.

When the data is analyzed, if patterns are noted, D&I 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. As a result of the proactive measures taken to resolve customer concerns at the lowest level possible, filing of complaints that requires Title VI investigations, have been greatly decreased.



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.

Both the Title VI complaint procedures and the form are available to the public and posted on the MARTA website. <https://itsmarta.com/pdfs/Exhibit-5-Title-VI-Complaint-Procedure-and-Form-Update.pdf>

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, senior management 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 Inclusion, 2424 Piedmont Road, NE, Atlanta Georgia 30324-3330 or 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 1400, Atlanta, GA 30303.

Title VI Investigations, Complaints or Lawsuits - During this Plan update, MARTA did not have any Title VI Lawsuits and very few Title VI informal investigations or complaints (**Exhibit 3**).

Public Participation Plan and Outreach - MARTA supports, values, and promotes the inclusive public participation of minority, low-income and LEP populations. To expand public participation, MARTA works in close collaboration and partnership with other departments. To this end, the Department of 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 public.

MARTA Public Engagement as a Result of Covid-19

MARTA public engagement shifted since the onset of the COVID-19 pandemic in 2020. Our approach embraced virtual participation and digital engagement using a variety of platforms (e.g., Zoom, WebEx, Teams, social media, text messaging, email, and phone audio). As a result, we saw an increase in participation in public meetings and online engagement activities.

Virtual options allowed more residents and stakeholders to participate in meetings and workshops. Once community members were comfortable with the emerging technology, they appreciated the logistical benefits of signing on to virtual events.

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

- The Office of Government and Community Affairs is 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 Sales is responsible for creating all communications for daily riders, social media (Facebook, YouTube, and Twitter) and implementing strategic marketing initiatives.
- The Office of Communications establishes and maintains active working relationships with all relevant local, national, minority and industry-wide media 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 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.

MARTA has developed a Public Hearing Policy and Procedure to establish guidelines for conducting public hearings and outreach in relation to Title VI, minority, and low-income population groups (**Exhibit 4**). 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 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 formats (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. During the Plan period there were no fare changes. In connection to major service 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. These forums were structured such that electronic depictions of route modifications and deletions were displayed on a large screen that 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, DeKalb and Clayton Counties, 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 days, times and methods as outlined below and translated the notice of public hearings in English and Spanish **(Exhibit 5)**:

Public Hearing/Engagement Activities	Day(s)	Date(s)	Time(s)	Location(s)/Method
MARTA Pop-up Breeze Location	Thursday	June 13, 2019	10:00 AM - 2:00 PM	North DeKalb Senior Center
MARTA Pop-up Breeze Location	Thursday	June 20, 2019	10:00 AM - 2:00 PM	Louise Watley Library
MARTA Pop-up Breeze Location	Thursday	June 27, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	July 11, 2019	10:00 AM - 2:00 PM	Lou Walker Senior Center
MARTA Pop-up Breeze Location	Thursday	July 18, 2019	10:00 AM - 2:00 PM	Harriett G. Darnell Sr Multi-Purpose Center
MARTA Pop-up Breeze Location	Thursday	July 25, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	August 8, 2019	10:00 AM - 2:00 PM	Wesley Chapel - William C. Brown Library

MARTA Pop-up Breeze Location	Thursday	August 15, 2019	10:00 AM - 2:00 PM	Northwest Library at Scotts Crossing
MARTA Pop-up Breeze Location	Thursday	August 22, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	September 12, 2019	10:00 AM - 2:00 PM	Chamblee Library
Proposed Service Modifications - Effective for December 2019	Monday	September 16, 2019	6:00 PM	in-person Dekalb County Public Library
MARTA Pop-up Breeze Location	Thursday	September 19, 2019	10:00 AM - 2:00 PM	Roswell Neighborhood Senior Center
MARTA Pop-up Breeze Location	Thursday	September 26, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	October 10, 2019	10:00 AM - 2:00 PM	South DeKalb Senior Center
MARTA Pop-up Breeze Location	Thursday	October 17, 2019	10:00 AM - 2:00 PM	Dorothy C. Benson Multipurpose Center
MARTA Pop-up Breeze Location	Thursday	October 24, 2019	10:00 AM - 2:00 PM	Charley Griswell Senior Center
Mobility Town Hall 2019	Tuesday	October 29, 2019	6:00 PM	In-person MARTA Headquarters
MARTA Pop-up Breeze Location	Thursday	November 7, 2019	10:00 AM - 2:00 PM	Frank Bailey Senior Center
MARTA Pop-up Breeze Location	Thursday	November 14, 2019	10:00 AM - 2:00 PM	Decatur Library
MARTA Pop-up Breeze Location	Thursday	November 21, 2019	10:00 AM - 2:00 PM	Hapeville Neighborhood Senior Center
MARTA Pop-up Breeze Location	Thursday	December 12, 2019	10:00 AM - 2:00 PM	DeKalb/Atlanta Senior Center
MARTA Pop-up Breeze Location	Thursday	December 17, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	December 19, 2019	10:00 AM - 2:00 PM	Sandy Springs Library Branch
MARTA Pop-up Breeze Location	Thursday	January 16, 2020	2:30 PM - 6:30 PM	South Clayton Recreation Center

Proposed Service Modifications - Effective for April 2020	Tuesday	February 11, 2020	6:00 PM	in-person East Point City Annex
Proposed Service Modifications - Effective for April 2020	Saturday	February 15, 2020	11:00 AM	in-person Dekalb Chamblee Library
MARTA Pop-up Breeze Location	Thursday	February 20, 2020	10:00 AM - 2:00 PM	Lou Walker Senior Center
FY 21 Operating and Capital Budgets	Monday	May 18, 2020	11:00 AM	Virtual
FY 21 Operating and Capital Budgets	Tuesday	May 19, 2020	6:30 PM	Virtual
Clayton County Updates - Capital Project Activities	Wednesday	September 23, 2020	6:30 PM	Virtual (Zoom and phone access)
Clayton County Updates - Capital Project Activities Community Meeting	Saturday	September 26, 2020	12:00 PM	Virtual (Zoom and phone access)
Cleveland Ave/Metropolitan Pkwy - ART Project	Wednesday	November 18, 2020	6:30 PM	Virtual (Live itsmarta.com, Zoom & Audio)
Summerhill BRT Meeting	Thursday	November 19, 2020	6:30 PM	Virtual (Zoom and phone access)
Cleveland Ave/Metropolitan Pkwy-ART Project	Friday	November 20, 2020	10:30 AM	Virtual (Live itsmarta.com, Zoom & Audio)
Track Replacement Project - Major Rail Service Impacts - Canterbury	Thursday	January 28, 2021	6:30 PM	Virtual & street canvassing
Track Replacement Project - Major Rail Service Impacts - Canterbury	Saturday	January 30, 2021	11:00 AM	Virtual & street canvassing
Clayton Bus Rapid Transit	Thursday	April 15, 2021	6:30 PM	Virtual (3 ways to join)
Clayton Bus Rapid Transit	Saturday	April 17, 2021	11:00 AM	Virtual (3 ways to join)
Mobility Town Hall 2021	Thursday	April 22, 2021	6:30 PM	Virtual (2 ways to join)
Mobility Town Hall 2021	Saturday	April 24, 2021	1:00 PM	Virtual (2 ways to join)

Essential Services Plan - Notice of Service Reinstatement	Saturday	April 24, 2021	NA	Website, social media, TV
FY 22 Operating and Capital Budgets	Monday	May 10, 2021	11:00 AM	Virtual
FY 22 Operating and Capital Budgets	Tuesday	May 11, 2021	6:30 PM	Virtual
Streetcar East Extension Project - Public Meeting	Thursday	May 27, 2021	6:00 PM	Virtual
Public Hearing Proposed Service Modifications - Effective August 2021	Wednesday	June 9, 2021	7:00 PM	Virtual (Audio Access)
Campbellton Corridor Transit Project	Thursday	June 10, 2021	6:30 PM	Virtual (3 ways to join)
Public Hearing Proposed Service Modifications - Effective August 2022	Saturday	June 12, 2021	11:00 AM	Virtual (Audio Access)
Campbellton Corridor Transit Project - Pop-up Open House	Tuesday	July 27, 2021	9:00 AM - 5:00 PM	Fort McPherson LRA In-person
Campbellton Corridor Transit Project - Pop-up Open House	Wednesday	July 28, 2021	9:00 AM - 5:00 PM	Fort McPherson LRA In-person
Campbellton Corridor Transit Project - Pop-up Open House	Saturday	July 31, 2021	9:00 AM - 12:00 PM	Fort McPherson LRA In-person
Campbellton Corridor Transit Project	Saturday	August 21, 2021	10:00 - 2PM	In-person Andrew & Walter Young YMCA
Proposed Service Modifications - Effective December 18, 2021	Tuesday	September 14, 2021	6:00 PM	In-Person Flint River Community Center
Proposed Service Modifications - Effective December 18, 2021	Wednesday	September 15, 2021	11:00 AM	Virtual (3 ways)
Proposed Service Modifications - Effective December 18, 2021	Thursday	September 16, 2021	6:00 PM	In-person MARTA Headquarters
Bus Network Redesign	Tuesday	November 9, 2021	11:00 AM	In Person Andrew & Walker Young Family YMCA

Cleveland Ave/Metropolitan Pkwy - Transit Project	Friday	November 10, 2021	10:30 AM	Virtual (Live itsmarta.com, Zoom & Audio)
Bus Network Redesign	Thursday	November 11, 2021	6:00 PM	In- person Decatur Conference Center
Bus Network Redesign	Saturday	November 13, 2021	11:00 AM	In-person Stage Door Theatre
Bus Network Redesign	Thursday	December 2, 2021	11:00 AM	Virtual (Zoom & Audio)
Bus Network Redesign	Tuesday	December 7, 2021	6:00 PM	Virtual (Zoom & Audio)
Essential Services Plan - Notice of Service Reduction	Saturday	December 18, 2021	N/A	Website, social media, TV

Meaningful Access to LEP Persons - In keeping with the theme of expanded and non-conventional outreach efforts, D&I 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” which was published in the Federal Register, Volume 70, Number 239, December 14, 2005.

The MARTA LEP Plan is updated every five years (**Exhibit 6**). MARTA uses 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 the service area.

The 2021 LEP Plan includes an examination of prior experiences with LEP individuals. MARTA first examines its prior experiences with LEP individuals and then determines 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 MARTA's customer service telephone line.
- Visits to MARTA's headquarters.
- Access to your MARTA's website.
- Attendance at community meetings or public hearings hosted by MARTA; and
- Contact with MARTA's paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

MARTA obtains data in relation to LEP persons by contacting its customer service representatives, vehicle operators, station managers, and community outreach staff. During this contact, MARTA finds out if the staff person can 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 also reviews 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 Plan

The top spoken languages among the LEP population in the MARTA Service Area are Spanish (63,616 persons), Chinese, including Mandarin and Cantonese (9,681 persons), Vietnamese (9,304 persons), Korean (4,970 persons), and 'French, Haitian, or Cajun' (4,249 persons).

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; and 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 several 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 limited Language Resource Bank comprised of bilingual and multilingual 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.
- Rail and Bus system-wide announcements are made in English and Spanish.
- Audio Visual Information System (AVIS) - The AVIS Project upgraded the public address and electronic passenger information system at MARTA's 38 rail stations with enhanced audio and video displays. This project also expanded transit user access to communications and safety information. Enhanced features include multi-lingual digital signage and automated messaging that will more quickly provide communications to riders. Digital signs display bus schedules and train arrival information for connecting transit systems such as transfers from rail to bus or to other regional transit systems. The project cost \$42M and was completed in 2021.

Project Benefits:

- ADA Compliant Passenger Information System
- Real-Time Arrival Travel Information for MARTA Passengers Resulting in Potential Reduced Travel Times
- Enhanced Connectivity Between People and Centers of Employment, Education, and Community Services
- Multi-Lingual Signage and Audio Passenger Information for Non-English-Speaking Riders to Meet LEP Requirements – (Currently in Spanish only)

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 Spanish and other languages upon request and free of charge.
- MARTA Reference Guide for New Customers is available on the website and can be translated into Spanish, Korean, Chinese, French, German, and Vietnamese.
- 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

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 retained 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 200 languages

Police Service - MARTA Police personnel must be able to communicate with people from LEP populations. Therefore, the department has a language translation policy in place (General Order 81-102) to ensure communication with individuals who do not speak English at all or not very well. 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 Care Center - The Customer Care Center is comprised of the Customer Information Center and the Customer Service Center. The Customer Service Center is responsible for documenting, tracking, investigating, and providing responses to customer complaints or concerns including investigating Breeze Card fare dispute claims and capturing customer feedback comments, suggestions, recommendations, and commendations. The Customer Information Center provides bus and rail schedule information and trip itinerary planning services. Any formal complaint that may be Title VI related, is referred to D&I for review and response is comprised of MARTA's two call centers and facilitates language access services as needed:

The Customer Care Center uses the translation service to expand MARTA's ability to communicate with customers whose primary language is not English.

A contract with a translation interpreting service was established, 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 bilingual 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 needs 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; a request is 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.

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

- Public hearings, community meetings, 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.

Marketing and Sales - MARTA's Marketing and Sales Office works in partnership with D&I to create language access for the community and MARTA patrons who speak Spanish. As reflected in the Public Hearing Policy and Procedures and Community Outreach Procedures, flyers are used to announce public meetings and are placed on the MARTA website, in Rail Stations and various locations. Critical information is in English and Spanish and information advising individuals on how to obtain information in additional languages is also written on various publications. Further alternative language translation services for the MARTA website are available, through Google Translation, in multiple languages including Spanish, Korean, Chinese, Japanese, French and German.

Diversity and Inclusion (D&I) - D&I staff advise new employees of the process to access the language assistance services during their orientation period. D&I staff utilize available

bilingual staff whenever possible, to assist with requests from MARTA's LEP population. If not available and appropriate bilingual staff member is present, the D&I call-taker shall inform the LEP caller that he or she will be placed "on hold" and immediately transfer the LEP caller to extension 404-848-5290 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, Transit System Orientation Sessions for ALL MARTA mobility and reduced-fare customers – each day as required. In addition, upon request D&I, Reduced-Fare Office and MARTA Mobility, train seniors (65 and older) and individuals with disabilities who speak various languages. Education is provided on the following topics:

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

Highlights of Outreach Events and Initiatives - 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:

Neighborhood Planning Unit (NPU)² Outreach was conducted for:

- NPU – F
- NPU - G
- NPU - H
- NPU - I
- NPU - J
- NPU – K
- NPU - N
- NPU – P
- NPU – Q
- NPU - R
- NPU - S

² 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.

- NPU - T
- NPU - V
- NPU - W
- NPU - X

D&I also conducted cultural celebrations including:

- D&I utilized various social media and email to send cultural announcements and information.
- National Hispanic Heritage Month: In celebration, D&I showcased posters identifying Hispanics and their contributions.
- National Asian and Pacific American Heritage Month: In celebration, D&I showcased posters identifying Asian/Pacific Americans and their contributions.
- Black History Month: In celebration, D&I showcased posters identifying Black Americans and their contributions.
- Women’s History Month: In celebration, D&I showcased posters identifying women and their contributions and conducted programs for women owned businesses.
- Older Americans Month: Highlighted the services available to the Senior workforce and community as a whole
- Jewish American Heritage Month: In celebration, D&I showcased posters identifying Jewish Americans and their contributions.
- LGBT Pride Month: In celebration, D&I showcased posters recognizing the LGBTQ community and their contributions. MARTA highlighted LGBT Pride Month with visual displays in various Stations
- Caribbean American Heritage Month: In celebration, D&I showcased posters identifying Caribbean Americans and their contributions, and highlighted employees.
- Disability Pride Month: In celebration, D&I highlighted members of our MAC committee.
- Native American Heritage Month: In celebration, D&I showcased posters identifying Indigenous Americans and their contributions.
- Veterans Day: In celebration, D&I showcased posters recognizing Veterans for their contributions.
- At the suggestion of the GM, The D&I Office organized Inclusion Matters Workshops for Companies that do business with MARTA to encourage DBE participation.

Active community organization memberships include:

- Georgia Hispanic Chamber of Commerce
- Georgia Hispanic Construction Association
- NAAAP-Atlanta Chapter
- Japan American Society of Georgia
- National Black MBA Association – Atlanta Chapter

- Disability IN
- US Minority Contractors Association

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

- American Association for Access, Equity and Diversity
- Asian Indian Chamber of Commerce
- Atlanta Business League
- Atlanta Tribune
- Women's Transportation Seminar
- Who's Who in Asian American Communities
- The Equity Administrator was recognized by the Georgia Diversity Council in 2020 with the DisAbility Leadership Award
- D&I was recognized by the Georgia Hispanic Construction Association as the Government Partner of the year in 2021

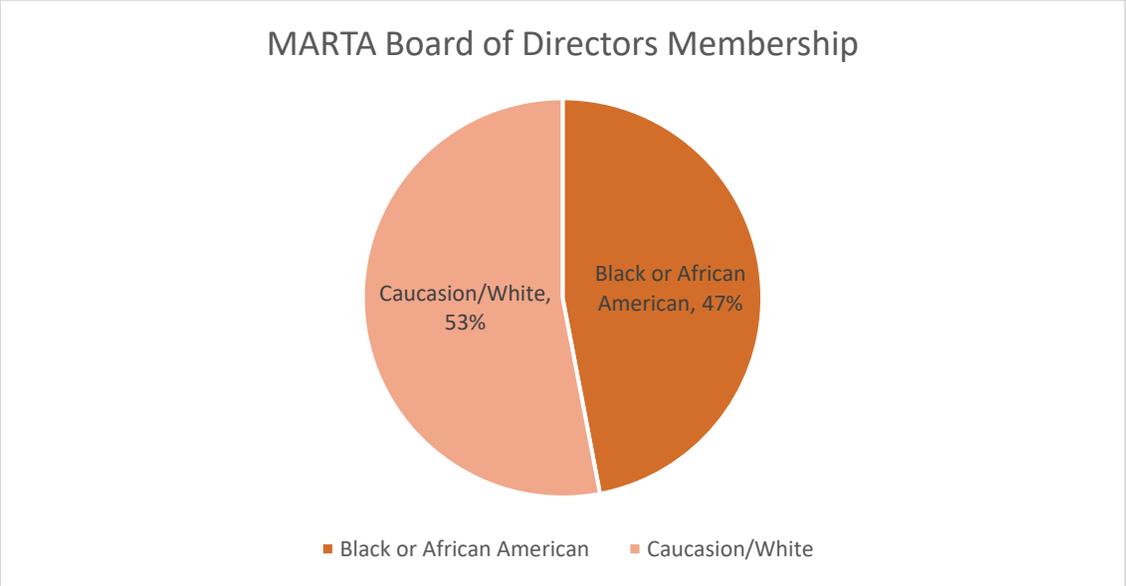
Human Resources – Recruiting Outreach:

Date	Event	Organization	Demographic
6/24/2021	38 th Annual Job Expo (Hybrid)	Latin American Association	Spanish Speaking
6/25/2019	37 th Annual Career Expo	Latin American Association	Spanish Speaking
6/26/2019	From Deployment to Employment, Hire Veterans with Disabilities	Department of Labor	Veterans with disabilities
6/27/2019	Georgia Voc. Rehab Job Fair	GA Voc. Rehab	Individuals w/disabilities
8/21/2019	Job Fair	Latin American Association	Spanish Speaking
9/20/2019	4 th Annual Refugee Employment Summit	Friends of Refugees	Refugees
6/24/2021	38 th Annual Job Expo (Hybrid)	Latin American Association	Spanish Speaking

10/23/2019	DisAbility Awareness Forum & Career Expo	DisAbility Link	Individuals w/disabilities
10/15/2021	DisAbility Link Annual Career Expo	DisAbility Link	Individuals w/disabilities

Minority Representation on Programming and Advisory Bodies

MARTA has a Board of Directors (the MARTA Board) **which is not selected by MARTA**. MARTA’s Board is composed of 15 members: 12 members representing the City of Atlanta, Fulton County, DeKalb County, and Clayton County; 2 members representing the Georgia Regional Transportation Authority and the Georgia Department of Transportation; and 1 member appointed by the Governor.



The MARTA Board meets regularly to address the latest issues of importance concerning ridership, safety, economics, new technology, government regulations, and more.

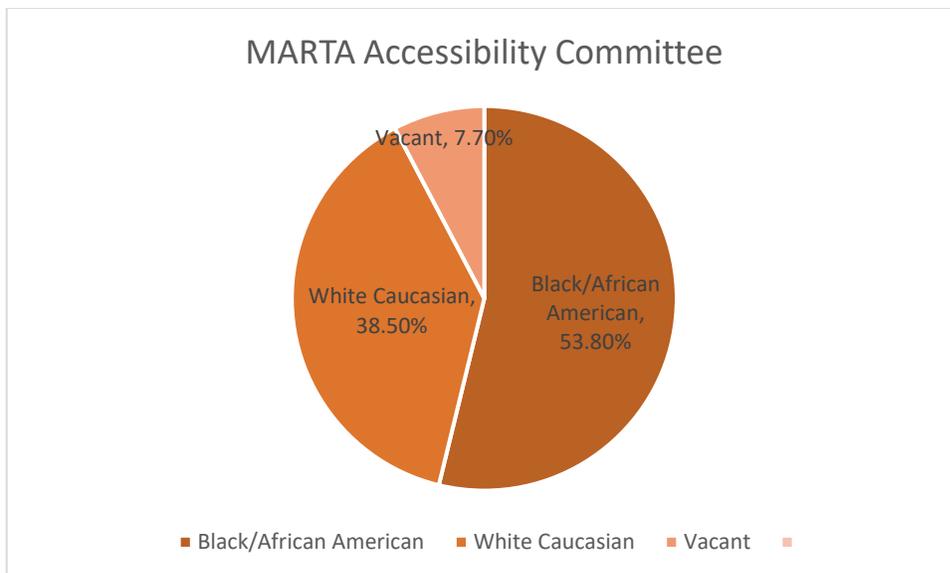
The Board of Directors holds five monthly standing committee meetings and a full Board meeting:

- Board Meeting
- Operations & Safety Committee
- Audit Committee
- Planning & Capital Programs
- Business Management Committee
- External Relations Committee

MARTA’s Accessibility Committee (MAC) is established to assist MARTA in better servicing the communities of seniors and persons with disabilities. MAC members act as a representative body for the citizens of Clayton, Fulton, DeKalb Counties and the City of Atlanta’s senior and persons with disabilities communities, serving in an advisory capacity to MARTA.

MAC membership consists of a Chairperson and 12 voting members. Six members are persons with disabilities and seniors who reside in the MARTA service area. The other six members are representatives from agencies that conduct business within the boundaries of services for seniors or people with disabilities within the MARTA service area. The racial breakdown of the MAC Committee as of this Plan year is as follows:

All members must reside in the MARTA service areas of Clayton, DeKalb and Fulton counties and the City of Atlanta, and/or be employed with organizations providing services in the MARTA service areas within Clayton, DeKalb and Fulton counties and the City of Atlanta. Vacancies are filled by placing vacancy announcements on MARTA’s website, as well as notifying ADA organizations



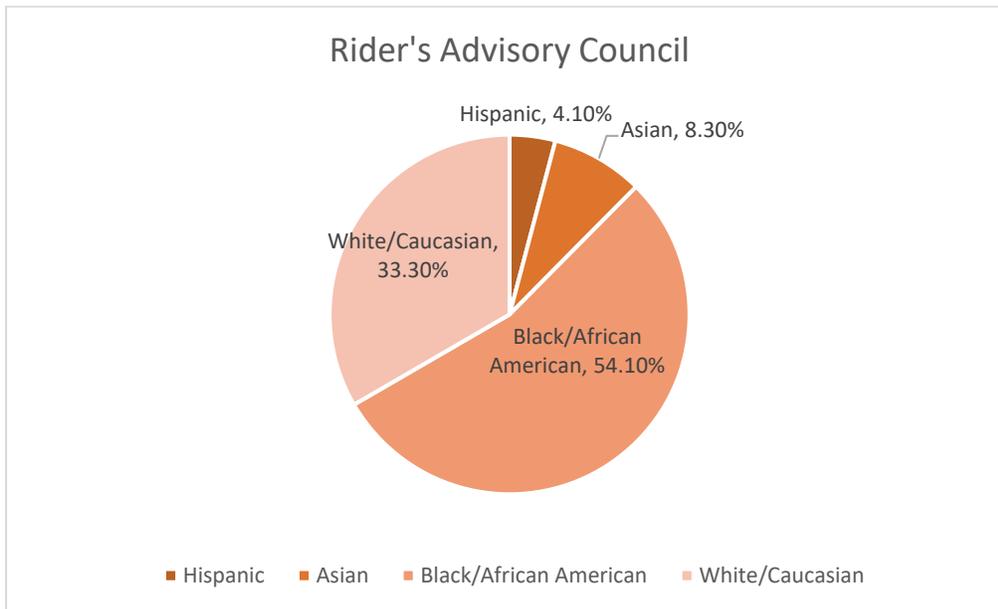
The Rider’s Advisory Committee (RAC) The RAC is an all-volunteer group of people from different backgrounds who live and work in Metropolitan Atlanta and devote their time and energy to make MARTA better. The RAC meets monthly to discuss and recommend solutions to transportation-related issues.

The RAC is a significant component of former MARTA GM/CEO Jeffrey Parker’s vision and long-term commitment to change how MARTA conducts business and makes the

agency more responsive to our customers. MARTA believes in giving customers a meaningful voice and actively listening to what they have to say.

An open application process was held for anyone interested in serving on the RAC. The finalists were selected based on ridership habits, commuting experiences, and community involvement. Some members are frequent MARTA riders; others are not. However, they all agree on the importance of having a first-class transit system for metro Atlanta.

There are 24 members, all of whom are serving two-year terms.



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 four sub-recipients: DeKalb and Cobb Counties, the United States Department of Agriculture (USDA), and the City of Sandy Springs.

DeKalb County adopted a Title VI Policy and Title VI Plan which, as MARTA verified, contained all of the FTA Title VI Program plan requirements. Cobb County, although a sub-recipient, is also a direct grant recipient that directly submits a Title VI Program to the FTA. At this time the DeKalb and Cobb County programs are completed, and Cobb's program is in the final stages of Grant closeout by MARTA.

The City of Sandy Springs sidewalk project is in the initial phase and United States Department of Agriculture (USDA) Fresh Market project was implemented in 2019 and concluded in 2021.

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 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 Title VI complaints against sub-recipients during this review period. To ensure ongoing compliance, MARTA 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 7A)**.
- Developing an initial and quarterly checklist to ensure and monitor sub-recipient compliance with Title VI **(Exhibits 7B)**.
- Conducting site visits for the sub-recipients that MARTA was required to monitor **(Exhibit C)**
- Requiring sub-recipients to attend a mandatory comprehensive compliance training on Title VI, Environmental Justice; EEO, ADA and DBE.

Determination of Site Locations, New Starts, or Facilities – MARTA conducted an Equity Analysis for the Clayton County Multipurpose Operations & Maintenance Facility (**Exhibit 8**). There was no disparate impact to populations covered by Title VI. The site was found not to have any significant environmental impacts. MARTA currently has no other fixed-guideway projects in stages of development where a service analysis is appropriate. All major MARTA expansion projects that could qualify for New Starts or Small Starts are currently in early stages of development. MARTA has not applied for New Starts or Small Starts funding for these projects at this time.

Environmental Justice - The Environmental Justice mandates found in FTA Circular 4702.1B, Chapter I, Part 6 and FTA Circular 4703.1, Chapter IV are followed by MARTA in relation to all 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.

Transportation Improvement Plan (TIP) - The Transportation Improvement Program is a listing of programmed projects, included in the long-range regional transportation plan, that have authorized funding. The window of the TIP is six years and includes projects submitted by the Georgia Department of Transportation (GDOT), the Georgia Regional Transportation Authority (GRTA) and governmental and community groups in the 13 counties forming the ARC Planning/Air Quality Non-Attainment area.

MARTA continues to encompass Environmental Justice principles in its planning efforts as the Authority takes an active approach improve transportation access and reliability. Examples of major projects are listed below:

- **Bus and Bus Facilities Program** – The Bus and Bus Facilities program provides capital funding to replace, rehabilitate and purchase buses and related equipment to construct bus-related facilities.
- **More MARTA** - A partnership between MARTA and the City of Atlanta funded by the half-penny sales tax passed in 2016. However, federal funds will be sought to advance and expand key projects. This initiative will expand accessibility, connectivity, and mobility in the City of Atlanta. It is comprised of many projects.

Public outreach was conducted in 2016. Ongoing public engagement was conducted in 2017 and 2018 as a project list was developed. The project list was approved by the MARTA Board of Directors October 4, 2018.

Although some projects will span several decades to develop and complete, the projects will include Arterial Rapid Transit (ART), Bus Rapid Transit (BRT), Light Rail Transit (LRT), station and service enhancements, more shelters and transit hubs. Major projects in current development stages include Summerhill BRT, Streetcar East Extension, Cleveland Avenue and Metropolitan Parkway ARTs, and Campbellton Road high-capacity transit are currently in the planning phase.

- **Clayton County Initiative** – The Clayton County initiative was undertaken by MARTA in 2016 to examine High-Capacity Transit (HCT) alternatives. MARTA has also initiated a Bus Operations and Maintenance Facility Study. Public outreach and input, along with data collection formed the basis for forming the study goals. In 2018 the MARTA Board, based on the HCT study, adopted a locally preferred alternative (LPA), a 22-mile commuter rail corridor, as advancement into the federal environmental review process. The Board also adopted corridors for BRT implementation along SR 85/SR 139. This project is prioritizing Downtown Jonesboro, mobility centers, and Park-and-Ride lots, as key destinations.
- **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. There are continued plans to improve Armour Yard, Avondale, Browns Mill, Hamilton, Laredo, and the Perry garage.

All bus and rail maintenance facilities are subject to the storm water permit and industrial wastewater permit requirements of the Clean Water Act, Georgia Environmental Protection Division (GA EPD), and local government requirements. 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.

Four of the seven operating MARTA maintenance facilities (Armour, Brady, Perry, Hamilton/Browns Mill) have City of Atlanta (CoA)-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.

D&I works closely with the Planning Department in reviewing and commenting on environmental justice assessments for construction projects and programs. The ongoing interface between D&I and Planning ensures continuity in the application of Title VI/Environmental Justice requirements during the conceptual, planning, and implementation phases of projects and programs.

IV. Fixed Route Transit Providers

System-wide Service Standards and Board approval - The FY 2022 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 9**). The recent Service Standard changes emphasizes on the service change process, updating language in the "Emergency Events" section to become more inclusive with present day issues, and condensing content to become more reader friendly.

Under the "Service Change Process", the Service Standards outline the nine steps necessary to implement changes in services. All steps include but are not limited to internal and external customer feedback, in which MARTA ensures contact information is equitably accessible for individuals that are visually or technologically challenged. During the process, MARTA conducts a Title VI analysis to better access community impacts and limit any partiality in service access.

Currently, 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.

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.

MARTA strives to maximize accessibility and reliability. During peak service, using a total of 406 buses, 2 street cars, and 128 rail cars, MARTA operates a rapid transit system within Fulton County, DeKalb County, Clayton 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 not to exceed 150% of seated capacity. The standard load factor for any service operating 10 or more miles per trip on limited-access highway is 100% of seated capacity.

Therefore, the maximum load factors are as follows:

- A 60-foot, 54 seat bus: 81 or more riders exceed the maximum load factor
- A 40-foot, 37 seat bus: 56 or more riders exceed the maximum load factor
- A 35-foot, 30 seat bus: 46 or more riders exceed the maximum load factor

- A 30-foot, 25 seat bus: 38 or more riders exceed the maximum load factor

If a bus exceeds this standard, it will be monitored. If the overload is documented for three consecutive days during the mark-up period at or above a 150% load factor (100% for any service operating 10 or more miles per trip on limited-access highway), corrective actions shall be taken to achieve balanced loading within acceptable limits of these standards. Corrective action may include increased frequency, supplemental “plug” service, adjustment, or trips before or after the effected trip 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 will maintain headways of 40 minutes or less. Weekday off-peak and weekend service will maintain headways of 60 minutes or less. Headways shall vary between peak periods and off-peak periods where demand dictates in order to minimize operating expenses and provide the most efficient service during weekday peak demand periods.

Headway by Period

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

The following factors will be examined when establishing and adjusting headways:

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

When developing schedules, pulse headways of 15, 30, 45, and 60-minute intervals will be maintained where practical. However, running times may be adjusted for known traffic conditions, wherever economically practical and feasible, within fiscal and contractual constraints. Consistent trip departure times and pulse headways will help to facilitate timed-transfers and better passenger connections with other bus routes.

Bus Span of Service Hours – Span of Service is defined as the hours that service will operate at any given point within the system. Certain commuter routes may be limited to morning and afternoon peak hour service only. The span of bus service varies by route

according to demand. Weekday service periods are identified as peak and off-peak and are defined as follows:

Peak

- Morning Peak 6:00 a.m. – 9:00 a.m.
- Afternoon Peak 3:00 p.m. – 7:00 p.m.

Off-Peak

- Early Morningbefore 6:00 a.m.
- Midday..... 9:00 a.m. – 3:00 p.m.
- Evening 7:00 p.m. – 9:00 p.m.
- Late Night.....after 9:00 p.m.

Weekend service is considered off-peak all day long with midday service levels operating between 6:00 a.m. and 7:30 p.m. for bus.

Most bus service is offered during morning peak, midday, afternoon peak, and evening service. Extension of service into the late night and early morning periods are justified by demand and monitored for effectiveness. Connectivity with rail service will be considered in the distribution of service provided in the late night and early morning periods.

The fixed-route bus service is comprised primarily of routes serving one or more rail stations. Particular attention is given to maintaining key linkages to the rail system during its hours of operation.

Modification to the span of service for a particular route will be considered when:

- The first or last hour of service show productivity greater than or less than the productivity of similar service during the same time period.
- Changes in employee shift time or work hours for major employers that produce an increase or decrease demand for service within the same route alignment.

Bus On-time Performance – On-Time Performance (OTP) is defined as buses departing 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 loads, 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 will determine the reason why it does not consistently meet standards and will take action to correct the problems. This may include adjusting running times, changing headways, etc.

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.

Calculation Method: 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 Automatic Vehicle Location (AVL) system and multiplying the result by 100. Note that 30 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 falls below the target rate of 78.5%, it will be flagged and subject to review. Upon identification of causes for substandard on-time performance, actions will be developed and implemented as resources permit. These actions generally include adjustments to headways and/or running times.

Bus Route Productivity – Route Productivity is based on current ridership information and performance measures. Ridership information that is reported on a tri-annual basis will be used to calculate productivity by route for weekday, Saturday, and Sunday service. Route productivity standards dictate the minimum productivity a route must maintain. The standards for evaluating portions of routes are intended for use in identifying needed service improvements, for making modifications to specific portions of existing routes, or for identifying low productivity segments of routes. These standards could be 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 may also be used to evaluate proposals for new route extensions or deviations on existing routes.

The productivity standards established for bus service are delineated into eight service tiers to ensure service evaluation is equitable. Depending on service performance, a route could fall near one of the three categories listed below:

- 50% below the tier average
- Performing at tier average
- 50% above the tier average

Performance thresholds for these standards are determined by a Bus Productivity formula that requires specific tier value, tier minimums, and tier maximums. Through this process each route would receive an indexed value that would then be compared to other similar routes.

Bus Stop Spacing – Bus Stop Spacing guidelines are based on land use characteristics and population densities. Efficient bus stop placement will balance the need to minimize travel time for transit vehicles with the need to minimize walk distances to bus stops for

transit riders. The following areas will be evaluated in determining bus stop locations: safety, convenience, ridership, spacing to other stops, accessibility for people with mobility impairments who use wheelchairs or other mobility aid devices and other special considerations.

Based on land use characteristics and street connectivity, MARTA aims to place stops in a range of 800 to 1,200 feet whenever possible. This range typically represents a spacing of no less than two city blocks at the minimum and a maximum of nearly a quarter mile, which is MARTA's transit access standard (walking distance).

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 will survey proposed site locations to ensure that bus stops offer the maximum possible safety and convenience for boarding and alighting customers.

Vehicle Assignment/Distribution for Buses – Vehicle Distribution will be equitable throughout the system at the divisional level between garages and during daily vehicle assignment. Factors that must be considered include fuel type, availability by division, peak vehicle requirement by division and maintenance capabilities by division.

Vehicles shall be equitably distributed throughout the service area. This includes vehicle assignment to each garage and among service provided from each garage.

MARTA's Bus Fleet Management Plan functions to maintain the average fleet age distributed across the divisions.

Specific equipment will be assigned to a given route based on load factor and capacity requirements. At non-CNG equipment bus facilities, diesel buses will operate the service.

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.

The Department of Heavy 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%. The seated capacity for a single rail car is 64. Applying the load factor to a six-car consist, the maximum allowable load will be 576 passengers, with 384 seated.

Rail load factors shall not exceed 150% during all hours, except between Peachtree Center and Five Points Station where it shall 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-car consists is 653 and 870, respectively.

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 will be performed annually to measure maximum rail car volume for weekday, Saturday, and Sunday service, as well as various stations upon request. Other sources of passenger activity such as station entries and exits can be used to complement the manual point checks to monitor and evaluate load factors.

Upon confirmation through investigation, if the load factor consistently exceeds 150%, corrective action shall be considered to achieve balanced loading within acceptable limits of these standards. Actions include an increase in train consist size or an increase in

service frequency. Consistently exceeding the maximum load factor shall be determined through random checks of ridership over a period of sixty days excluding events, such as conventions and other special proceedings.

MARTA's Rail Fleet Management Plan functions to provide a description of the projected rail car fleet requirements of MARTA over a ten-year period. These projected rail car fleet requirements are based on forecasted ridership expected to occur in the peak direction at the maximum load point on the North-South and East-West Lines.

Rail Headways – Heavy Rail Headway is defined as the interval of the time between trains traveling in any given direction of travel. Weekday peak hour rail headway will be less than or equal to 10 minutes on all lines, while weekday off-peak headway will be between 12 and 20 minutes on all lines. Weekend and holiday headways will operate every 12-20 minutes on all lines.

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

Headway by Period

- Weekday early morning: 15- 20 Minutes (7.5 - 10 Minutes on Trunks)
- Weekday morning/afternoon peak: 10 Minutes (5 Minutes on Trunks)
- Weekday midday: 10 - 15 Minutes (5 - 7.5 Minutes on Trunks)
- Weekday evening: 15 - 20 Minutes (7.5 - 10 Minutes on Trunks)
- Weekday/Weekend late night: 15 - 20 Minutes each line (Red Line from Lindbergh Center to North Springs)
- Weekends: 15 - 20 Minutes (7.5 – 10 Minutes on Trunks)

“Trunks” are defined as the segments of service that overlap between two or more rail services (i.e., North-South service between Lindbergh Center Station and Airport Station and East-West service between Ashby Station and Edgewood-Candler Park Station), resulting in improved headway benefit.

The following factors will be considered when adjusting rail headways:

- Load Factor – Assessed annually
- The number of rail cars available – Assessed monthly (average = 244)
- Passenger Demand – Assessed bi-annually or as necessary
- On-Time Performance – Assessed monthly (average = 97.5%)

Rail Span of Service Hours – Span of Service is defined as the hours that service will operate at any given point within the system. Rail service is maintained for a span of up to 21 hours, seven days per week giving considerations to service demand and maintenance requirements. Certain commuter routes may be limited to morning and afternoon peak hour service only while rail service is maintained for a span of up to 21 hours.

Weekday service periods are identified as peak and off-peak and are defined as follows:

Peak

- Morning Peak 6:00 a.m. – 9:00 a.m.
- Afternoon Peak 3:00 p.m. – 7:00 p.m.

Off-Peak

- Early Morningbefore 6:00 a.m.
- Midday..... 9:00 a.m. – 3:00 p.m.
- Evening 7:00 p.m. – 9:00 p.m.
- Late Night.....after 9:00 p.m.

Weekend service is considered off-peak all day long with consistent headways operating throughout the service day subject to rail maintenance.

The fixed-route bus service is comprised primarily of routes serving one or more rail stations. Particular attention is given to maintaining key linkages to the rail system during its hours of operation. Modifications to the rail schedule require changes in the hours for core routes to maintain connectivity between the modes.

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 ½-mile pedestrian or wheelchair travel distance of any given rail station during all hours of service.

Vehicle Assignment for Rail – Vehicle Distribution is equitable throughout the system at the divisional level between garages and during daily vehicle assignment. Vehicles shall be equitably distributed throughout the service area. This includes vehicle assignment to each rail yard and among service provided from each rail yard.

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 Department of Light Rail Operations:

In 2018 the ownership and operation of the Atlanta Streetcar was transferred from the City of Atlanta to MARTA. This transfer has increased the types of service provided by MARTA and expanded service and connectivity within the City of Atlanta.

Streetcar Load Factor- Streetcar Load Factor is defined as the ratio of passengers on the streetcar to the number of seats available.

- The maximum load factor during all hours of service is 150%.
- The maximum allowable load will be 90 passengers, with 60 seated.

If a streetcar exceeds this standard, it will be monitored. If the overload is documented repeatedly during the mark-up period at or above a 150% load factor, corrective actions may be taken to achieve balanced loading within acceptable limits of these standards.

Streetcar Headway - Streetcar service now follows a set schedule that starts and ends at Centennial Olympic Park. The looped alignment currently serves 12 stop locations that connects to Peachtree Center, Georgia State University, the Sweet Auburn Curb Market, and more.

Streetcar Span of Service Hours - Streetcar span of service hours is consistent seven days a week as seen below:

- Sunday through Saturday – 8:15 a.m. to 11:00 p.m.

Streetcar Transit Access - Streetcar service is considered accessible within a half (0.5)-mile pedestrian or wheelchair travel distance of any given streetcar station during all hours of service.

Vehicle Distribution for Streetcar - There are four streetcar vehicles, two are used at a time to maintain the 10–15-minute headway. The usage of these vehicles is rotated and allows for up to two vehicles to be out of service without disrupting service.

Transit Service Monitoring Results - For both bus and rail modes, annual reviews, including MARTA Board approval of the Service Standards and Board approval of major service changes/modifications, 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 achieve 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 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.

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TITLE VI SERVICE MONITORING ANALYSIS

2021 Title VI Plan



Metropolitan Atlanta Rapid Transit Authority

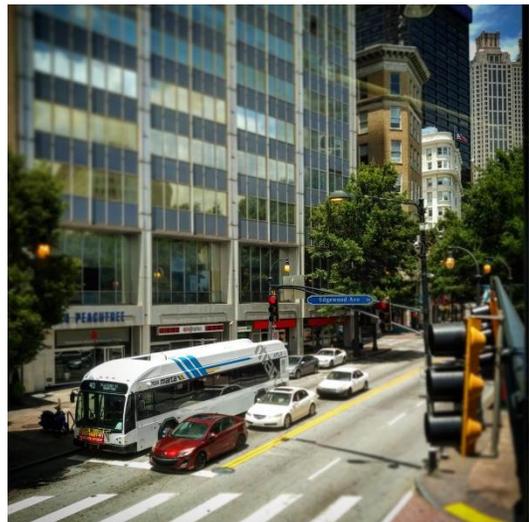


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Executive Summary

1. Overview

MARTA is responsible for providing transit services and access to its facilities without regard to race, color, or national origin as required by Title VI of the Civil Rights Act of 1964. Likewise, MARTA is responsible for providing these services and access without regard to income under Executive Order 12898, signed into law by President Bill Clinton in 1994. Accordingly, MARTA's goal is to ensure equity in how its services are provided to all individuals regardless of race or income level.

MARTA follows regulatory guidance provided in FTA Circular 4702.1B – Title VI Requirements and Guidelines for Federal Transit Administration Recipients. Chapter IV, Requirements and Guidelines for Fixed-Route Transit Providers provides specific service monitoring requirements in Section 6 – Requirement to Monitor Transit Service.

As required by Section 6, MARTA sets quantitative service standards and policies on an annual basis. These Board-adopted service standards guide MARTA's planning and operational decisions, protecting against discriminatory practices. At least every three years, these standards and policies should be analyzed and monitored to ensure that service quality is equitable when comparing minority and non-minority routes, as well as low-income and non-low-income routes.

Accordingly, monitoring of the following standards is addressed in this report:

- Vehicle load factors (vehicle load)
- Vehicle headways
- On-time performance
- Transit access (service availability)

In addition, two service policies are addressed in this report:

- Transit amenities
- Vehicle distribution

MARTA conducted analysis on the four standards to identify any violations of the standards. Additional information is provided for the service policies, including a demographic analysis of MARTA's transit amenities. These analyses were completed using demographic data from the U.S. Census American Community Survey in combination with MARTA system data derived from geographic information systems (GIS) databases, and data collected by the automated fare collection (AFC), automated passenger counting (APC) and vehicle location (AVL) systems.

2. Results

Results of the analysis are summarized below.

Standard	
Load Factors (Vehicle Load)	No violations of the load factor standard were observed for any minority or low-income routes or rail lines.
Headways	No violations of the headway standard were found for any minority or low-income routes or rail lines. No low-income or minority route exceeded the 60-minute headway standard.
On-Time Performance	All four bus route groups – minority, non-minority, low-income, and non-low-income – met the on-time performance standard. Minority and low-income route groups performed slightly better than non-minority and non-low-income route groups. Minority rail lines performed better than non-minority lines, and all rail lines were low-income.
Transit Access (Service Availability)	Minority and low-income residents within MARTA’s transit access area (within 1/4-mile of bus routes and 1/2-mile of rail stations) are slightly over-represented compared to the entire 3-county MARTA service area population.

Information about the two included service policies is summarized below.

Policy	
Transit Amenities	<p>All buses offer identical amenities across the bus fleet. Trains offer identical amenities across the rail fleet, and rail stations offer identical amenities across the entire rail system.</p> <p>Bus stop amenities are located based on ridership, service, equity, and land use factors, and are more commonly located in minority and low-income areas. MARTA is working aggressively to increase the number of bus stop amenities and has relaxed its criteria to allow more flexibility in minority and low-income placement.</p>

Vehicle
Assignment

Buses of various types are assigned at the divisional level (by garage), considering fuel type, availability, peak vehicle requirement, and maintenance capabilities. All rail vehicles are the same type.

Data & Definitions

Geographic information systems (GIS) and statistical analyses were conducted using a combination of MARTA's in-house system data and demographic data from the US Census. Block group level datasets were obtained from the American Community Survey (ACS) 5-year estimates, 2015 – 2019 edition. Census data sources included:

- Table C02003 – Detailed Race
- Table C17002 – Ratio of Income to Poverty Level in the Past 12 Months

In addition, MARTA's rail lines, bus routes, stations, and stops were represented by system data from MARTA's GIS and bus stop databases. Loads, on-time performance, and other data were obtained by MARTA's data collection and monitoring systems, including automatic passenger counters (APC), automated fare collection (AFC) and automatic vehicle location (AVL) systems. All data represented service operated in the April 2021 Mark up (April 24th – August 13th, 2021).

3. Defining Minorities and Minority Routes

MARTA used FTA's definitions for minority populations. Minorities are individuals who self-identify as African American or Black, American Indian/Alaskan Native, Asian, Hispanic, or Latino, or Native Hawaiian/Pacific Islander as reported in Table C02003.

Minority areas were identified through a GIS analysis, and consist of block groups where the percentage of minority residents exceeded the percentage of minority residents in MARTA's overall service area (63%).

Minority routes were identified using the methodology provided in Circular 4702.1B. A one-quarter mile buffer was calculated for each bus route, and a one-half mile buffer was calculated around each station on each rail line. If one-third of the area around a bus route or one-third of the area served by stations on a rail line was in minority areas, the bus route or rail line was designated a minority route.

For the time period analyzed, MARTA operated 111 fixed bus routes. Based on MARTA's analysis, the system had 74 minority bus routes and 37 non-minority bus routes, and all four rail lines, the EW (Blue and Green) and the NS (Red and Gold), were minority routes.

4. Defining Low-Income

MARTA used FTA's guidance to define low-income populations. For this analysis, low-income individuals are those who self-identify as having a median family income at or below 150% of the U.S. Census Bureau's poverty threshold as reported in Table C17002. The U.S. Census Bureau's poverty threshold was used because it defines and quantifies poverty in more detail than the Department of Health & Human Services (HHS) poverty guideline and considers the number and age of members in each family unit.

Low-income areas were identified through a GIS analysis, and consisted of block groups where the percentage of low-income residents exceeded the percentage of low-income residents in MARTA's overall service area (24.33%).

Low-income routes were identified using the methodology provided in Circular 4702.1B. A one-quarter mile buffer was calculated for each bus route, and a one-half mile buffer was calculated around each station on each rail line. If one-third of the mileage of a bus route or one-third of the area served by stations on a rail line was in low-income areas, the bus route or rail line was designated a low-income route.

For the time period analyzed, MARTA operated 111 fixed bus routes. Based on MARTA's analysis, the system had 82 low-income bus routes and 29 non-low-income bus routes. All four rail lines are low-income routes.

As all rail lines are low-income routes, it is not possible to compare low-income and non-low-income routes for the rail mode.

Technical Analysis

5. Load Factors (Vehicle Load)

Standards for vehicle load factors, which express the percentage of passengers on transit vehicles compared to the number of seats, are contained in MARTA's annually-update Service Standards. A load factor above 100% indicates that not all passengers may be seated.

Bus

For fixed-route buses, the standard load factor is 150%. If a route operates 10 or more miles per trip on limited-access highways, this standard is reduced to 100%. These standards apply at all hours of service. This standard does not take into consideration seats that are displaced by wheelchairs, strollers, or other large items.

MARTA's bus fleet consists of four different types and lengths of buses, which are each assigned to specific routes. Seated capacity varies by type/length of bus as follows:

Table 1: Bus Seating Capacities and Load Factors by Type/Length

Bus Type/Length	Seats	Max Load Factor
60-foot	54	80
40-foot	37	54
35-foot	30	45
30-foot	25	36

As an example, applying the load factor to a route utilizing a 40-foot bus that does not operate on limited-access highways, the maximum acceptable load would be 57 passengers, with 37 seated. If the route operates 10 or more miles on limited-access highways, the maximum acceptable load would be 37 passengers.

Data from MARTA's automatic passenger counter (APC) system were used to analyze bus load factors, using a dataset representing weekday service for the April - August 2021 mark-up period. Max loads were identified for every trip operated by every bus route and correlated to the vehicle type assigned to each route in order to identify any overloaded trips.

Heavy Rail

For heavy rail, the maximum load factor during all hours of service is 150%. Seated capacity for a single MARTA heavy rail car is 64. An exception is made for the one-station segment between Peachtree Center and Five Points Station, where the maximum

load factor is 170%. MARTA operates six-car trains on the Red, Gold, and Blue lines, and two-car trains on the Green Line.

Table 2: Heavy Rail Seating Capacities and Load Factors by Type/Length

Train Length	Seats	Max Load Factor
6 cars	384	576
2 cars	128	192

AFC data on the rail system was used to analyze rail load factors. Loads were modeled using individual level origin and destination pairs for every trip during the April 2021 mark up period. Passenger counts were aggregated at every station at 8-minute increments to approximate actual car loads and the average time and location of maximum loads for the period were identified.

Results

No violations of the load factor standard were observed for any trips on minority or non-minority bus routes

There were no violations of the load factor standard observed on any heavy rail line.

Table 3: Observed Trips with Overloads

Mode	Trips on Minority Routes	Trips on Non-Minority Routes	Trips on Low-Income Routes	Trips on Non-Low-Income Routes
Bus	0.0%	0.0%	0.0%	0.0%
Rail	0.0%	0.0%	0.0%	0.0%

6. Headways

Standards for headways, the time interval between vehicles traveling in the same direction along a bus route or rail line, are contained in MARTA’s annually updated Service Standards. Factors considered when establishing or adjusting headways include load factors, bus or rail car availability, passenger demand, on-time performance, route length and running time, and ridership.

Bus

For fixed-route buses, MARTA headway standards depend on the type of service with a maximum headway of 60 minutes for peak and off-peak service.

Data for MARTA’s bus schedules from the mark-up period of April – August 2021 were analyzed to identify any violations of the headway standard.

Heavy Rail

For heavy rail, MARTA standards for weekday headways on all lines will be less than or equal to 10 minutes during peak times and 20 minutes during off-peak times. Weekend and holiday headways on all lines will be a maximum of 20 minutes.

Data for MARTA’s rail schedules from April 2021 mark up were analyzed to identify any violations of the headway standard.

Results

No violations of the headway standards were found on minority bus routes. The only violation of the headway standard was on Route 148 Mount Vernon Highway, a non-minority/ non-low income route, with 70 minutes headway peak only weekday service was during weekday peak. Actions to reduce this headway would require additional resources (an additional bus) and due to underutilization of current services, an increase of service frequency would not be warranted. No corrective actions are merited at this time.

There were no violations of the peak headway standard on any rail line.

Table 4: Bus Routes and Rail Lines Meeting Peak Headway Standards

Mode	Minority Routes	Non-Minority Routes	Low-Income Routes	Non-Low-Income Routes
Bus	100%	99.09%	100%	99.09%
Rail	100%	NA	100%	NA

There were no violations of the off-peak or weekend/holiday headway standards on any bus route or rail line.

Table 5: Bus Routes and Rail Lines Meeting Off-Peak and Weekend/Holiday Headway Standards

Mode	Minority Routes	Non-Minority Routes	Low-Income Routes	Non-Low-Income Routes
Bus	100%	100%	100%	100%
Rail	100%	100%	100%	100%

7. On-Time Performance

Standards for on-time performance, the minimum expectation of schedule service considered to be “on-time,” are contained in MARTA’s annually updated Service Standards. On-time performance reflects both the predictability and reliability of service.

Bus

For fixed-route buses, on-time performance refers to buses departing published time points “on time.” To be “on time,” a bus must be no more than five minutes late and zero minutes early. This definition is applied through MARTA’s Schedule Adherence Standard, which determines how often buses serve published time points on each route on-time. For a route to comply with the standard, 78.5% of all departures from time points on the route must be on-time.

Data from MARTA’s automatic vehicle location (AVL) system were used to analyze bus on-time performance, using a dataset representing weekday service from the April 2021 mark up. By looking at the percentage of on-time, late, and early trips, it was determined if each route met the Schedule Adherence Standard. On-time performance results for minority and low-income routes were aggregated and compared to non-minority and non-low-income routes.

Heavy Rail

For heavy rail, on-time performance is measured from scheduled departure to arrivals at terminal points. To be “on time,” a train must depart from and arrive at its terminal stations within 5 minutes of the scheduled times.

Data from MARTA’s Occurrence Reporting Information System (ORIS), which tracks heavy rail on-time performance, were used to assess on-time performance for the months of the April 2021 mark up. ORIS reports on-time performance by line group

based on lines that share long trunk segments (North/South service operated by the Red and Gold Lines, and East/West service operated by the Blue and Green Lines) rather than distinguishing by individual color-coded lines.

Results

For bus on-time performance, all four route groups - minority, non-minority, low-income, and non-low-income – collectively met the schedule adherence standard of 78.5%. 92.79% of minority bus routes, and 98.20% of non-minority bus routes met the Schedule Adherence standard. Similarly, 93.69% of low-income bus routes and 97.30% of non-low-income bus routes met the schedule adherence standard.

All rail lines were classified as minority and low-income lines. To be in compliance with MARTA’s service standards, 95% of trains must depart terminal stations within 5 minutes of the scheduled departure time. However, all lines operated with a high level of on-time performance, averaging 97.66% for the mark up period

Table 6: Bus and Rail Routes Meeting On-Time Performance Standards

Mode	Minority Routes	Non-Minority Routes	Low-Income Routes	Non-Low-Income Routes
Bus	92.79%	98.20%	93.69%	97.30%
Rail	100%	N/A	100%	N/A

8. Transit Access (Service Availability)

Standards for transit access, a measure of how accessible MARTA’s service is nearby populations, are contained in MARTA’s annually updated Service Standards. Transit access indicates the distribution of routes within MARTA’s service area.

Bus

For fixed-route buses, the transit access standard is one quarter-mile pedestrian or wheelchair travel distance. Exceptions may be considered for the following factors:

- Geographical barriers and street network restrictions
- Service alignments that are designed to service areas of higher demand, or higher densities
- Outlying areas on the edge of MARTA’s service coverage may have up to one-half mile pedestrian or wheelchair travel distance

Data from MARTA’s geographic information systems (GIS) databases and the US Census were used to analyze transit access. MARTA staff used American Community Survey (ACS) data 5-year estimates (2015 – 2019) for demographic inputs. Through a

GIS analysis, a one-quarter mile buffer was calculated around MARTA bus stops, and minority and low-income populations were calculated as a percentage of the total population within this buffer. Results for minority/non-minority and low-income/non-low-income route groups were then compared to identify any disparate impacts or disproportionate burdens.

Heavy Rail

For heavy rail, the transit access standard is one half-mile pedestrian or wheelchair travel distance from heavy rail stations.

Data from MARTA’s geographic information systems (GIS) databases and the US Census were used to analyze transit access. MARTA staff used American Community Survey (ACS) data 5-year estimates (2015 – 2019) for demographic inputs. Through a GIS analysis, a one-half mile buffer was calculated around MARTA heavy rail stations, and minority and low-income populations were calculated as a percentage of the total population within this buffer. Results for minority/non-minority and low-income/non-low-income route groups were then compared to identify any disparate impacts or disproportionate burdens.

Results

The analysis was conducted using a combined bus and rail transit access area. Because MARTA’s system is designed to integrate bus and rail service, allowing free transfers between both modes and highly integrated route designs, staff felt this more accurately reflected passenger usage of the system.

The analysis found that 65.22% of the population with bus access and 53.72% of population with rail access are composed of minority residents. The overall percentage of minorities across MARTA’s entire 3-county service area is 62.98%. 30.20% of the population with bus access and 23.86% of the population with rail access is composed of low-income residents. The overall percentage of low-income residents across the entire 3-county service area (24.33%).

Table 7: Transit Access (Service Availability)

Mode	Minority	Non-Minority	Low-Income	Non-Low-Income
Bus	65.22%	34.78%	30.20%	69.8%
Rail	53.72%	46.28%	23.86%	76.14%
Total	64.78%	35.12%	28.36%	71.64%

9. Transit Amenities

Bus

All MARTA buses are low-floor, and equipped with the following amenities:

- Bike racks capable of holding two bikes
- Automated announcement systems that provide audio and visual announcements identifying routes, stops, and intersections
- Fare boxes for paying fares and processing cash or Breeze card transactions
- Wi-fi that allows riders to browse the web, send e-mails, and connect to social media sites

At minimum, all MARTA bus stops are marked with a MARTA bus stop sign, as well as contact information for customer service and bus schedule information. Bus stop locations that meet specific criteria may be prioritized for installation of amenities such as benches or shelters.

Riders can provide input for shelter placement by contacting Customer Service. MARTA reviews shelter placement to ensure equitable distribution throughout the service area. In addition to equity, MARTA prioritizes shelter placement by considering the following factors for urban, suburban, and rural areas:

- Ridership
 - Span of Service
 - Trip frequency
 - Title VI compliance
 - Local land use

In addition to meeting the prioritization criteria identified above, proposed amenity locations must meet the following conditions determined by site evaluation:

- Be able to accommodate a concrete pad.
- Be ADA-compliant and wheelchair accessible.
- Not be next to a guardrail, barrier, or fire hydrant.
- Not block vehicular traffic.
- Comply with all other requirements determined by the local jurisdiction, including local ordinances and design guidelines.

Known exceptions to these guidelines exist in several cities within MARTA's service area, where bus stop amenities have been installed at locations chosen by local

governments, Community Improvement Districts (CIDs), and other third parties as desired without consideration of MARTA's criteria. Known third parties include (but are not limited to) the Cities of Alpharetta, Hapeville, Roswell, and Sandy Springs, along with the Tucker Civic Association. Other third parties, such as developers, business owners, and neighborhood associations may also install bus stop amenities. MARTA has a process to engage these third parties whenever possible to stay aware of their bus shelter projects and ensure that safety and accessibility factors (particularly ADA compliance) are addressed by the third party.

Data from MARTA's geographic information systems (GIS) databases and the US Census were used to analyze transit amenities. MARTA staff used American Community Survey (ACS) data 5-year estimates (2015 – 2021) for demographic inputs. Through a GIS analysis, bus stops with amenities (shelters or benches) in minority and low-income areas were calculated as a percentage of the total number of stops with amenities (shelters and benches). Results for minority/non-minority and low-income/non-low-income stops were then compared.

Heavy Rail

In addition to Breeze Card vending machines, emergency phones, seating areas with benches and trash receptacles, all rail stations are equipped with the following amenities:

- Train Arrival Information – Electronic displays providing estimated train arrival times
- System Map and Passenger Information – Along with system maps, Heavy Rail stations include bus schedule information for routes serving the station.
 - Level Boarding Platforms – Allowing level access between trains and station platforms
 - ADA-Accessible Platforms – Including elevators and escalators facilitating access for customers using wheelchairs or mobility devices.
 - Wayfinding – Identifying street-level exits and directions to access nearby destinations. All other amenities will be distributed equitably throughout the MARTA service area.

Results

All MARTA buses provide the same set of amenities regardless of bus type/length, what division they are assigned to, or what route they are dispatched to.

Bus stop amenities were found to be more commonly located in minority (74.73%) and low-income (80.10%) communities than non-minority (25.27%) and non-low-income (19.90%) areas. MARTA is advancing a project to install a total of 1,000 bus shelters and benches over the next 5 years, providing opportunities to increase the number of amenities in minority and low-income areas of the first 200 shelters planned, 80.5% were installed in minority areas, and 72% were installed in low-income.

By the end of FY 2022, MARTA will have installed 400 bus amenities. 75.5% of which are proposed for minority areas, and 67% that are proposed for low-income areas.

Table 8:

Amenity Type	Minority	Non-Minority	Low-Income	Non-Low-Income
Shelter	73.70%	26.30%	79.27%	20.73%
Bench	81.50%	18.50%	85.58%	14.42%
Total	74.73%	25.27%	80.10%	19.90%

All MARTA heavy rail cars and heavy rail stations provide the same set of amenities regardless of location.

10. Vehicle Distribution

MARTA’s Vehicle Distribution policy guides assignment of vehicles to bus routes and rail lines equitably, based on ridership, demand, and route service type.

Bus

Vehicle distribution will be equitable throughout the system at the divisional level (by garage) and during daily vehicle assignment. Factors that must be considered include:

- Fuel type
- Availability by division
- Peak vehicle requirement by division
- Maintenance capability by division

Equipment is assigned to routes based on load factor and capacity requirements. At non-CNG equipped bus garages, diesel buses operate the service. 30 and 35-foot buses are prioritized for assignment to “community circulator” routes, which typically have lower ridership and neighborhood-oriented services.

MARTA has three fixed-route bus garages (Perry, Hamilton, Laredo). As of June 2021, as detailed in MARTA’s Bus Fleet Management Plan, the active bus fleet consisted of 539 fixed-route buses.

Table 9: MARTA Bus Fleet Summary

Bus Type	Count	Model Years
60’ articulated CNG	18	2016, 2021
40’ low-floor CNG	347	2006, 2009, 2010, 2013, 2014, 2015
40’ low-floor diesel	85	2018
35’ low-floor CNG	8	2013
35’ low-floor diesel	39	2004, 2018, 2019
30’ low-floor diesel	42	2017, 2018, 2019
Total	539	

MARTA typically retires buses after 12 years or 500,000 miles of service, whichever comes first. However, MARTA’s operations reflect a low peak-to-base bus

requirement ratio, which results in a high number of annual miles on each bus, resulting in some buses reaching the half-million-mile mark before 12 years of age. Accordingly, the Authority is currently replacing buses that have reached the end of useful life.

Additionally, while previously only two of MARTA’s three garages (Laredo and Perry) had CNG fueling capability, a new CNG fueling station at the third garage (Hamilton) is being completed. This will allow MARTA to operate CNG from all three garages and to all parts of MARTA’s service area.

Heavy Rail

All heavy rail vehicles are the same type. The number of cars in train consist may be adjusted based on ridership and demand at peak and off-peak periods for each line, though Green Line trains cannot exceed two cars due to the length of the Bankhead Station platform.

While all rail cars are the same type, MARTA has purchased the fleet in three orders (“classes”) starting in 1979. As of June 2021, as detailed in MARTA’s Rail Fleet Management Plan, the rail fleet consisted of 286 rail cars.

Table 10: MARTA Rail Fleet Summary

Rail Car Class	Active Count	Years
CQ310	80	1979, 1980, 1981
CQ311	96	1984, 1985, 1986, 1987, 1988
CQ312	86	2000, 2001, 2002, 2003, 2004, 2005
Total	262	

In 2008, MARTA completed mid-life overhauls of CQ310 and CQ311-class rail cars, extending their useful lives and updating car interiors.

Appendices

- Appendix A - Minority and Low-Income Route Designations
- Appendix B – On-Time Performance by Route
- Appendix C – Map of Transit Amenity Distribution
- Appendix D – Map of Transit Access

Appendix A - Minority and Low-Income Route Designations (April 2021 Mark up)

Route	Name	% Minority Area	Minority Route	% Low Income Area	Low Income Route
1	Marietta Blvd/Joseph E Lowery Blvd	42.76	Y	64.2	Y
102	North Avenue / Little Five Points	9.05	N	37.7	Y
103	Peeler Road	11.03	N	21.5	N
104	Winters Chapel Road	0.00	N	77.0	Y
107	Glenwood	69.66	Y	63.3	Y
110	Peachtree Road / Buckhead	0.00	N	1.0	N
111	Snapfinger Woods	100.00	Y	61.6	Y
114	Columbia Drive	70.22	Y	45.7	Y
115	Covington Highway	97.49	Y	58.0	Y
116	Redan Road	100.00	Y	53.2	Y
117	Rockbridge Road / Panola Road	88.42	Y	46.8	Y
119	Hairston Road / Stone Mtn Village	95.56	Y	97.7	Y
12	Howell Mill Road / Cumberland	0.84	N	14.6	N
120	East Ponce De Leon Avenue	67.51	Y	66.1	Y
121	Memorial Drive / N Hairston Road	50.65	Y	64.0	Y
123	Church Street	27.89	N	16.1	N
124	Pleasantdale Road	14.22	N	68.6	Y
125	Clarkston	49.81	Y	38.5	Y
126	Embry Hills	25.83	N	46.8	Y
132	Tilly Mill Road	13.46	N	24.9	N
133	Shallowford Road	23.16	N	50.9	Y
14	14th Street / Blandtown	0.00	N	55.9	Y
140	North Point Parkway	12.73	N	20.5	N
141	Haynes Bridge Road / Milton	5.41	N	15.8	N
142	East Holcomb Bridge Road	1.02	N	18.9	N
143	Windward Park & Ride	7.21	N	17.6	N
15	Candler Road	88.65	Y	43.5	Y
153	James Jackson Parkway	98.57	Y	89.7	Y
155	Pittsburgh	100.00	Y	97.1	Y
162	Myrtle Drive / Alison Court	97.41	Y	94.6	Y
165	Fairburn Road	100.00	Y	74.2	Y
172	Sylvan Road / Virginia Avenue	77.68	Y	74.6	Y
178	Empire Blvd / Southside Ind Park	93.09	Y	69.2	Y
180	Roosevelt Highway	95.53	Y	51.2	Y
181	Washington Road / Fairburn	96.03	Y	62.8	Y
183	Greenbriar	91.78	Y	59.9	Y
185	Alpharetta	9.63	N	32.5	N
186	Rainbow Drive / South DeKalb	72.76	Y	51.8	Y
188	Oakley Industrial	90.75	Y	24.9	N
189	Flat Shoals Road / Scofield Road	93.70	Y	24.7	N
19	Clairmont Road / Howard Avenue	16.94	N	27.2	N
191	Riverdale / ATL Intl Terminal	88.08	Y	70.4	Y
192	Old Dixie / Tara Boulevard	83.37	Y	68.2	Y
193	Morrow / Jonesboro	91.07	Y	74.4	Y
194	Conley Road / Mt Zion	86.39	Y	58.4	Y

195	Forest Parkway	92.16	Y	48.3	Y
196	Upper Riverdale	79.26	Y	73.9	Y
2	Ponce de Leon Avenue / Druid Hills	2.83	N	16.6	N
201	Six Flags Over Georgia	100.00	Y	98.9	Y
21	Memorial Drive	40.01	Y	36.6	Y
221	Memorial Drive Limited	90.92	Y	95.4	Y
24	McAfee / Hosea Williams	79.45	Y	75.5	Y
25	Peachtree Boulevard	2.95	N	34.2	Y
26	Marietta Street / Perry Boulevard	56.43	Y	53.7	Y
27	Cheshire Bridge Road	0.00	N	15.3	N
295	Metropolitan Campus Express	100.00	Y	100.0	Y
3	Martin Luther King Jr Dr/Auburn Ave	87.37	Y	96.6	Y
30	LaVista Road	4.35	N	6.4	N
32	Bouldercrest	75.48	Y	25.5	N
34	Gresham Road	80.93	Y	35.4	Y
36	N Decatur Road / Virginia Highland	4.09	N	24.4	N
37	Defoors Ferry Road	0.00	N	23.4	N
39	Buford Highway	21.33	N	60.3	Y
4	Moreland Avenue	57.21	Y	63.0	Y
40	Peachtree Street / Downtown	54.16	Y	68.1	Y
42	Pryor Road	94.23	Y	97.6	Y
47	I-85 Access Road	19.59	N	55.0	Y
49	McDonough Boulevard	85.92	Y	87.7	Y
5	Piedmont Road / Sandy Springs	5.93	N	3.8	N
50	Donald Lee Hollowell Parkway	79.13	Y	78.8	Y
51	Joseph E Boone Boulevard	85.31	Y	96.0	Y
55	Jonesboro Road	88.78	Y	95.0	Y
58	Hollywood Road / Lucile Avenue	91.57	Y	83.2	Y
6	Clifton Road / Emory	0.00	N	26.9	N
60	Hightower Road	63.73	Y	69.8	Y
66	Lynhurst Drive / Princeton Lakes	100.00	Y	68.7	Y
68	Benjamin E Mays Drive	100.00	Y	64.8	Y
71	Cascade Road	100.00	Y	71.3	Y
73	Fulton Industrial	98.97	Y	56.0	Y
74	Flat Shoals Road	64.28	Y	53.6	Y
75	Lawrenceville Highway	8.22	N	17.9	N
78	Cleveland Avenue	93.84	Y	81.0	Y
79	Sylvan Hills	89.02	Y	84.4	Y
8	North Druid Hills Road	23.13	N	22.5	N
800	Lovejoy	78.25	Y	52.5	Y
809	Monroe Drive / Boulevard	7.76	N	21.1	N
81	Venetian Hills / Delowe Drive	88.27	Y	81.8	Y
813	Atlanta University Center	93.03	Y	97.5	Y
816	North Highland Avenue	15.29	N	38.9	Y
82	Camp Creek / South Fulton Parkway	96.11	Y	37.4	Y
823	Belvedere	41.94	Y	13.1	N
825	Johnson Ferry Road	6.63	N	6.6	N
83	Campbellton Road	100.00	Y	81.4	Y

832	Grant Park	51.63	Y	49.1	Y
84	Washington Rd/Camp Crk Marketplace	92.64	Y	51.6	Y
85	Roswell	6.93	N	35.8	Y
850	Carroll Heights / Fairburn Heights	96.14	Y	78.6	Y
853	Center Hill	100.00	Y	90.1	Y
856	Baker Hills / Wilson Mill Meadows	100.00	Y	88.6	Y
86	Fairington Road	96.16	Y	44.0	Y
865	Boulder Park Drive	100.00	Y	91.9	Y
867	Peyton Forest / Dixie Hills	100.00	Y	92.1	Y
87	Roswell Road / Sandy Springs	16.10	N	24.5	N
89	Old National Highway	91.68	Y	41.9	Y
899	Old Fourth Ward	31.29	N	58.7	Y
9	Boulevard / Tilson Road	65.42	Y	46.0	Y
93	Headland Drive / Main Street	79.44	Y	75.8	Y
94	Northside Drive	62.28	Y	75.7	Y
95	Metropolitan Parkway	89.30	Y	88.6	Y
148	Mount Vernon Highway	0.80	N	0.0	N
150	Dunwoody Village	28.50	N	0.0	N

Appendix B - On-Time Performance by Route (April 2021 Mark up)

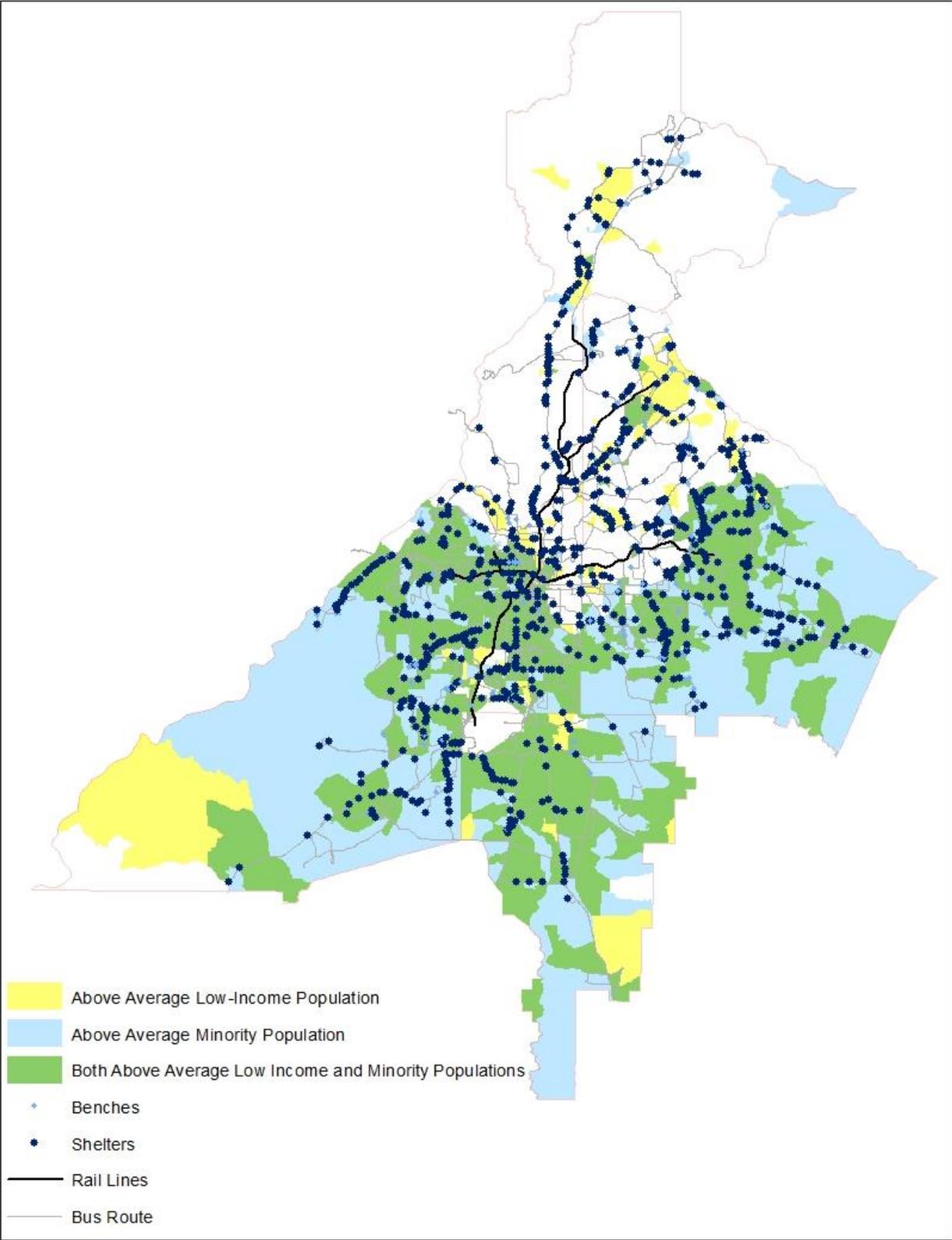
Route	Name	Minority Route	Low Income Route	Percent On-Time	Schedule Adherence Met? (78.5%)
1	Marietta Blvd/Joseph E Lowery Blvd	Y	Y	86.87	Y
102	North Avenue / Little Five Points	N	Y	81.16	Y
103	Peeler Road	N	N	88.9	Y
104	Winters Chapel Road	N	Y	94.56	Y
107	Glenwood	Y	Y	84.79	Y
110	Peachtree Road / Buckhead	N	N	88.46	Y
111	Snapfinger Woods	Y	Y	81.62	Y
114	Columbia Drive	Y	Y	79.1	Y
115	Covington Highway	Y	Y	82.37	Y
116	Redan Road	Y	Y	87.82	Y
117	Rockbridge Road / Panola Road	Y	Y	81.52	Y
119	Hairston Road / Stone Mtn Village	Y	Y	82.93	Y
12	Howell Mill Road / Cumberland	N	N	84.48	Y
120	East Ponce De Leon Avenue	Y	Y	91.52	Y

121	Memorial Drive / N Hairston Road	Y	Y	78.52	Y
123	Church Street	N	N	90.87	Y
124	Pleasantdale Road	N	Y	88.67	Y
125	Clarkston	Y	Y	87.8	Y
126	Embry Hills	N	Y	86.35	Y
132	Tilly Mill Road	N	N	84.04	Y
133	Shallowford Road	N	Y	89.4	Y
14	14th Street / Blandtown	N	Y	87.35	Y
140	North Point Parkway	N	N	87.2	Y
141	Haynes Bridge Road / Milton	N	N	84.14	Y
142	East Holcomb Bridge Road	N	N	72.51	N
143	Windward Park & Ride	N	N	79.59	Y
15	Candler Road	Y	Y	81.01	Y
153	James Jackson Parkway	Y	Y	78.27	N
155	Pittsburgh	Y	Y	85.04	Y
162	Myrtle Drive / Alison Court	Y	Y	90.99	Y
165	Fairburn Road	Y	Y	85.89	Y
172	Sylvan Road / Virginia Avenue	Y	Y	90.18	Y
178	Empire Blvd / Southside Ind Park	Y	Y	92.01	Y
180	Roosevelt Highway	Y	Y	82.75	Y
181	Washington Road / Fairburn	Y	Y	77.8	N
183	Greenbriar	Y	Y	89.09	Y
185	Alpharetta	N	N	83.05	Y
186	Rainbow Drive / South DeKalb	Y	Y	86.46	Y
188	Oakley Industrial	Y	N	73.82	N
189	Flat Shoals Road / Scofield Road	Y	N	83.77	Y
19	Clairmont Road / Howard Avenue	N	N	78.17	N
191	Riverdale / ATL Intl Terminal	Y	Y	80.16	Y
192	Old Dixie / Tara Boulevard	Y	Y	75.29	N
193	Morrow / Jonesboro	Y	Y	79.86	Y
194	Conley Road / Mt Zion	Y	Y	77.69	N
195	Forest Parkway	Y	Y	77.07	N

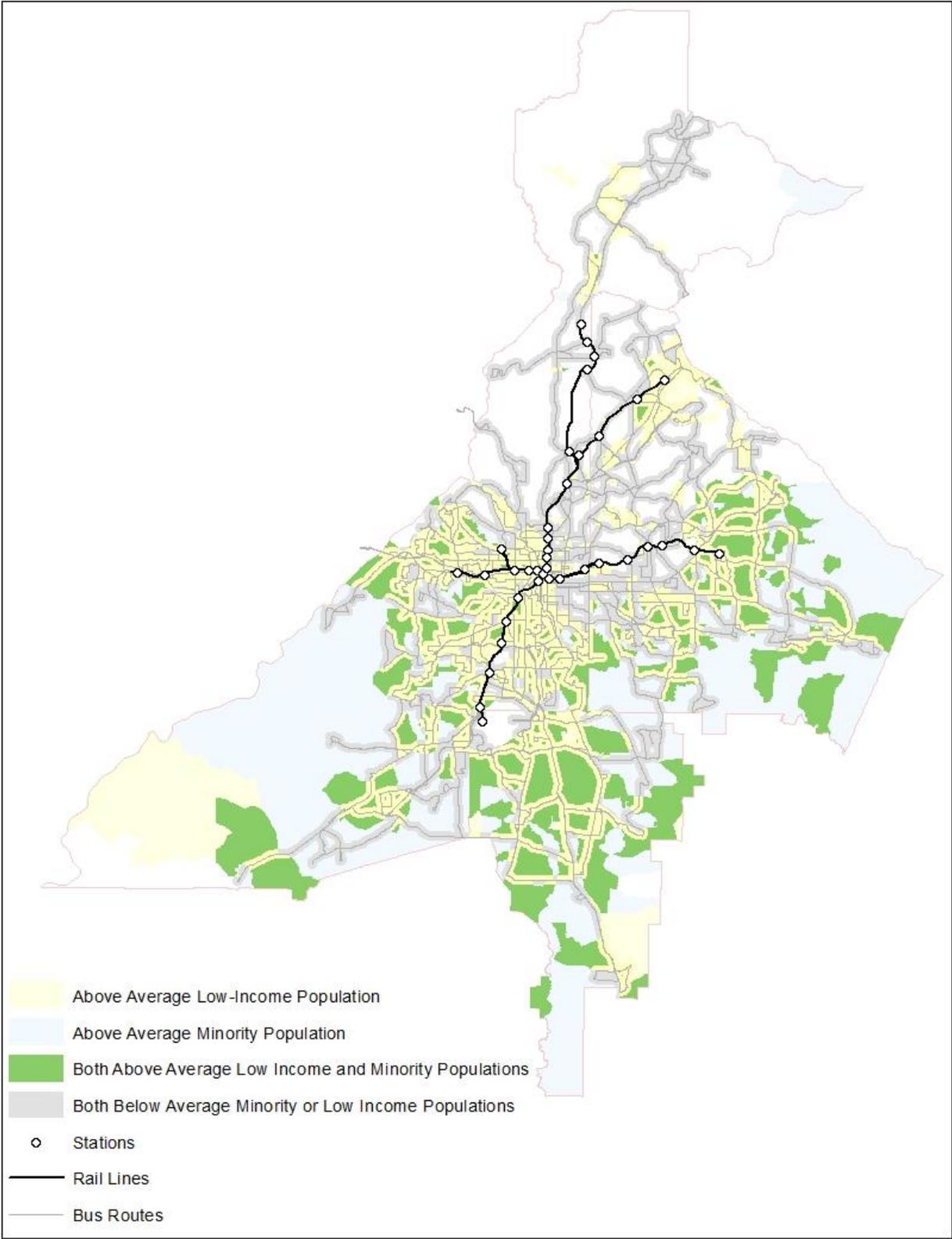
196	Upper Riverdale	Y	Y	81.36	Y
2	Ponce de Leon Avenue / Druid Hills	N	N	88.05	Y
201	Six Flags Over Georgia	Y	Y	89.44	Y
21	Memorial Drive	Y	Y	82.66	Y
221	Memorial Drive Limited	Y	Y	87.08	Y
24	McAfee / Hosea Williams	Y	Y	84.24	Y
25	Peachtree Boulevard	N	Y	88.74	Y
26	Marietta Street / Perry Boulevard	Y	Y	88.18	Y
27	Cheshire Bridge Road	N	N	81.57	Y
295	Metropolitan Campus Express	Y	Y	80.51	Y
3	Martin Luther King Jr Dr/Auburn Ave	Y	Y	83.14	Y
30	LaVista Road	N	N	86.66	Y
32	Bouldercrest	Y	N	79.82	Y
34	Gresham Road	Y	Y	88.48	Y
36	N Decatur Road / Virginia Highland	N	N	85.23	Y
37	Defoors Ferry Road	N	N	80.38	Y
39	Buford Highway	N	Y	85.64	Y
4	Moreland Avenue	Y	Y	77.02	N
40	Peachtree Street / Downtown	Y	Y	81.17	Y
42	Pryor Road	Y	Y	83.77	Y
47	I-85 Access Road	N	Y	87.94	Y
49	McDonough Boulevard	Y	Y	87.84	Y
5	Piedmont Road / Sandy Springs	N	N	84.16	Y
50	Donald Lee Hollowell Parkway	Y	Y	79.82	Y
51	Joseph E Boone Boulevard	Y	Y	85.25	Y
55	Jonesboro Road	Y	Y	86.83	Y
58	Hollywood Road / Lucile Avenue	Y	Y	86.92	Y
6	Clifton Road / Emory	N	N	79.21	Y
60	Hightower Road	Y	Y	81.5	Y
66	Lynhurst Drive / Princeton Lakes	Y	Y	87.57	Y
68	Benjamin E Mays Drive	Y	Y	90.2	Y
71	Cascade Road	Y	Y	87.24	Y
73	Fulton Industrial	Y	Y	84.96	Y

74	Flat Shoals Road	Y	Y	80.1	Y
75	Lawrenceville Highway	N	N	83.91	Y
78	Cleveland Avenue	Y	Y	78.82	Y
79	Sylvan Hills	Y	Y	89.93	Y
8	North Druid Hills Road	N	N	80.27	Y
800	Lovejoy	Y	Y	83.76	Y
809	Monroe Drive / Boulevard	N	N	83.6	Y
81	Venetian Hills / Delowe Drive	Y	Y	90.14	Y
813	Atlanta University Center	Y	Y	85.03	Y
816	North Highland Avenue	N	Y	81.56	Y
82	Camp Creek / South Fulton Parkway	Y	Y	84.69	Y
823	Belvedere	Y	N	84.42	Y
825	Johnson Ferry Road	N	N	91.51	Y
83	Campbellton Road	Y	Y	85.73	Y
832	Grant Park	Y	Y	79.82	Y
84	Washington Rd/Camp Crk Marketplace	Y	Y	77.79	N
85	Roswell	N	Y	87.07	Y
850	Carroll Heights / Fairburn Heights	Y	Y	80.57	Y
853	Center Hill	Y	Y	87.55	Y
856	Baker Hills / Wilson Mill Meadows	Y	Y	79.7	Y
86	Fairington Road	Y	Y	84.86	Y
865	Boulder Park Drive	Y	Y	85.39	Y
867	Peyton Forest / Dixie Hills	Y	Y	78.73	Y
87	Roswell Road / Sandy Springs	N	N	88.96	Y
89	Old National Highway	Y	Y	79.93	Y
899	Old Fourth Ward	N	Y	82.57	Y
9	Boulevard / Tilson Road	Y	Y	85.48	Y
93	Headland Drive / Main Street	Y	Y	85.2	Y
94	Northside Drive	Y	Y	82.16	Y
95	Metropolitan Parkway	Y	Y	88.81	Y
148	Mount Vernon Highway	N	N	85.61	Y
150	Dunwoody Village	N	N	85.53	Y

Appendix C – Map of Bus Stop Amenity Distribution (April 2021 Mark Up)



Appendix D – Map of Transit Access (April 2021 Mark Up)



Collecting and Reporting Demographic Data - Demographic and Service Profile Maps

During the Triennial 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, are affected prior to any proposed service reductions or eliminations. **(Exhibit 10A-10E).**

As required under Circular 4702.1B, MARTA updated its demographic and service profile maps using 2015-2019 American Community Survey (ACS) data from the Census Bureau and 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 three-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 10-A).**
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 10-B).**
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 10-C).**
4. A map overlaying minority population 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 10-D).**
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 10-E**).

Demographics and Travel Patterns - The Department of Research and Analysis (R&A), provides ridership statistics and analyses for the Title VI assessments produced by MARTA. The specific tasks carried out include: 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' opinions 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, R&A conducts an annual Quality of Service survey with several thousands of respondents each year. 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 in designing initiatives and priority setting for future service improvement programs. In conducting the survey, MARTA uses I-Speak cards when necessary. In addition, bilingual surveyors were placed on highly Spanish-speaking routes and surveys were translated into Spanish. The Quality-of-Service survey includes questions about the primary language spoken at home. Survey respondents who indicated that they spoke a language other than English in the home were asked to rate their ability to speak, read, and understand English.

The FY20 Quality of Service Survey database was used to compile information on demographic attributes of MARTA's riders for Title VI Assessment. The report presents statistics from 5,065 face-to-face General Rider interviews that R&A interviewers conducted on board MARTA's rail and fixed route bus systems.

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, annual statistics from FY2020. This analysis helps MARTA to demine the extent to which members of minority groups are beneficiaries of programs and services. The tables that follow present FY20 Quality of Service demographic information on the following race, income, and modes of transit used.

Race

Race	FY20 %*
Black	74.2%
White	15.6%
Hispanic or Latino	7.6%
American Indian / Alaska Native	0.3%
Asian Indian	1.5%
Chinese	0.4%
Japanese	0.1%
Vietnamese	0.2%
Korean	0.3%
Other Asian	0.5%
Native Hawaiian or Other Pacific Islander	0.6%
Other	0.7%
* Percentages sum to more than 100% because multiple responses were allowed.	

Annual Household Income

Income Range	Percent
Under \$10,000	17.6%
\$10,000-19,999	17.4%
\$20,000-29,999	17.9%
\$30,000-39,999	15.1%
\$40,000-49,999	9.1%
\$50,000-74,999	10.9%
\$75,000 and Over	12.0%
Total	100%

Travel Patterns of Riders/Usual Mode of Travel

Mode	Percent
Rail Only	30.7%
Bus Only	18.7%
Bus & Rail	50.9%
Total	100%

Comparative Analysis - Based upon the requirements as outlined in FTA Circular 4702.1B, Chapter IV, Section 5b, the following is a demographic profile that compares minority and non-minority riders on the variable's 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.

Comparative Summary - More than 8 out of 10 MARTA riders fall into a minority classification. Compared to non-minorities, minority riders tend to be:

- Lower in income
- More likely to ride both bus and rail
- Have higher usage of 1 to 7 day passes and lower usage of 30 day and trip passes
- More frequent riders (9 trips or more per week)

Comparison of Income – Minorities vs. Non-Minorities

Income Range	Minorities (A)	Non-Minorities (B)
Under \$10,000	19.4%*	7.0%*
\$10,000-19,999	19.5%*	5.7%*
\$20,000-29,999	19.1%*	10.9%*
\$30,000-39,999	15.8%*	9.8%*
\$40,000-49,999	9.3%*	8.2%*
\$50,000-74,999	9.0%*	22.2%*
\$75,000 and Over	7.9%*	36.2%*
Total	100.0%	100.0%
Median Income Category	\$20,000-29,999	\$50,000-74,999
* For each row, percentages marked with an asterisk are statistically different at the 95% confidence level.		

Comparison of Mode Usage – Minorities vs. Non-Minorities

Mode	Minorities (A)	Non-Minorities (B)
Only riding the train on this trip	21.0%*	65.2%*
Only riding the bus on this trip	20.1%*	10.5%*
Riding both bus and train on this trip	59.4%*	24.3%*
Total	100.0%	100.0%

* For each row, percentages marked with an asterisk are statistically different at the 95% confidence level.

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

Fare Payment Method	Minorities (A)	Non-Minorities (B)
Cash on bus	6.9%*	0.2%*
Regular 30-day Breeze pass	18.2%*	25.9%*
1 to 7 day Breeze pass	33.0%*	8.6%*
Half-fare Breeze	7.9%	6.6%
Mobility Breeze	0.4%	0.0%
Breeze Card with specific number of trips loaded	18.0%*	33.7%*
Discounted or free pass through employer	5.5%*	14.8%*
Regular Breeze with stored value	9.1%	8.6%
Student pass	0.5%	0.9%
Other (Specify below)	0.5%	0.6%
Total	100.0%	100.0%

* For each row, percentages marked with an asterisk are statistically different at the 95% confidence level.

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

Trips per Week	Minorities (A)	Non-Minorities (B)
Light (0-4 per week)	21.9%*	37.7%*
Moderate (5-8 per week)	16.0%*	14.7%*
Heavy (9 or more per week)	62.2%*	47.6%*
Average Trips Per Week	9.07*	6.68*

* For each row, percentages marked with an asterisk are statistically different at the 95% confidence level.

Comparison of Fare Payment Method – Low Income vs. Medium or High Income

Fare Payment Method	Low Income (≤ 150% of Poverty Level)	Medium or High Income (>150% of Poverty Level)
1 to 7 day Breeze pass	34.3%*	23.1%*
Breeze Card with specific number of trips loaded	17.7%*	22.6%*
Regular 30-day Breeze pass	16.5%*	22.6%*
Regular Breeze with stored value	9.1%	11.0%
Cash on bus	8.6%*	3.7%*
Half-fare Breeze	7.9%	5.3%
Discounted or free pass through employer	4.6%*	10.3%*
Student pass	0.7%	0.5%
Mobility Breeze	0.4%	0.0%
Other (Specify below)	0.2%	0.7%
Total	100.0%	100.0%
* For each row, percentages marked with an asterisk are statistically different at the 95% confidence level.		

Language Spoken at Home - In order to comply with FTA Circular 4702.1B, Research and Analysis asks patrons which languages other than English are spoken at home. In FY15, the Quality-of-Service survey began asking riders to rate their ability to speak, read, and understand English if English was not their primary language.

Research and Analysis also reviews current Census data to supplement survey data on languages spoken at home by residents of the MARTA service area. Detailed tables from the QOS and U.S. Census American Community Survey can be found in the MARTA LEP Plan.

Major Service Change Policy (Exhibit 11) - 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 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 Service Equity Policies require 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.
- 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.

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.

Determination of System-Level Impacts - To determine the final system-wide impacts of the service changes, MARTA compares 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 are re-examined.

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 MARTA 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 the Service Equity Analysis conducted by MARTA. Maps of demographics and route changes in the service area were also provided as a part of this analysis.

4702.1B Requirements - Regarding specific requirements of the FTA Circular, MARTA assessed the effects of the proposed service changes on minority and low-income populations,

For route changes (a):

- MARTA provided maps 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.
- These maps of routes that were changed and the service area's minority and low-income tracts are contained in the Title VI Service Equity Analysis.
- 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 the Title VI Service Equity Analysis.

For span of service (b):

- There was no 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, ridership data in conjunction with demographic data was used to assess these impacts, specifically identifying ridership activity during the time period proposed for changes.

In its Equity Analysis MARTA assessed the alternatives available for people affected by the fare increase or major service changes and provided a summary of these alternatives for each route. MARTA also described the actions the agency proposed to minimize, mitigate, or offset any adverse effects of proposed fare and service changes on minority and low-income populations when needed, which includes public participation, cost-containment measures, and other mitigating processes. MARTA also determines which, if any, of the proposals under consideration would have a disproportionately high and adverse effect on minority and low-income riders by looking at route-by-route descriptions of ridership and demographic impacts, along with other rated information.

Evaluation of Service and Fare Changes – MARTA did not have any fare changes during the program plan period and does not anticipate a fare change in the near future. However, MARTA has undergone and will continue to undergo major service changes.

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.

Service Modifications - During this Plan year, as part of MARTA's regular "mark-ups", which occurs three times per year, proposed changes were screened and implemented. A service equity analysis was completed on all proposed changes that met the "major service" threshold. Based on public input during the numerous public hearings and community engagements;

MARTA modified the proposed changes to eliminate any disparate impacts or disproportionate burdens that the service equity analysis revealed, however the December 18, 2021 service modification revealed temporary negative effects. **(Exhibit 12)**

As part of MARTA's regular schedule of service adjustments, MARTA implemented several transit service modifications on December 18, 2021. These modifications were designed to create new efficiencies in MARTA's route structures. A set of temporary schedule reductions was necessarily implemented to improve the reliability of service as MARTA navigates a critical shortage of bus operators.

The majority of temporary negative effects are caused by MARTA's plan to resolve a 14% deficit in Bus Operators caused by the pandemic. As a result of this operator shortage, MARTA has been unable to run all its scheduled trips causing unreliability on some routes. In an effort to mitigate these issues, MARTA had to implement a two-fold temporary service plan focused on reduced frequencies of service and recruitment. Most routes will run on a reduced schedule based on current Saturday service levels. To address the shortage of bus operators, MARTA has been implementing hiring strategies such as monthly job fairs, streamlined application process, job requirement changes, and signing bonuses.

For regularly performed Service Equity Analyses, MARTA utilizes American Community Survey census data in a GIS analysis and updates when new 5-year datasets are released.

MARTA's Fare Policy - As excerpted from the MARTA Act, Section 9 (h), MARTA's official fare policy, as determined by the Georgia State Legislature is as follows **(Exhibit 13)**:

Notwithstanding any other provisions of this Act to the contrary, not later than 120 days after the end of each fiscal year of the Authority, the Board shall adjust the amounts to be charged for transportation services to the public so that the total funds to be received from transit operating revenue during the fiscal year ... shall be no less than thirty-five percent of the operating costs of the system for the immediately preceding fiscal year. In making such adjustments, the Board shall be authorized to rely upon estimates of all revenue, patronage, and other factors which may affect the amounts to be charged for transportation services to the public; provided, if such amounts actually charged during one fiscal year resulted in transit operating revenue less than that required under this subsection, the amounts to be charged the immediately succeeding fiscal year shall be sufficient, along with all other transit operating revenue, to make up such deficit as well as meet the other requirements of this subsection.

Guiding Principles - To comply with the state mandated fare policy and FTA Circular 4702.1B, it is MARTA's responsibility to determine how best to arrange its fare structure. In doing so, MARTA seeks to reflect the following principles:

- Maintenance of a flat-fare policy with free transfers when rides are purchased with Breeze media. This principle will remain in effect at least until after regional fare studies

have been completed. Pending the recommendations of these studies, variable based fares may be considered in the future.

- Maximization of ridership through maintaining the satisfaction of current riders plus attracting new riders.
- Maximization of revenue through encouragement of stored time period purchases.
- Provision of rewards for frequent ridership through discounted fare media for multi-trip purchases.
- Satisfaction of Title VI principles governing the equitable application of fares so as not to disproportionately burden, or disparately impact, protected populations.
- Meaningful public engagement in the decision-making process for fare policy development and future fare changes.

Fare Structure Changes and Title VI Statement - All future proposed changes in fare structure shall be subject to the Title VI data analysis and impact assessment process, as required by the Federal Transit Administration (FTA).

In general, the Title VI fare equity data analysis shall be based on the examination of the proposed fare structure change using MARTA's internal Fare Elasticity Model, in conjunction with demographic data from MARTA's internal Quality of Service survey of customers. The FTA Circular C 4702.1B, Chapter IV-19 requires that fare equity analyses be completed using a four-step process, as follows:

- Determine the number and percentage of users of each fare medium being changed.
- Review fares before the change and after the change and compute the percentage increase (or decrease) associated with each.
- Compare the differences for each particular fare medium between protected population users and other "general" users.
- Compare the differences for each particular fare medium between low-income users and other "general" users.

For MARTA, the fare types to be analyzed are a) Base Fare media; b) Discounted 20-Trip Pass; c) 1-4- and 7-Day Passes as a group; d) 30-Day, Monthly, and Annual Passes as a group; e) Reduced Fare Program media as a group; f) Mobility Program media as a group. Categories "e" and "f" are by definition for protected populations, while the other categories are used by protected populations and low-income populations to a greater or lesser extent. Approximately 96% of all paid passenger boarding's on MARTA are made using one of these categories.

The thresholds for minority disparate impact and low-income disproportionate burden are set in two steps as follows:

- If the percentage increase in fare from the existing fare structure to the proposed fare structure for a particular fare payment method is more than 5.0 percentage points

greater than the base fare percentage increase, then the particular fare payment method will be subject to a statistical analysis.

- In the statistical analysis, if the protected population's usage proportion for that same fare payment method is tested to be statistically greater than the general riding population's usage proportion for that fare payment method, then the proposed increase in the particular fare payment method will be determined to have a disparate impact or disproportionate burden. The statistical test to be used is the Difference in Proportions test for two dichotomous variables at the 95% significance level.

In a case where disparate impact or disproportionate burden is found, MARTA will implement that fare change only if there is a substantial legitimate justification and will describe the available alternatives to minority and/or low-income populations affected by the fare change, including taking steps to avoid, minimize, or mitigate adverse impacts where practical. These steps will be undertaken as part of MARTA's public engagement process, including public hearings.

Fare Increase – At the time, MARTA is not proposing a fare increase during the program plan period. If MARTA does propose a fare increase, MARTA will launch an extensive outreach plan and public comment period to educate riders and the general public about the fare policy change, potential fare change scenarios and to collect public feedback on the proposals.

Fare Equity Analysis – In the event that MARTA decides to propose a fare change, to ensure that the proposed revisions to the fare policy do not have a disparate impact on the minority population and/or a disproportionate burden on the low-income population, MARTA would conduct a fare equity analysis during the planning phase.

If any disparate impact or disproportionate burden is found, MARTA will consider steps to avoid, minimize, or mitigate the adverse impacts and reanalyze the modified changes to determine if the impacts are removed or lessened. Below are the procedures MARTA would use to complete the Title VI Fare Change Impact Assessment:

- ***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.
- ***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.
- ***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.

- **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.

Fare Change Procedures - MARTA's Quality of Service Surveys 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.