



Metropolitan Atlanta Rapid Transit Authority Title VI Program Update 2019 - 2022

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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.

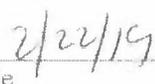
The Executive Director of Diversity and Inclusion is responsible for initiating and monitoring Title VI activities, preparing required reports, and ensuring that MARTA adheres to other compliance responsibilities as required by applicable regulations. The Title VI Program provides ongoing direction and 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.



Jeffrey A. Parker
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 ninth 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 1,041,423), DeKalb County (population average 753,253) and Clayton County (population average 285,153) with a combined three-county service population of over two million people. For the first four months of FY2019 (July-October 2018), the average daily ridership for the system (bus, rail and Mobility) was 469,800 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 and approved by all internal stakeholders including the MARTA Board of Directors (**Exhibit 1**).

To this end, Jeffrey A. Parker, 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 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 annual Title VI reviews of special emphasis program areas (education and training, environmental affairs, and consultant contracts) to determine the effectiveness of program activities at all levels.
- Conducting Title VI reviews of all consultant contractors and sub-recipients of federal funds directly distributed by MARTA.
- Reviewing the MARTA work program in coordination with Title VI liaisons for special emphasis program areas and, where applicable, include Title VI language and related requirements.
- Assisting the MARTA Executive Management Team in the distribution of information on training programs regarding Title VI and related statutes.
- Developing Title VI information for dissemination to the general public and, where appropriate, provide versions in languages other than English.
- Identifying, investigating, and eliminating discrimination when found to exist.
- Establishing procedures for promptly resolving deficiencies and producing written documentation of any remedial action that is necessary.

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 2019 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.
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.

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

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 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) replaced the EDAAC in May 2015. The 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:** As defined in the MARTA Service Standards, also known as demand responsive or dial-a-ride service, this door-to-door service responds to passenger request made by telephone. It is typically operated in lieu of fixed-route service with small vehicles in a geographical area that generates low levels of demand.
34. **Para-transit:** As defined in the MARTA Service Standards, this term refers to demand responsive transportation that requires a request for service and which does not necessarily operate on a fixed-route or fixed-schedule. 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 Hour Only:** As defined in the MARTA Service Standards, the term refers to a transit route that operates on weekdays only during the AM and PM peak periods as defined.
37. **Predominantly Minority Area:** A geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.
38. **Primary Recipient:** Any FTA recipient that extends federal financial assistance to a sub-recipient.
39. **Productivity:** As defined in the MARTA Service Standards, this term refers to the ratio of units of transportation output to units of input, for example, vehicle miles per operator hour, or passenger miles per unit cost of operation.

40. **Provider of fixed-route public transportation (or “transit provider”):** Any entity that operates public transportation service and includes states, local and regional entities, and public and private entities. This term is used in place of “recipient” in chapter IV and is inclusive of direct recipients, primary recipients, designated recipients, and sub-recipients that provide fixed-route public transportation service.
41. **Public Transportation:** Regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income, and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed-route or demand response service.
42. **Recipient:** Any public or private entity that receives federal financial assistance from 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.
43. **Regional:** As defined in the MARTA Service Standards, this term refers to transit lines with few stations and high operating speeds. They primarily serve long trips of long duration or distance within metropolitan regions, as distinguished from local transit service and short-haul transit service.
44. **Ridership:** As defined in the MARTA Service Standards, this term refers to the number of people making one-way trips on a public transportation system in a given time period.
45. **Route:** As defined in the MARTA Service Standards, this term refers to the geographical path followed by a vehicle or traveler from start to finish of a given trip.
46. **Route Spacing:** As defined in the MARTA Service Standards, this term refers to the distance between routes, calculated with such variable as potential riders per acre, walking distance to stops, and type of service being supplied.
47. **Segments:** As defined in the MARTA Service Standards, this term refers to the portions of routes delineated from others on the basis of such aspects as collection or delivery points or the portion between these points.
48. **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.
49. **Service Class:** As defined in the MARTA Service Standards, this term refers to the delineation made between such types of service as local, limited, and regional.
50. **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.

51. **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.
52. **Stop Spacing:** As defined in the MARTA Service Standards, this term refers to the distance between consecutive transit stops.
53. **Sub-recipient:** An entity that receives federal financial assistance from the FTA through a primary recipient.
54. **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.
55. **Title VI/LEP Committee:** The MARTA internal inter-departmental task force created to address and strive to resolve Title VI compliance-related issues presented to D&I by its employees, patrons and members of the general public.
56. **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.
57. **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.
58. **Transfer:** As defined in the MARTA Service Standards, this term refers to a passenger's change from one transit unit or mode to another unit or mode.
59. **Transit Amenity:** As outlined in the MARTA Service Standards, this term refers to any service amenity, defined as any item or service that is provided specifically to increase the comfort and/or convenience of using the MARTA system. Currently available amenities include bus stops, bus shelters, benches, trash receptacles, system maps, individual route schedules, electronic sign post, emergency phones, customer assistance phones, police phones, escalators, elevators, Wi-Fi, Rail Network television displays and bike racks.
60. **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.
61. **Transit System:** As defined in the MARTA Service Standards, this term refers to the facilities, equipment, personnel, and procedures needed to provide and maintain public transit service.

62. **Transportation Improvement Program (TIP):** A prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by an MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.
63. **Transportation Management Area (TMA):** An urbanized area with a population over 200,000, as defined by the Bureau of the Census and designated by the Secretary of Transportation, or any additional area where TMA designation is requested by the Governor and the MPO and designated by the Secretary of Transportation.
64. **Travel Time:** As defined in the MARTA Service Standards, this term refers to the time duration of a linked trip on transit that is from the point of origin to the final destination, including walking time at transfer points and trip ends.
65. **Trip:** As defined in the MARTA 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. Title VI Program Overview

Title VI Assurances and Certifications - In accordance with 49 CFR Section 21.7(a) and FTA Circular 4702.1B, Chapter III, Parts 2 and 12, the required certifications and assurances were compiled for 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 2018 (**Exhibit 2**).

MARTA sub-recipients included organizations that received federal assistance, which were awarded through MARTA rather than by the FTA directly. Although under certain grants, MARTA may have delegated any or almost all project responsibilities to one or more sub-recipients, MARTA understood that it was ultimately accountable to 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 Reduced Fare Office, ride stores and all transit stations. A sample of the MARTA Title VI Notice is attached (**Exhibit 3**).

Title VI Complaint Procedures and Complaint Form - During this Plan update, MARTA did not have any Title VI Lawsuits and very few Title VI formal investigations or complaints (**Exhibit 4**). 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. In addition, recommendations for the resolution of a systemic service delivery issue are also addressed through the Title VI/LEP Advisory Committee. As a result of the proactive measures taken to resolve customer concerns at the lowest level possible, filing of complaints that requires Title VI investigations, have been greatly decrease.

If an individual wishes to file a Title VI complaint, MARTA has developed and implemented Title VI Complaint Procedures for investigating and tracking Title VI complaints and also has a Title VI Complaint Form (**Exhibit 5**). Both the Title VI complaint procedures and the form are available to the public and posted on the MARTA website. The Title VI Complaint process is also communicated to the public through station signage. Information on how to file a Title VI Complaint is available in alternative formats and languages. The process of filing a Title VI complaint has also been explained internally through the Title VI/LEP Committee, Executive Management Team presentations and employee training.

Any person who believes himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color, or national origin may, by himself or by a representative, file a written complaint with MARTA within **180 days** after the date of the alleged discrimination at: MARTA's Office of Diversity and 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.

Inclusive Public Participation - MARTA supports, values and promotes the inclusive public participation of minority, low-income and LEP populations. In order to expand public participation, MARTA works in close collaboration and partnership with other departments. To this end, the Department of External Affairs carries a vital role in support of the Title VI Program through the implementation of community outreach, communication programs and strategic marketing initiatives. In addition, the department has ongoing interactions with transit riders, advocacy groups, government entities, media outlets, and the general public.

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 in order to communicate pertinent information to constituencies, including service changes and enhancements, emergency situations posing an immediate threat to the safety and security of MARTA customers or its service area, and policy changes.

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

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP populations.
- Ensuring different meeting group sizes and formats at community meetings and public hearings.
- Coordinating with community and faith-based organizations, educational institutions and other organizations to implement public engagement strategies that target members of affected minority and/or LEP communities.
- Utilizing radio, television, or newspaper ads on stations and in publications that serve LEP populations.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Public Hearings and Public Outreach - MARTA has developed a Public Hearing Policy and Procedure to establish guidelines for conducting public hearings and outreach in relation to Title VI, minority and low-income population groups (**Exhibit 6**). 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 times as outlined below:

2016 Public Hearings and Meetings (Exhibit 7-A)

Topic: Public Hearing on the proposed bus service modifications for April 16, 2016 - Public Hearings: January 19, 2016 at Clayton State University Student Activity Center; January 19, 2016 at Decatur Recreation Center; January 21, 2016 at Fulton County Government Center Assembly Hall – for proposed routing and/or adjustments for the following routes: 9, 24, 34,73,86,99, 109,140,141,143 and the discontinuation of 172.

- **Advertisements:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACE III/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and South DeKalb Malls, neighborhood newspapers (North and Mid-DeKalb, North and South Fulton and Northside/Atlanta, GA Asian Times, and social media (Twitter and Facebook).
- **Announcements:** South Fulton Regional Library, South Fulton Government Center, Fairburn Library, Trinity Towers, Morehouse College, College Park Library, College Park City Hall, Fairburn City Hall, Welcome All Recreation Center, Adamsville Recreation Center, Wheat Street Baptist Church, Auburn Neighborhood Senior Center, Peachtree Road United Methodist Church, Peachtree Presbyterian Church, Mount Vernon Presbyterian Church, Elizabeth Baptist Church, Love Center Church, Cascade United Methodist Church, Woods Memorial Baptist Church, New Birth Church, Ray of Hope Church, Chapel Hill Harvester Church, World Changers Church, Mouth Carmel Baptist Church, East Point Mallalieu Church, Greenforest Church, New Pin Grove Baptist Church, Concerned Black Clergy organization, DeKalb County Public Library (21 branches), South DeKalb Legislative Community Cabinet (125 members) and Everest Institute Decatur Campus (150 contacts).
- **Distribution:** Bus and rail station announcements (10,000) and E-mail blasts (6,500), Multicultural Flyers (translated into Korean, Vietnamese and Chinese), and MARTA

high traffic stations (Five Points, Lindbergh, College Park, H.E. Holmes and Kensington).

Topic: Public Hearings on proposed bus service modifications for August 6, 2016 – Public Hearings: May 16, 2016 at Clayton County Government Board Room; May 16, 2016 at Fulton County Government Center Conference Room; May 19, 2016 at Maloof Auditorium, DeKalb County – for proposed routing and/or adjustments for the following routes: 3, 13, 51, 117, 125, 181 and 191.

- **Advertisements:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACE III/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and South DeKalb Malls, neighborhood newspapers (North and Mid-DeKalb, North and South Fulton and Northside/Atlanta, GA Asian Times, and social media (Twitter and Facebook).
- **Announcements:** South Fulton Regional Library, South Fulton Government Center, Fairburn Library, Trinity Towers, Morehouse College, College Park Library, College Park City Hall, Fairburn City Hall, Welcome All Recreation Center, Adamsville Recreation Center, Wheat Street Baptist Church, Auburn Neighborhood Senior Center, Peachtree Road United Methodist Church, Peachtree Presbyterian Church, Mount Vernon Presbyterian Church, Elizabeth Baptist Church, Love Center Church, Cascade United Methodist Church, Woods Memorial Baptist Church, New Birth Church, Ray of Hope Church, Chapel Hill Harvester Church, World Changers Church, Mouth Carmel Baptist Church, East Point Mallalieu Church, Greenforest Church, New Pin Grove Baptist Church, Concerned Black Clergy organization, DeKalb County Public Library (21 branches), South DeKalb Legislative Community Cabinet (125 members) and Everest Institute Decatur Campus (150 contacts).
- **Distribution:** Bus/rail station announcements (100,000) and E-mail blast (6,500); Multicultural Flyers (translated into Korean, Vietnamese and Chinese), MARTA high traffic stations (Five Points, Lindbergh, College Part, H.E. Holmes and Kensington).

Topic: Public Hearings on proposed bus service modifications for December 10, 2016 – Public Hearings: September 19, 2016 at Fulton County Government Center; September 21, 2016 at DeKalb County; September 22, 2016 at Clayton County Government – for proposed routing and/or adjustments for the following routes 2, 16, 33, 34, 47, 67, 102, 114, 123, 191 and 823.

- **Advertisements:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACE III/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and South DeKalb Malls, neighborhood newspapers (North and Mid-DeKalb, North and South Fulton and Northside/Atlanta, GA Asian Times, Multicultural Flyers and social media (Twitter and Facebook).
- **Announcements:** Fulton Regional Library, South Fulton Government Center, Fairburn Library, Trinity Towers, Morehouse College, College Park Library, College Park City Hall, Fairburn City Hall, Welcome All Recreation Center, Adamsville Recreation Center, Wheat Street Baptist Church, Auburn Neighborhood Senior Center, Peachtree Road United Methodist Church, Peachtree Presbyterian Church, Mount Vernon Presbyterian Church, Elizabeth Baptist Church, Love Center Church,

Cascade United Methodist Church, Woods Memorial Baptist Church, New Birth Church, Ray of Hope Church, Chapel Hill Harvester Church, World Changers Church, Mouth Carmel Baptist Church, East Point Mallalieu Church, Greenforest Church, New Pin Grove Baptist Church, Concerned Black Clergy organization, DeKalb County Public Library (21 branches), South DeKalb Legislative Community Cabinet (125 members) and Everest Institute Decatur Campus (150 contacts).

- **Distribution:** Bus/rail station announcements (100,000) and E-mail blast (6,500); Multicultural Flyers (translated into Korean, Vietnamese and Chinese), MARTA high traffic stations (Five Points, Lindbergh, College Park, H.E. Holmes and Kensington).

2017 Public Hearings and Meetings (Exhibit 7-B)

Topics: Public Hearing on the proposed bus service modifications for April 15, 2017 – Public Hearings: January 23, 2017 at Fulton County Assembly Hall; January 24, 2017 at Clayton County Commission Chambers; January 26, 2017 at Maloof Auditorium, DeKalb County – for the proposed routing and/or adjustments for the following routes: 3, 5, 56, 66, 68, 71, 73, 94, 165, 170, 195 and 865.

- **Advertisements:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACE III/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and South DeKalb Malls, neighborhood newspapers (North and Mid-DeKalb, North and South Fulton and Northside/Atlanta, GA Asian Times), Social Media (Facebook and Twitter), Clayton County Government TV, Fulton County Government TV and DeKalb County Government TV.
- **Electronic Notice Distributions:** All 26 Neighborhood Planning Units (NPS) within the City of Atlanta, 63 Senior Centers, Email blast to entire Outreach Database and Email Blast to Government Affairs Database.
- **Flyer Distributions:** Multicultural Flyers (translated into Korean, Vietnamese and Chinese), Chinese Community Center, Dinho Super Market, Vietnamese Market/Buford Highway, Hong Kong Market-Jimmy Carter Blvd., Super H-Market-Doraville/Peachtree Industrial Blvd. & I-285, Happy Valley Restaurant-Jimmy Carter Blvd., Buford Farmers Market Media Distribution Desk, Asian American Resource Center, Gwinnett County, Korean Community Center-Buford Highway, Ho Pin Market Media Table, Atlanta Chinese Community Church, Center for Pan Asian American Community Services.
- **Announcements:** Buses and Rail Stations (100,000), E-mail blast (6,500), South Fulton Regional Library, South Fulton Government Center, Fairburn Library, Trinity Towers, Morehouse College, College Park Library, College Park City Hall, Fairburn City Hall, Welcome All Recreation Center, Adamsville Recreation Center, Wheat Street Baptist Church, Auburn Neighborhood Senior Center, Peachtree Road United Methodist Church, Peachtree Presbyterian Church, Mount Vernon Presbyterian Church, Elizabeth Baptist Church, Love Center Church, Cascade United Methodist Church, Woods Memorial Baptist Church, New Birth Church, Ray of Hope Church, Chapel Hill Harvester Church, World Changers Church, Mouth Carmel Baptist Church, East Point Mallalieu Church, Greenforest Church, New Pin Grove Baptist Church, Concerned Black Clergy organization, DeKalb County Public Library (21 branches), South DeKalb Legislative Community Cabinet (125 members) and Everest Institute Decatur Campus (150 contacts).

Topics: Proposed Bus Modifications for August 5, 2017 – Public hearings: May 16, 2017 at Maloof Auditorium in DeKalb County; May 17, 2017 at Clayton County Commission Chambers; May 18, 2017 at Fulton County Assembly Hall - for the proposed routing and/or adjustments for the following bus routes: 12, 30, 75, 81, 82, 84, 93, 119, 120, 121, 162, 191, 192, 193, 194, 195, 196, 221 and 800.

- **Advertisements:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACE III/Champion newspaper, Mundo Hispanico newspaper (Spanish Version), Cross Roads and South DeKalb Malls, neighborhood newspapers (North and Mid-DeKalb, North and South Fulton and Northside/Atlanta, GA Asian Times) and Social Media (Twitter and Facebook).
- **Flyer Distributions:** Multicultural Flyers (translated into Korean, Vietnamese and Chinese), Chinese Community Center, Dinho Super Market, Vietnamese Market/Buford Highway, Hong Kong Market-Jimmy Carter Blvd., Super H-Market-Doraville/Peachtree Industrial Blvd. & I-285, Happy Valley Restaurant-Jimmy Carter Blvd., Buford Farmers Market Media Distribution Desk, Asian American Resource Center, Gwinnett County, Korean Community Center-Buford Highway, Ho Pin Market Media Table, Atlanta Chinese Community Church and Center for Pan Asian American Community Services.
- **Announcements:** Buses and Rail Stations (100,000), E-mail blast (6,500), South Fulton Regional Library, South Fulton Government Center, Fairburn Library, Trinity Towers, Morehouse College, College Park Library, College Park City Hall, Fairburn City Hall, Welcome All Recreation Center, Adamsville Recreation Center, Wheat Street Baptist Church, Auburn Neighborhood Senior Center, Peachtree Road United Methodist Church, Peachtree Presbyterian Church, Mount Vernon Presbyterian Church, Elizabeth Baptist Church, Love Center Church, Cascade United Methodist Church, Woods Memorial Baptist Church, New Birth Church, Ray of Hope Church, Chapel Hill Harvester Church, World Changers Church, Mouth Carmel Baptist Church, East Point Mallalieu Church, Greenforest Church, New Pin Grove Baptist Church, Concerned Black Clergy organization, DeKalb County Public Library (21 branches), South DeKalb Legislative Community Cabinet (125 members) and Everest Institute Decatur Campus (150 contacts).

Topics: Public Hearing on the proposed Bus Service Modifications (routing or adjustments) – **December 9, 2017** – Public Hearings: September 14, 2017 at Maloof Auditorium, DeKalb County; September 14, 2017 at Fulton County Assembly Hall; September 18, 2017 at Living Waters International Church, Clayton County - for the proposed routing and/or service adjustments for the following routes: 4, 13, 16, 24, 40, 42, 49, 81, 86, 95, 107, 110, 111, 115, 126, 142, 155, 162, 192 and 295.

- **Advertisement:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-Metro section, Atlanta Daily World, Atlanta Inquirer, Atlanta Voice, ACEIII/Champion newspaper, Clayton Daily News, Crossroads & So DeKalb County, Neighbor newspapers, Mundo Hispanico newspaper (Spanish Version), Cross Social media (Twitter and Facebook).
- **Electronic Notice Distribution:** All 26 Neighborhood Planning Units (NPS) within the City of Atlanta, 121 Senior Centers, Email blast to entire Outreach Database.
- **Flyer Distribution:** Chinese Community Center, Dinho Super Market, Vietnamese Market/Buford Highway, Hong Kong Market-Jimmy Carter Blvd., Super H-Market-

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

Topic: MORE MARTA Public Involvement Plan – June – September 2017, - City of Atlanta Expansion & Service improvements: Over 10 In-person events including – Peachtree Center Mall (7/6/17), Piedmont Park Arts Festival (8/19/17), Festival Peachtree Latino (8/27/17), and Atlanta Streets Alive 9/24/17). MARTA Station Kiosks and Farmer's Markets; Speakers Bureau, Neighborhood Planning Units meetings, Neighborhood Associations meetings, MARTA Website, Social Media, public listening sessions, flyer distribution and surveys (in-person & online). MARTA customers, including minority and LEP populations were invited to attend MORE MARTA Public Outreach events.

2018 Public Meeting and Hearings (Exhibit 7-C)

Topic: Public Hearing - Bus Service Modifications for April 14, 2018 – Public Hearings: January 16, 2018 at Decatur Recreation Center; January 30, 2018 at Clayton County Library – HQ's Branch; January 31, 2018 at College Park Safety Complex for the proposed routing and/or adjustments for the following bus routes: 1, 3, 12, 14, 26, 37, 50, 51, 58, 60, 66, 68, 82, 84, 93, 153, 180, 181, 189, 191, 813, 850, 853 and 867.

- **Advertisement:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-Metro section, ACEIII/Champion newspaper, Clayton Daily News, Crossroads & South DeKalb County, Neighbor Newspapers, Mundo Hispanico newspaper (Spanish Version), Social media (Twitter and Facebook) and Outreach Email Database (400+).
- **Flyer Distribution:** Chinese Community Center, Dinho Super Market, Vietnamese Market/Buford Highway, Hong Kong Market-Jimmy Carter Blvd., Super H-Market-Doraville/Peachtree Industrial Blvd. & I-285, Happy Valley Restaurant-Jimmy Carter Blvd., Buford Farmers Market Media Distribution Desk, Asian American Resource Center Gwinnett County, Korean Community Center-Buford Highway, Ho Pin Market Media Table, Atlanta Chinese Community Church, Center for Pan Asian American Community Services, City of Atlanta Neighborhood Planning Units (26), Senior Centers (133) and Station Outreach at HE Holmes, College Park, Bankhead, and East Point (8000+).

Topic: Public Hearing - Bus Service Modifications for August 18, 2018 – Community Exchange Meetings: May 8, 2018 at Clayton County Police Precinct; May 10, 2018 at Cedar Grove Elementary School; May 19, 2018 at MARTA Headquarters. Public Hearings: May 14, 2018 at Clayton County Board Room; May 15, 2018 at Fulton County Government Center; May 16, 2018 at DeKalb Maloof Auditorium for proposed routing and/or adjustments for the following bus routes: 6, 9, 15, 21, 25, 27, 30, 32, 49, 74, 107, 110, 133, 195, 809, 816, 825, 832 and 899.

- **Advertisement:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-Metro section, ACEIII/Champion newspaper, Clayton Daily News, Crossroads & South DeKalb County, Neighbor Newspapers, Mundo Hispanico newspaper (Spanish Version), Social media (Twitter and Facebook) Outreach Email Database (400+).

- **Flyer Distribution:** Chinese Community Center, Dinho Super Market, Vietnamese Market/Buford Highway, Hong Kong Market-Jimmy Carter Blvd., Super H-Market-Doraville/Peachtree Industrial Blvd. & I-285, Happy Valley Restaurant-Jimmy Carter Blvd., Buford Farmers Market Media Distribution Desk, Asian American Resource Center Gwinnett County, Korean Community Center-Buford Highway, Ho Pin Market Media Table, Atlanta Chinese Community Church, Center for Pan Asian American Community Services, City of Atlanta Neighborhood Planning Units (26), Senior Centers (133), mailed notices (800+) and Station Outreach at Lindbergh, Chamblee, King Memorial, Arts Center, Inman Park and Georgia State.

Topic: Public Hearing - Bus Service Modifications for December 8, 2018 – Public Hearings: September 17, 2018 at Fulton County Government Center; September 18, 2018 at Clayton County Water Authority; September 19, 2018 at DeKalb Maloof Auditorium for proposed routing and/or adjustments for the following bus routes: 79, 82, 89, 95, 143, 172 and 178.

- **Advertisement:** MARTA Website, TTN/TRN (MARTA on board video), signpost, Atlanta Journal Constitution newspaper-Metro section, ACEIII/Champion newspaper, Clayton Daily News, Crossroads & South DeKalb County, Neighbor Newspapers, Mundo Hispanico newspaper (Spanish Version), Social media (Twitter and Facebook) and Outreach Email Database (500+).
- **Flyer Distribution:** Chinese Community Center, Dinho Super Market, Vietnamese Market/Buford Highway, Hong Kong Market-Jimmy Carter Blvd., Super H-Market-Doraville/Peachtree Industrial Blvd. & I-285, Happy Valley Restaurant-Jimmy Carter Blvd., Buford Farmers Market Media Distribution Desk, Asian American Resource Center, Gwinnett County, Korean Community Center-Buford Highway, Ho Pin Market Media Table, Atlanta Chinese Community Church, Center for Pan Asian American Community Services, City of Atlanta Neighborhood Planning Units (26), Senior Centers (Trinity Towers & Lakewood Christian Manor) and Station Outreach at College Park, East Point, Lakewood/Fort McPherson, Oakland City West End.

MARTA envisioned that LEP communities (i.e., Hispanic, Chinese, Korean, and Vietnamese) would require special outreach, in relation to community forums and public hearings. Therefore, MARTA provided and/or acquired translators and announcements in alternative formats to ensure that information was properly conveyed to respective LEP populations. In addition, MARTA advertised the hearings in Spanish, Chinese, Korean and Vietnamese (**Exhibit 8**).

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 9**). 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 2014 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 is able to identify the LEP persons’ native language, how successful MARTA has been in communicating with LEP persons, and common questions directed to MARTA by LEP persons. MARTA 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 Services By Language - The top spoken languages listed in MARTA’s 2014 LEP Plan, in the Atlanta metropolitan area, other than English, are 1) Spanish, 2) Korean,

3) Vietnamese and 4) Chinese.² There are a variety of ways in which MARTA provides language assistance service to the above population. MARTA hired bi-lingual employees; created an employee language bank; 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 a number of language assistance services, including, but not limited to:

Oral Translations

- Recruited and hired bilingual employees.
- LEP customers who call MARTA Call Center have direct access to bilingual customer service representatives and can be connected to a telephonic interpretation service with linguists who speak over 200 languages.
- MARTA has a limited Language Resource Bank comprised of bilingual and multilingual represented and non-represented employees. Employees are called upon to volunteer their time and act as interpreters for MARTA at special events, public meetings and public hearings. Additionally, employees assist with the translation of simple documents, record bilingual public announcements or assist in emergency situations where bilingual communication is required.
- MARTA has produced a “How to Ride MARTA” presentation in English and four other languages: Spanish, Chinese, Korean and Japanese. These are posted on the MARTA website and also distributed to community-based organizations (CBOs) that serve low income, minority and LEP populations upon request.
- Selected rail system-wide announcements are made in English and Spanish. The majority of bus announcements are made in English and Spanish.
- Some front-line staff use visual translation cards and other tools to communicate with individuals with limited English proficiency.
- MARTA plans to use browse Aloud software to address difficulties people with literacy and visual impairments may encounter when attempting to read large amounts of small text on screen on MARTA’s website. Browse Aloud makes using the Internet easier for people who have low literacy and reading skills, English as a second language, dyslexia and mild visual impairments.

Written Translations

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

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

MARTA has established language access for LEP populations through key departments, in terms of the nature and importance of services, programs or activities, which link to the general public. Each of these key departments has standard operating procedures in place to provide language assistance services for LEP persons who do not speak English as their primary language or who may have a limited ability to read, write or understand English. As central resources for these departments, and MARTA in general, MARTA has 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 170 languages including, but not limited to, Spanish, language dialects from India, Korean, Chinese, Vietnamese, language dialects from Africa including Swahili, Arabic, French, and German. Under a contract with the Georgia Department of Human Resources, Georgia agencies are allowed to utilize its contract with the Language Line to secure volume price advantages. Invoices are sent from Language Line Services to MARTA's Information Technology Department (IT) on a monthly basis.

Police 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 speak Spanish, language dialects from India, Korea, Chinese, Vietnamese, Spanish, and language dialects from Africa. If an officer speaks only English, and the other person speaks only their native language, the communication problem is obvious. This General Order describes how MARTA can use a translation service provided by the Language Line Services.

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

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

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

Customer 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 in Spanish, Korean, Vietnamese, Chinese and African Languages, 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 is issued, procedures developed and staff trained to deploy this added convenience for MARTA's non-English speaking customers. The use of a translation service supplements the availability of Spanish-speaking staff already hired and working within the call centers.

The process is as follows:

- MARTA customer calls the main telephone number (404) 848-5000.
- Customer is given a prompt option to select # 1 for English or #2 for Spanish and other languages.
- Selecting option #2 directs customers to a menu tree that is recorded in Spanish.
- Spanish/other language calls are routed to a Spanish-speaking representative in the respective call center. This telephone call is channeled to the representative as a priority call, so that once the representative completes the current call, the very next call would be this call that requires assistance to communicate.
- The telephone screen display notifies the representative that the caller is in need of language support allowing the representative to greet the caller in Spanish.
- The call center representative converses with the caller and, if needed, utilizes the language interpretation service.
- To communicate in any other language other than Spanish, a conference call is made to the translation service; 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 including Spanish, Korean, Vietnamese, Chinese and multiple African 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, Korean, Vietnamese, Chinese and multiple African languages. As reflected in the Public Hearing Policy and Procedures and updated Community Outreach Procedures, flyers are used to announce public meetings and are placed on the MARTA website in multiple languages including: Spanish, Korean, Vietnamese and Chinese. Flyers are also distributed to various locations in the Asian Community. Critical information on the bus and rail schedules are in English and Spanish and information advising individuals on how to obtain information in additional languages is also written on MARTA schedules and publications. Further alternative language translation services

for the MARTA website is available, through Google Translation, in multiple languages including: Spanish, Korean, Chinese, Japanese, French and German.

Diversity and Inclusion (D&I) - D&I staff are advised of the process to access the language assistance services during their orientation period with their immediate supervisor. Before referring the caller to another office, D&I staff should utilize available bilingual staff whenever possible, to assist with requests from MARTA's LEP population. If no available and appropriate bilingual staff member is present, the 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 404-848-2244 or 404-848-5290 so that the appropriate Customer Service Representative may assist the caller.

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

Education and Access - Title VI-related educational efforts are implemented on a regular basis. For example, 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 (i.e., Korean, Russian, Spanish and English). 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:

- Soccer in the Streets – Five Points Station (October 27, 2016)
- Forest Park Community Center (February 2, 2017)
- Rosel Fann Recreation Center (March 7, 2017)
- The Agape Community Center (March 8, 2017)
- Helene Mills Center (March 8, 2017)
- Cascade United Methodist Church (March 21, 2017)
- Cathedral of St. Phillips (March 22, 2017)
- Big Bethel AME (March 23, 2017)
- Earth Day Celebration (April 21, 2017)
- Atlanta Tribune Summit (April 26, 2017)
- MARTA Relay Bike Launch (July 14, 2017)
- Piedmont Park Arts Festival (August 17, 2017)
- Festival Peachtree Latino (August 20, 2017)
- Atlanta Streets Alive (September 24, 2017)
- New Bus Launch Customer Event (February 9, 2018)
- Diversity Partnership Day (October 31, 2018)

Neighborhood Planning Unit (NPU)³ Outreach Meetings were conducted for:

- NPU – F
- NPU - G
- NPU - H
- NPU - I
- NPU - J
- NPU – K
- NPU - N
- NPU – P
- NPU – Q
- NPU - R
- NPU -S
- NPU - T
- NPU - V
- NPU - W
- NPU - X

D&I also conducted cultural celebrations including:

- 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.
- National Black History Month: In celebration, D&I showcased posters identifying African Americans and their contributions.

Active community organization memberships include:

- Georgia Hispanic Chamber of Commerce
- Georgia Hispanic Construction Association
- NAACP-Atlanta Chapter

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
- Georgia Black Chamber of Commerce
- Latin American Association
- National Diversity Council
- National Association of African Americans in HR

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

- Who's Who in Asian American Communities

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 of Directors Total Membership is 15	American Indian or Alaska Native	Asian	Black or African American	Caucasian/ White	Hispanic or Latino	Native Hawaiian or Other Pacific Islander
Percentages	0	0	40%	60%	0	0
Members	0	0	6	9	0	0

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 four monthly standing committee meetings and a full Board meeting:

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

MARTA's Accessibility Committee (MAC) formerly known as the Elderly Disabled Access Advisory Committee (EDAAC) 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 (currently 1 vacancy). 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:

MAC Body Total Membership is 12	American Indian or Alaska Native	Asian	Black or African American	Caucasian/ White	Hispanic or Latino	Native Hawaiian or Other Pacific Islander
Percentages	0	0	33.3%	58.4%	8.3%	0

Members	0	0	4	7	1	0
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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.

Sub-recipient Assistance and Monitoring - As outlined under Title 49 CFR, Section 21.9(b) and FTA Circular 4702.1B, Chapter III, Parts 11 and 12, MARTA provided assistance and monitored its sub-recipients. During the period of this Title VI Program submission, MARTA identified two sub-recipients: DeKalb and Cobb Counties.

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 (**Exhibit 10**). Cobb County, although a sub-recipient, is also a direct grant recipient that directly submits a Title VI Program to the FTA.

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 complaints against sub-recipient DeKalb County since the last Title VI Program plan was submitted in 2016. 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 11**);
- Developing an initial and quarterly checklist to ensure and monitor sub-recipient compliance with Title VI (**Exhibits 12-A and 12-B**);
- Conducting site visits for the sub-recipients that MARTA was required to monitor (**Exhibit 13-A and 13-B**);
- Requiring sub-recipients to attend a 4-hour mandatory comprehensive compliance training on Title VI, Environmental Justice; EEO, ADA and DBE (**Exhibit 14**).

Determination of Site Locations, New Starts, or Facilities - MARTA currently has no 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 the Environmental Analysis stages. 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's project summary list for the FY18-23 TIP is included (**Exhibit 15**). During this Plan period, the MARTA Office of Transit System Planning (TSP) completed an Environmental Justice Analysis and/or utilized Environmental Justice principles in the transportation planning process as reflected in the following major projects:

- **The Clifton Corridor** - Between 2009 and 2012, MARTA and the Clifton Corridor Transportation Management Association (CCTMA) partnered to conduct the Clifton Corridor Transit Initiative-Alternatives Analysis (AA). The Clifton Corridor AA involved investigating the need for high-capacity transit connections between the MARTA Lindbergh Center/Armour Yard area in north-central Atlanta and the Clifton Road employment centers and the City of Decatur in west-central DeKalb County. The Clifton Corridor includes some of the largest activity centers in metro Atlanta without convenient access to the existing interstate and system or MARTA rail system. These conditions have resulted in high levels of traffic congestion on a severely limited network of roadways. A Locally Preferred Alternative (LPA) was adopted by the MARTA Board of Directors in April 2012. The LPA encompassed 8.8 miles of new light rail service from the MARTA Lindbergh Center Station to Avondale MARTA Station and includes operations adjacent to the CSX right-of-way. The LPA also includes in-street operations within the medians of Clifton Road (through the CDC/Emory area), Scott Boulevard, North Decatur Road, DeKalb Industrial Way and North Arcadia Avenue. Currently the project is in the environmental review phase, and is actually connected to the More MARTA project as further described below. Project Development and Final Design phases would follow and construction is not expected before 2030.
- **I-20 East Corridor** - The I-20 East Transit Initiative was undertaken by MARTA to identify transit investments that would improve east-west mobility between downtown Atlanta and eastern DeKalb County. Specifically, investigating accessibility to jobs and housing within the corridor, the provision of convenient and efficient transit service to accommodate the increasing transit demands within the corridor, and the support of corridor economic development and revitalization. A Detailed Corridor Analysis (DCA) has been completed to help identify the best transit solution, also known as the Locally Preferred Alternative (LPA) for the corridor.

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

Since the Fall of 2012, MARTA has been conducting an environmental review of each component of the project. An Environmental Assessment (EA) is being prepared for the BRT component and an Environmental Impact Statement (EIS) is being prepared for the HRT component. As required by NEPA, low-income and minority populations within the study area affected by the project have been identified, as well as potential positive and adverse impacts and mitigation and environmental enhancement actions to address any

adverse impacts. Currently, the project is temporarily on hold while awaiting the Dekalb County Transit Master Plan, expected to be completed in 2019.

- **The GA 400 Corridor Transit Initiative-Connect 400** - The Connect 400–Alternatives Analysis (AA) was launched in late 2011 and involves an 18-month study to identify a potential high-capacity transit solution within a study area that extends approximately 12 miles along GA 400 from the existing MARTA North Springs station in Sandy Springs, which currently serves as the northern terminus of the MARTA Red Line, northward to Windward Parkway.

At the conclusion of the AA, the GA 400 right-of-way (ROW) from the North Springs station to Windward Parkway emerged as the preferred alignment, a distance of about 12 miles. The transit technologies evaluated included: heavy rail transit, bus rapid transit and light rail transit. Additional technical, public and stakeholder input received during Early Scoping conducted in 2013 and 2014 established the basis for the selection of the Locally Preferred Alternative (LPA) for the GA 400 Corridor.

The LPA was adopted by the MARTA Board of Directors in March 2015 and consists of rail extension of the existing MARTA Red Line that would cross to the west side of GA 400 north of the North Springs Station and south of Spalding Drive; the alternative would cross back to the east side of GA 400 north of the Chattahoochee River.

Two lower cost BRT alternatives are also under consideration and will be studied in the Draft Environmental Impact Statement (DEIS). LRT was eliminated from further consideration as a result of stakeholder input, poor performance during technical studies, and its limited potential to secure Federal funding through Federal Transit Administration's (FTA) New Starts capital grant program. MARTA has initiated scoping, as required by the National Environmental Policy Act of 1969 (NEPA), and began performing environmental analysis of the project in Spring 2015.

MARTA completed the DEIS in 2017, and has presented it for public review. MARTA is currently preparing Final Environmental Impact Statement and awaiting FTA's signing of Record of Decision (ROD).

- **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 expand 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 centers. Major projects in current development stages: Beltline Corridor in environmental review stage; Clifton Corridor in the environmental review stage; and Campbellton Road 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.
- **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. Plans for Armour Yard, Avondale, Browns Mill, Hamilton, Laredo, and Perry were last updated, revised and implemented in FY 2016 to name and provide contact information for a new Environmental Health & Safety Coordinator. With major changes and improvements at Brady, plan updates were required in FY17. The updates included new posters and permits with the new responsible person's name and contact information.

All bus and rail maintenance facilities are subject to the storm water permit and industrial wastewater permit requirements of the Clean Water Act, Georgia 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.

The National Pollutant Discharge Elimination System (NPDES) permit and SWPPP for the bus and rail maintenance facilities require quarterly visual and facility inspections, and annual reporting to Georgia Environmental Protection Division (GA EPD). Samples and inspections are conducted quarterly and documentation prepared and included in the facility's SWPPP. Annually, comprehensive site inspections are conducted and reported to GA EPD as a requirement of the permit.

Annual training is required for storm water prevention, spill response, and wastewater discharges for all bus and rail maintenance facilities. As the regulatory requirements and facility improvements occur, the training materials must be updated to reflect these changes.

The pollution prevention programs are required to undergo regulatory updates annually, specifically as they relate to facility upgrades with respect to train and bus wash improvements, addition of new bulk fluids and material, and changes in chemical storage regulations. Although, the SWPPP/SPCC plans are updated within five-year cycles, plan updates are required when there are changes in regulations, environmental permits are renewed, or facility upgrades occur.

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

IV. FIXED ROUTE TRANSIT PROVIDERS

System-wide Service Standards - The 2019 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 16**). The most recent Service Standards (FY 2019) were based on FTA Circular 4702.1B, which was the current circular at the time that the Service Standards were approved by the MARTA Board. These Service Standards are made available upon request from the Office of Transit Systems Planning.

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

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

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

Utilizing a fleet of **565** buses, **338** rail cars and **211** Para-transit vans, with **445** fixed route vehicles in peak service, 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: 82 or more riders exceed the maximum load factor
- A 40-foot, 37 seat bus: 57 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: 39 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 45 minutes or less. Weekday off-peak and weekend service will maintain headways of 75 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.....45 minutes or less
- Weekday off-peak /Weekends.....75 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 Morning..... before 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 Schedule Adherence Standards: Schedule Adherence Standards provide the tools for evaluating the on-time performance of individual MARTA routes. Passengers using high-frequency services are generally more interested in regular, even headways than in strict adherence to published timetables, whereas passengers on less frequent services expect arrivals/departures to occur as published, and customers generally time their arrival at bus stops to correspond with the specific scheduled departure times. Scheduling staff analyzes reports that present average travel times between time points utilizing AVL' data to evaluate schedule reliability. During the development of schedules, these reports will be used to address any run time deficiencies that are found in the new schedule. The Schedule Adherence Standards for bus routes are designed to ensure that routes operate as reliably as possible without early departures, chronic delays, or unpredictable wait and/or travel times.

Bus Route Test: The Bus Schedule Adherence Standard determines whether or not a route is on time, based on the proportion of time points on the routes that are on time over the entire service day. 78.5% of all departure times on the route over the entire service day must pass their on-time tests to be in compliance. As service is analyzed, Scheduling staff endeavor to improve the on-time-performance beyond the baseline service standards. The review includes an analysis of the cost versus the benefit of any route modification.

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

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 as follows:

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

Performance thresholds for these standards are determined tri-annually based on comparison of any given route to similar service. The performance measures discussed under *Route Productivity* are calculated for the entire system and then organized by type of service. The measures of performance will be calculated separately for Core; Lifeline; Supporting Local; Peak Hour Only; and Small Vehicle Service. If a route is categorized as a 'Core' route it will be compared against the average of the other 'Core' 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. See **(Exhibit 17)** for bus vehicle assignment by garage, fuel type, size and age of the fleet.

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 Morning..... before 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 Rail Fleet Management Plan is attached as **(Exhibit 18)**.

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 does not follow a set schedule, with set timepoints at different stations. Instead, headways are set at 10-15 minutes for all service times. This will be evaluated over the next year to assess the headways for streetcar service during peak and off-peak hours.

Streetcar Span of Service Hours - Streetcar span of service hours are defined by day of the week as follows:

- Monday through Thursday 6:00 a.m. to 11:00 p.m.
- Friday 6:00 a.m. to 1:00 a.m.
- Saturday 8:15 a.m. to 1:00 a.m.
- Sunday 8:15 a.m. to 11:00 p.m.

Due to the fact that this is MARTA's first year operating the streetcar, ridership and productivity will be measured over Fiscal Year 2019 to assess the span of service.

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 Monitoring - For both bus and rail modes, annual reviews, including MARTA Board approval of the Service Standards and Board approval of major service changes/modifications, allow MARTA to assess the efficiency and cost effectiveness of services which are provided to the public (**See Exhibit 19**). In addition, adherence to these standards ensures the highest quality of MARTA services and transit system access to every individual regardless of their race, color or national origin by:

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

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

In addition to the Service Standards, MARTA's Office of Transit System Planning also monitors bus transit through the creation of Bus Route Service Profiles which are updated and published three times each year. The 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.

Collecting and Reporting Demographic Data - Demographic and Service Profile Maps - During the tri-annual Title VI Program reporting period, MARTA collected demographic data, including Demographic and Service Profile Maps and Charts, in order to determine the extent to which members of minority groups are beneficiaries of MARTA programs, and are effected prior to any proposed service reductions or eliminations. (**Exhibit 20A-20E**).

As required under Circular 4702.1B, MARTA updated its demographic and service profile maps using 2013 -2017 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 20-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 20-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 20-C**).
4. A map overlaying minority populations with fixed transit facilities, such as bus shelters, transit stations, and fixed guideways. This map shows all layers from the base map, plus a layer of bus shelter locations, with an overlay of minority census block groups that exceed the service area average. The information on this map is used to monitor the equitable distribution of bus shelters and other passenger amenities (**Exhibit 20-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 20-E**).

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

As part of their data collection process, R&A conducts an annual Quality of Service survey with several thousands of respondents each year (**Exhibit 21A-C**). 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 and ancestry/national origin. 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 FY18 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 5,847 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 FY2018. 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 FY18 Quality of Service demographic information on the following:

- Age
- Education
- Race
- Ethnicity (Hispanic, Not Hispanic)
- Household income
- How many people in household
- How many children in household
- Modes of transit used
- Fare payment method

Information on languages spoken at home and comparative analyses appear in sections following the tables below.

Race

Race	FY18 %*
Black	69.5%
White	17.9%

American Indian / Alaska Native	.7%
Asian Indian	4.1%
Chinese	0.7%
Japanese	0.2%
Vietnamese	0.2%
Korean	0.3%
Other Asian	0.3%
Other	8.8%
* Percentages sum to more than 100% because multiple responses were allowed.	

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

Ethnicity*	FY15 %
Not Spanish Hispanic Latino	90.5%
Spanish Hispanic Latino	9.5%
Total	100%
<small>* Respondents were asked whether they were Hispanic or Latino in a question separate from race.</small>	

English Language Proficiency - Transit Research utilizes the I-Speak card so that respondents who cannot speak English can point out to the interviewer which is their native language. Some riders with limited English proficiency would not acknowledge the fact that they were LEP and refused to identify the language they speak. Research and Analysis noticed the difficulty of collecting this important information. Therefore, Research and Analysis has also tracked non-verbal refusals, and refusals to select language.

Annual Household Income

Income Range	Percent
Under \$10,000	14.6%
\$10,000-19,999	18.0%
\$20,000-29,999	13.8%
\$30,000-39,999	16.3%
\$40,000-49,999	9.0%
\$50,000-74,999	11.0%
\$75,000 and Over	17.3%
Total	100%

Language Spoken at Home - In order to comply with FTA Circular 4702.1B, Research and Analysis added a question to the FY14 survey to ascertain which languages other than English are spoken in the respondent's 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 U.S. Census American Community Survey can be found in the MARTA LEP Plan.

Travel Patterns of Riders/Usual Mode of Travel

Mode	Percent
Rail Only	26.3%
Bus Only	2.5%
Bus & Rail	71.2%
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 variables household income, trip patterns, trips taken and fare payment method. This information is used to support the fare equity analysis that will be discussed in detail in a separate section.

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

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

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	16.2% B	7.5%
\$10,000 to \$14,999	8.9%	8.4%

\$15,000 to \$19,999	10.0% B	6.2%
\$20,000 to \$24,999	7.7% B	4.0%
\$25,000 to \$29,999	7.6% B	3.1%
\$30,000 to \$34,999	8.5% B	4.2%
\$35,000 to \$39,999	9.9% B	4.1%
\$40,000 to \$49,999	9.1%	7.6%
\$50,000 to \$74,999	9.8%	16.5% A
\$75,000 to \$99,999	8.5%	18.3% A
\$100,000 to \$149,999	2.4%	11.8% A
\$150,000 to \$199,999	0.8%	3.5% A
\$200,000 or more	0.7%	4.8% A
Median Income Category	\$25,000- 29,999	\$50,000- 74,999
Results are based on two-sided tests. For each significant pair, the key of the category with the smaller column proportion appears in the category with the larger column proportion. Significance level for upper case letters (A,B,C) =.05.		

Comparison of Mode Usage – Minorities vs. Non-Minorities

Mode	Minorities	Non-Minorities
Rail Only	19.3%	60.6% A
Bus Only	2.4%	1.6%
Bus & Rail	78.3% B	37.9%
Results are based on two-sided tests. For each significant pair, the key of the category with the smaller column proportion appears in the category with the larger column proportion. Significance level for upper case letters (A,B,C) =.05.		

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

Fare Payment Method	Minorities	Non-Minorities
Cash on bus	7.1% B	0.7% _{bb}
Regular 30-day Breeze Pass	15.9%	25.7% A
1-7 day Breeze Pass	36.1% B	12.6%
Breeze Card with Specific Number of Trips	17.6%	33.7% A
Breeze Card with Stored Value	11.6%	11.0%
Half-Fare Breeze Card	6.7% B	3.9%
Mobility Breeze Card	0.5%	0.6%
Year Pass from Employer	4.3%	11.2% A
Other	0.2%	0.4%

Results are based on two-sided tests. For each significant pair, the key of the category with the smaller column proportion appears in the category with the larger column proportion. Significance level for upper case letters (A,B,C) =.05.

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

Trips Per Week	Minorities	Non-Minorities
Light (0-4 per week)	16.7%	25.2% A
Moderate (5-8 per week)	15.3%	20.3% A
Heavy (9 or more per week)	68.0% B	54.4% ^{bb}
Mean	10.1 B	8.6

Results are based on two-sided tests. For each significant pair, the key of the category with the smaller column proportion appears in the category with the larger column proportion. Significance level for upper case letters (A,B,C) =.05.

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

Fare Payment Method	Low Income (<= Poverty Level)	Medium or High Income (>Poverty Level)
Cash on bus	8.9% B	2.8%
Regular 30-day Breeze Pass	15.3%	18.6%
1-7 day Breeze Pass	39.8% B	31.4%
Breeze Card with Specific Number of Trips	16.5%	21.1% A
Breeze Card with Stored Value	9.2%	13.2% A
Half-Fare Breeze Card	6.6% B	3.6%
Mobility Breeze Card	1.2% B	0.1%
Year Pass from Employer	2.4% B	9.1% A
Other	0.0%	0.2%
Income Group Percent of Sample	31.6%	68.4%

Results are based on two-sided tests. For each significant pair, the key of the category with the smaller column proportion appears in the category with the larger column proportion. Significance level for upper case letters (A,B,C) =.05.

Title VI Fare and Service Policies:

Major Service Change Policy - 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 **(Exhibit 23)**:

- 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 considered.

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 every 4 months, proposed changes were screened and implemented. A service equity analysis was completed on all proposed changes that met the "major service" threshold (**Exhibit 22**). Based on public input during the numerous public hearing and community engagements; MARTA modified the proposed changes to eliminate any disparate impacts or disproportionate burdens that the service equity analysis revealed.

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 24**):

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 - In order 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 boardings 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 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 (**Exhibit 21**) 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.

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

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

- Ridership
 - Ridership for a bench: 15 boardings per day
 - Ridership for a shelter: 40 boardings per day
- Bus stop level of service (span of service, average trip frequency)
- Proximity to other shelters
- Equity - Title VI Compliance
 - Existing bench or shelter locations will be considered for equity in distribution within the service area.
- Local land use – proximity to Lifeline facilities such as senior centers, hospitals, government offices, etc.

Since advertising displays may not be conducive to all locations where shelter demand exists, the MARTA bus shelter contract allows the placement of 10 shelters without advertising each year. Additionally, the scoring mechanism above addresses the need for equitable shelter placement. MARTA will review shelter placement to ensure equity throughout the service area, regardless of advertising status.

Shelter locations will also be evaluated based on input from customers and staff through the Bus Stop Request Form on www.itsmarta.com and on requests received by Customer Services.

All proposed shelter or bench locations will have a field evaluation for viability. The following factors are considered in field evaluation:

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

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

Rail Station Amenities - All MARTA rail stations will contain:

- Passenger information case with a system map and individual route schedules that service that particular station.
- Trash receptacles.
- Emergency phones to contact MARTA Police in case of an emergency.
- Electronic Sign Posts providing traveler information, including arrival time of next train and advertisement.
- Breeze Card Vending Machines for passengers to purchase fares.
- ADA Accessible Platforms.
- Other amenities will be distributed equitably throughout the MARTA service area

Vehicle Amenities – MARTA Buses and Rail Cars will contain:

- The Rail Network – Television-type displays placed on MARTA rail cars. The Rail Network displays offer news, MARTA marketing information, advertising, and radio channels for passengers.
- Bike Racks – All buses in MARTA's fixed-route vehicle fleet are outfitted with fold-down bicycle racks capable of holding 2 bikes.
- Automated Announcement Systems
- Fare boxes on buses
- Wi Fi