TITLE VI PROGRAM

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Placeholder for signed resolution from SRTA Board of Directors
1. General Requirements and Guidelines

The State Road and Tollway Authority (SRTA) is a Federal Transit Administration (FTA) grant recipient and has adopted this Title VI Program to ensure that transit services are provided in a nondiscriminatory manner. SRTA’s Title VI Program follows the requirements of FTA C 4702.1B dated October 1, 2012 which require that all grantees implement the General Requirements and Guidelines as established in Chapter III of the Circular. Grantees that operate more than fifty buses in fixed route service are also required to implement the provisions of Chapter IV of the Circular.

The SRTA Board is established by Georgia statute. Board membership is made up of the Governor who serves as the Chair, Director of Planning and Budget (OPB), the Georgia Department of Transportation Commissioner (GDOT), Lt. Governor appointee, and Speaker of the House appointee.

A. Statement of Policy

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

SRTA is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI. It is the policy of the SRTA that all contractors, subcontractors and subgrantees shall adopt a Title VI policy and shall implement procedures to ensure that SRTA’s services are provided without discrimination on the basis of race, color, or national origin.

B. Notice to Public

SRTA’s Statement of Policy shall be published on the SRTA and Xpress websites and posted in the Xpress Customer Service area, on each floor of SRTA headquarters, at each SRTA owned park and ride facility, and on all buses operated in SRTA’s services. A copy of the Statement of Policy is included in Appendix A of this document.

C. Title VI Complaint Procedures and Forms

SRTA has adopted the Title VI Complaint Procedures and Forms which are included in Appendix B.

D. Title VI Investigations, Complaints, and Lawsuits

i. Background

In order to fulfil FTA’s requirement to record and report transit-related Title VI investigations, complaints, and lawsuits, SRTA prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA
- Lawsuits, and
- Complaints naming the recipient.
These investigations, complaints, and lawsuits are prepared, logged, and maintained by SRTA’s Title VI Coordinator.

The following entries record events since the approval of the last SRTA Title VI Program through December of 2019. Each entry will have a subsequent chart that details:

- Date that the transit-related Title VI investigation, lawsuit, or complaint was filed
- Complainant identifier linked to a name for internal records
- Summary of the Allegation(s)
- Actions taken by the recipient in response or final findings related to the investigation, lawsuit, or complaint
- Status of the Investigation, lawsuit, or complaint.

ii. Current Investigations, Complaints, and Lawsuits

1. Active investigations conducted by FTA and entities other than FTA:
   SRTA has had no investigations conducted by FTA or entities other than FTA that have found SRTA to be in noncompliance with any civil rights requirements.

2. Lawsuits:
   SRTA does not have any lawsuits that allege discrimination on the basis of race, color, or national origin.

3. Complaints naming the recipient:
   SRTA has had two (2) complainants file Title VI complaint forms. The details of those complaints are detailed below:

   Table 1: Complaint #1

<table>
<thead>
<tr>
<th>Complaint #1</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date filed</td>
<td>10/11/2019</td>
<td>Complainant A</td>
</tr>
<tr>
<td>Complainant Name</td>
<td>Complainant A</td>
<td></td>
</tr>
<tr>
<td>Summary of Allegation(s)</td>
<td>Complainant A sent a Title VI complaint to the SRTA Title VI email alleging discrimination due to poor air quality. Parker Martin, SRTA Title VI Officer, spoke with Complainant A over the phone to collect more information about the nature of the complaint and any role that the agency has in his complaint. Based on the conversation, it was determined that Complainant A was concerned about poor air quality stemming from the nearby airport and industrial uses and was enquiring about programs to better support the community he resides. Parker Martin mentioned the roles and purposes of SRTAs transit and tolling programs that have an emphasis on reducing local vehicular emissions and improving air quality in the region. Parker Martin directed Complainant A to the Xpress/Peach Pass customer service for any information on how he can ride Xpress or obtain a Peach Pass. Parker Martin also provided Complainant A with contact information for the Georgia Environmental...</td>
<td></td>
</tr>
</tbody>
</table>
SRTA Title VI Program, January 2020

Table 2: Complaint #B

| Actions taken by the recipient in response to final findings | Civil Rights Officer, Parker Martin, spoke with Complainant A on 12/6/2019 and determined that Complainant A’s concerns were not with the transit programs of SRTA but rather poor air quality from other sources near his home. Parker Martin provided Complainant A with information on how to contact GA EPD for his air quality concerns. |
| Status of the investigation, lawsuit, or complaint | Open; Pending final report |

Complaint #2

| Date filed | 10/29/2019 |
| Complainant Name | Complainant B |
| Summary of Allegation(s) | Complainant B sent an email to the SRTA Title VI email account with a complaint form detailing examples of harassment she, and other riders, experienced onboard Xpress buses. Complainant B alleges that two men on the buses made racially insensitive jokes and made her feel uncomfortable as a person of color. Over a period of several days, Complainant B alleges the passenger continued to make racially insensitive remarks directed at her and other women of color onboard. Complainant B eventually stopped riding the bus. |
| Actions taken by the recipient in response to final findings | Civil Rights Officer Parker Martin spoke with Complainant B on 11/25/2019 and is working with Xpress Operations to gather more information from bus drivers and onboard cameras. |
| Status of the investigation, lawsuit, or complaint | Open; pending more information from operations |

E. Public Participation Plan

SRTA has developed a Public Participation Plan that includes an outreach plan to engage minority and limited English proficient populations. SRTA’s Public Participation Plan is included in Appendix F.

F. Limited English Proficiency Access Plan


SRTA’s Limited English Proficiency Access Plan is included in Appendix G.
G. SRTA Board Structure
The SRTA Board is established by Georgia statute, board membership is made up of elected and appointed officials. The membership includes the Governor who serves as the Chair, Director of Planning and Budget (OPB), the Georgia Department of Transportation Commissioner (GDOT), Lt. Governor appointee, and Speaker of the House appointee. As December 2019, there are no vacant seats and the racial breakdown is as follows:

Table 3: SRTA Board Structure

<table>
<thead>
<tr>
<th></th>
<th>Caucasian</th>
<th>African American</th>
<th>Asian/Indian American</th>
<th>Native American/Alaskan</th>
<th>Pacific Islander</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>SRTA Board of Directors</td>
<td>4</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>80.00%</td>
<td>0.00%</td>
<td>20.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>100.00%</td>
</tr>
</tbody>
</table>

H. Subrecipient Assistance and Monitoring
As of December 2019, SRTA does not have any FTA subrecipients. If subrecipients are established, SRTA will notify subrecipients of their responsibilities and require the submittal of information from subrecipients to ensure compliance with Title VI Program submittal requirements, public participation, and other required documentation. SRTA will maintain these records electronically and review the submittals for compliance purposes prior to the submittal of SRTA’s Title VI Program.

I. Transit Facility Title VI Equity Analysis
SRTA’s required procedures performing a Transit Facility Title VI Equity Analysis are written and available in Section 2.F. At this time, SRTA has not conducted any transit facility Title VI Equity Analysis reviews as required by FTA Circular 4702.1B.

Since SRTA’s 2017 Title VI Plan, SRTA has requested funding for a new transit facility, the Sugarloaf Park-and-Ride lot located on the north side of Duluth Highway, east of the I-85 and west of North Brown Road NW. The park-and-ride lot is expected to be funded from Federal Surface Transportation Block Grant (STBG) flex funding from FHWA to FTA, General Obligation Bond issuances to the Georgia Regional Transportation Authority (GRTA4 and GRTA5 issuances), and in-kind land value. SRTA received a categorical exclusion for this project, which can be found in Appendix H.

J. SRTA Title VI Program Adoption
The GRTA Board of Directors will consider whether to recommend approval of this Title VI Program and related policies and definitions during the March 2020 GRTA Board Meeting. Pending a recommendation of approval from GRTA Board of Directors, the SRTA Board of Directors will consider final approval of the SRTA Title VI Program at the subsequent meeting.
2. Requirements of Fixed Route Transit Providers

A. Service Standards and Policies
SRTA has established Xpress Service Standards and Policies (Appendix C) which establishes service standards pertaining to:

- Trip and Route Productivity (Fare Box Recovery Ratio, Customers per Trip, Vehicle Load)
- Vehicle Headway
- On-Time Performance
- Service Availability
- Distribution of Transit Amenities
- Vehicle Assignment

B. Demographic and Service Profile Maps
As required by FTA Circular 4702.1B, Chapter IV, SRTA has prepared demographic and service profile maps of the Xpress service area utilizing data from the 2013-2017 American Community Survey. Copies of the maps based upon Xpress’ current services and the demographic data from the 2013-2017 American Community Survey are included in Appendices D.

Transit access by community is monitored at a planning level through regular short-range transit planning activities and the Title VI Program updates which reviews the racial make-up of census tracts served by existing Xpress routes, as well as those where SRTA is planning new services.

The tables below compare the minority, income and LEP status of the Xpress riders using the 2018 on-board survey and the population of the 13 counties served by Xpress using the American Community Survey 5-year Estimates, 2017. As compared to the region, Xpress ridership has somewhat greater representation by minorities and somewhat lower representation by low income and LEP populations.

Table 4: Demographic and Service Profile Maps

<table>
<thead>
<tr>
<th>Demographic and Service Profile Maps</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Demographic Category</td>
<td>Region</td>
<td>Xpress</td>
</tr>
<tr>
<td>Minority</td>
<td>55.3%</td>
<td>70.7%</td>
</tr>
<tr>
<td>Low Income</td>
<td>15.4%</td>
<td>7.9%</td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>7.9%</td>
<td>1.4%</td>
</tr>
</tbody>
</table>

C. Ridership Demographics and Survey Data
SRTA collected a survey of Xpress riders’ demographic data in the spring of 2018. This survey and its resulting data were utilized to develop a demographic profile for Xpress riders by route, and to identify the travel pattern they utilize. This demographic profile is maintained on a minority and non-minority basis. Tables summarizing the results by route are included in Appendix E.

D. Results of Monitoring
As required by FTA Circular 4702.1B, SRTA will monitor the Xpress commuter bus service for Title VI compliance once every three years based on the Service Standards and Policies. SRTA prepared a Title VI
Service Standards Monitoring Report which was reviewed and approved by the GRTA Board of Directors, acting as the Transit Advisory Board for the SRTA Board of Directors on September 12, 2018. The next compliance monitoring report will be completed in 2021.

E. Public Engagement Process for Setting Title VI Policies
Prior to formal adoption by the SRTA Board, SRTA conducted a 30-day public comment period which will begin on February 3, 2020 and end on March 3, 2020. In consistence with SRTA’s Public Participation Plan, the following activities will take place:

A. SRTA will publish a draft SRTA Title VI Program on the Xpress web site.
B. SRTA staff will host a public hearing on February 20, 2020
C. Notices will be posted on Xpress buses announcing the public comment period, public hearing date and availability of the draft Title VI Program, related policies and definitions including Major Service Change, Fare Change, Disparate Impact and Disproportionate Burden.
D. Advertise the public hearing in newspapers of general circulation at least five days prior to the public hearing. Newspapers include: Crossroads News, Atlanta Chinese News, Korea Daily, Mundo Hispanico, and others that will provide coverage to the 13-county area.

The public comment period will end prior to the March 2020 GRTA Board of Directors meeting

F. Service and Fare Equity Analysis Procedures
SRTA has adopted Title VI Service Policies and Definitions including major service change, disparate impact and disproportionate burden.

A major service change is defined as any route elimination, route addition, or service change of more than twenty-five percent of the revenue hours of operation for an individual route. Temporary changes in service lasting twelve months or less are exempt.

A Major Service Change Disparate Impact is defined as anytime the expected distribution of adverse effects to minority passengers is 15 percentage points more than the SRTA-operated Xpress average minority passenger distribution. The impact on passengers will be measured using system ridership from the most recent on-board customer survey. For a major service change that results in entirely new service, Census data will be used.

A Major Service Change Disproportionate Burden is defined as anytime the expected distribution of adverse effects to low-income passengers is 3 percentage points more than the SRTA-operated Xpress average low-income passenger distribution. The impact on passengers will be measured using system ridership from the most recent on-board customer survey. For a major service change that results in entirely new service, Census data will be used.

The effects of any fare change will be considered disparate and/or disproportionate if the percent change in average cost per trip for minority or low-income riders differs by more than 5 percentage points from the percent change for the overall ridership.

SRTA will conduct a Title VI service equity analysis for all fare changes and major service changes. Prior to implementation of a fare or major service change, SRTA will evaluate such changes to determine
whether they will have a discriminatory impact based on race, color, or national origin. Although low-income populations are not a protected class under Title VI, SRTA will also evaluate changes to determine whether fare or major service changes create a disproportionate burden on low-income populations.

If SRTA finds that a fare or major service change results in a disparate impact to minorities or a disproportionate burden on low-income individuals, SRTA will seek to avoid, minimize, or mitigate such impact and reanalyze the impacts of newly proposed changes. If SRTA does not alter the proposed changes, or, after revisions finds that minority and/or low-income populations continue to bear disproportionate adverse effects, SRTA will implement the changes only if:

- There is a substantial legitimate justification for the proposed service change, and
- There are no feasible alternatives that would have a less disparate/disproportionate impact on minority and/or low-income riders but would still accomplish SRTA’s legitimate program goals.

The SRTA Board is responsible for approving fare and major service changes and will consider the evaluation of disparate impacts and disproportionate burdens and mitigation plans prior to approving fare changes or major service changes.

Since the adoption of the last Title VI Program in 2017, SRTA has conducted one (1) equity analysis for changes to the Xpress fare structure. The Memorandum, Presentation, and Board Resolution showing the SRTA Board of Director’s approval may be found in Appendix I.

i. **Service Equity Analysis for Major Service Changes**

For major service changes, effects are measured in projected annual ridership. An **Adverse Effect** is a negative change in ridership while a **Beneficial Effect** is a positive change in ridership. When evaluating service changes, SRTA recognizes that the elimination or addition of a route, rather than a change in headways, presents a greater degree of impact, and will consider such differences in degrees when planning and evaluating service changes.

Title VI guidance requires that SRTA develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). The definitions from Section A above are used to determine when adverse effects of a major service change are borne disproportionately by minority and/or low-income populations.

ii. **Equity Analysis for Fare Changes**

For fare changes, adverse effects are measured in the change in the average fare paid by minority and low-income communities. SRTA will determine whether there are disparate impacts on minority riders and/or disproportionate burdens posed on low-income riders by analyzing the distribution of burden on the Title VI protected groups and the overall ridership. SRTA will determine the distribution of impacts by:

- Determining the number and percent of users of each fare media being changed across three user groups: overall ridership, minority riders, and low-income riders
- Reviewing fares for each user group before and after the proposed change focusing on average cost per trip
• Determining the percentage increase or decrease in average cost per trip for each user group due to the proposed fare change

The effects of any fare change will be considered disparate and/or disproportionate if the percent change in average cost per trip for minority or low-income riders differs by more than 5 percentage points from the percent change for the overall ridership. Data used in the above analysis will come from the most recent on-board customer survey. SRTA will use the results of the above analysis to avoid, minimize or mitigate the impact of fare media changes on minority and low-income populations.
Appendix A – Notice to Public

STATE ROAD AND TOLLWAY AUTHORITY

TITLE VI

Statement of Policy

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The State Road and Tollway Authority (SRTA) and the Xpress commuter service are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.

SRTA’s subrecipients and contractors are required to ensure nondiscrimination in all aspects of their program activities.

Filing a Discrimination Complaint

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, or national origin may file a Title VI complaint. Complaints may be filed directly to SRTA. Complaints must be filed in writing and signed by the complainant or a representative and should include the complainant’s name, address, and telephone number or other means by with the complainant can be contacted.

For more information on the SRTA’s civil rights program or to obtain a complaint form, please visit Xpressga.com or Georgiatolls.com, or contact customer service at 1-844-977-7742. Complaints should be filed in writing to the following:

SRTA Title VI Coordinator
State Road and Tollway Authority
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30030
TitleVI@srsa.ga.gov

Si la información que se necesita en otro idioma, comuníquese con 1-844-977-7742.

如果需要在另一种语言的信息，请联络1-844-977-7742。

如果需要在另一种语言的信息，请联络1-844-977-7742。

Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc 1-844-977-7742.

SRTA Title VI Program, January 2020
Appendix B – Complaint Procedures and Complaint Form

This document outlines the Title VI complaint procedures related to providing programs, services, and benefits. It does not deny the complainant the right to file formal complaints with the Georgia Department of Transportation, the Secretary of the US Department of Transportation, Equal Employment Opportunity Commission (EEOC), Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or to seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law. Title VI of the Civil Rights Act of 1964 requires that no person in the United States shall, on the grounds of race, color or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

1. Any person who believes that they have been subjected to discrimination may file a written complaint with the State Road and Tollway Authority Title VI Coordinator. Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident.

2. The complainant may download the complaint form from www.XpressGa.com or request the complaint form from the Title VI Coordinator. The complainant may also submit a written statement (i.e., and not use the complaint form) that contains all of the information identified in Section 3 a through f below.

3. The complaint will include the following information:
   a. Name, address, and telephone number of the complainant.
   b. The basis of the complaint, i.e., race, color, or national origin.
   c. The date or dates on which the alleged discriminatory event or events occurred.
   d. The nature of the incident that led the complainant to feel discrimination was a factor.
   e. Names, addresses, and telephone numbers of persons who may have knowledge of the event.
   f. Other agencies or courts or tribunals where complaint may have been filed and a contact name.
   g. Complainant’s signature and date.
   h. If the complainant is unable to write a complaint, the SRTA Title VI Coordinator will assist the complainant. If requested by complainant, the Title VI Coordinator will provide a language or sign interpreter.
   i. The complaint may be forwarded to SRTA using the following contact information:

       SRTA Title VI Coordinator
       State Road and Tollway Authority
       245 Peachtree Center Ave NE, Suite 2200
       Atlanta, GA 30303
       1-844-977-7742
       (404) 893-6160 (fax)
       TitleVI@srsa.ga.gov

   j. Complainants have the right to complain directly to the appropriate federal agency. However, they must do so within one-hundred eighty (180) calendar days of the last alleged incident.

4. The SRTA Title VI Coordinator will begin an investigation within fifteen (15) business days of receipt of a complaint.

5. SRTA Title VI Coordinator will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed, to investigate
the complaint. If the complainant fails to provide the requested information in a timely basis, the SRTA Title VI Coordinator may close the complaint.

6. SRTA Title VI Coordinator will complete the investigation within ninety (90) days of receipt of the complaint. A written investigation report will be prepared by the investigator. The report shall include a summary description of the incident, findings, and recommendations for disposition.

7. The SRTA Title VI Coordinator will review the report and will have five (5) working days from receipt of the report to respond. A closing letter and exit interview will be provided to the complainant. If either party responds negatively or has additional information to provide, an informal meeting will be arranged by the Title VI Coordinator. If neither party responds, the complaint will be closed.

8. The investigation report with recommendations and corrective actions taken will be forwarded to the appropriate federal agency, the complainant, and the respondent.

9. SRTA Title VI Coordinator will advise complainants of their appeal rights to the appropriate federal agency.

10. SRTA Title VI Coordinator prepares and maintains a list of active investigations with information related to the date, summary of the allegation(s), the status and actions taken by the recipient or sub-recipient in response to the complaint.

Si la información que se necesita en otro idioma, comuníquese con 1-844-977-7742.
如果需要在另一种语言的信息，请联系1-844-977-7742。
정보가 다른 언어로 필요한 경우 1-844-977-7742로 문의 바랍니다.
Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc 1-844-977-7742.

Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Two Executive Orders extend Title VI protections to Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

Please provide the following information in order to process your complaint. Assistance is available upon request. Complete this form and furnish a written (mail, fax, or email) copy to:

State Road and Tollway Authority
245 Peachtree Center Ave NE, Suite 2200
Atlanta GA 30303
Fax: (404) 893-6160
Email: TitleVI@srtga.ga.gov

1. Complainant’s Name: ______________________________________________
2. Address: __________________________________________________________

Si la información que se necesita en otro idioma, comuníquese con 1-844-977-7742.
如果需要在另一种语言的信息，请联系1-844-977-7742。
정보가 다른 언어로 필요한 경우 1-844-977-7742로 문의 바랍니다.
Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc 1-844-977-7742.
4. Telephone No. (Home): __________________ (Business): __________________

5. Person discriminated against (if other than complainant)

   Name: ________________________________________________________________
   Address: __________________________________________________________________
   City: _____________________ State: _______________ Zip Code: __________

6. What was the discrimination based on? (Check all that apply):
   □ Race/Color
   □ National Origin
   □ Sex

7. Date of incident resulting in discrimination: ____________________________

8. Describe the discrimination. What happened and who was responsible? For additional space, attach additional sheets of paper or use back of form.

9. Did you file this complaint with another federal, state, or local agency, or with a federal or state court? (Check appropriate space) □ Yes □ No

   If answer is yes, check each agency complaint was filed with:
   Federal Agency _______ Federal Court _______ State Agency _______
   State Court _______ Local Agency _______ Other _______

   Provide contact person information for the agency you also filed the complaint with:

   Name: ____________________________________________________________
   Address: __________________________________________________________________
   City: _____________________ State: _________ Zip Code: __________
   Date Filed: ____________________________________________________________________________

   Sign the complaint in space below. Attach any documents you believe supports your complaint.

   Complainant

Si la información que se necesita en otro idioma, comuníquese con 1-844-977-7742.
如果需要在另一种语言的信息，请联系1-844-977-7742。
정보가 다른 언어로 필요한 경우 1-844-977-7742로 문의 바랍니다.
Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc 1-844-977-7742.
Appendix C – Service Standards and Policies

Xpress Service Standards & Policies

1.0 Overview

The State Road and Tollway Authority (SRTA) provides Xpress commuter transit service which is provided from outlying suburban areas at designated locations, such as park and ride facilities, to the central downtown Atlanta business district, MARTA rail stations and/or other key activity centers within the Atlanta metro region. The service operates with limited stops utilizing interstate highways and a network of high occupancy vehicle and high occupancy toll/express lanes. The operation of Xpress commuter transit service is typically limited to the commute travel times each weekday between 5:30 am and 9:30 am and between 3:00 pm and 7:00 pm.

The primary purpose for maintaining service standards is to guide SRTA staff as to when service changes are necessary and ensure compliance with applicable federal guidelines. This document 1) sets SRTA’s service standards policies, 2) establishes a timeframe for monitoring them, 3) defines major service changes, and 4) establishes policies necessary to ensure the Xpress service does not create disparate impacts on minority populations nor pose disproportionate burdens on low-income populations.

2.0 Definitions

a) **Headway** – The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.

b) **Frequency** – Number of buses per hour on a specified route calculated by dividing 60 minutes by the route headway. Twenty-minute headway translates into a frequency of three buses per hour (60/20 = 3).

c) **Inbound/Outbound Service** – Indicates the direction of a route, usually from a centralized base location, such as a central business district, rail station, or transfer center. Xpress buses, for instance, operate inbound from suburban park and ride lots to a rail station or major employment center. Outbound service would indicate the opposite direction of service.

d) **Vehicle Load Factor** – The ratio of customers on board a bus compared to the number of available seats. For example, if a bus offers 57 seats and there are 63 customers on board, the load factor would be 1.10. Load factors greater than 1.0 indicate that customers are standing.

e) **Farebox Recovery Ratio** – Total revenue generated by the ridership on a specified route divided by the operating cost for that route.

f) **SRTA Operated Xpress Routes** – The Xpress routes that are paid for, and operated, by SRTA.

g) **Route** – The scheduled path traced by an Xpress bus with a number of specific stops over a consistent time frame.

h) **Trip** – A single course of travel within a route.

i) **Minority Route** – SRTA operated Xpress routes that, according to the most recent on-board customer survey, have a percentage of minority riders that is at least 15 percentage points higher than the average concentration of minority riders on all SRTA operated Xpress routes.
j) **Peak Service** – Xpress service generally operated between 5:30am and 10:00am and between 1pm and 7:45pm.

k) **Customers Per Trip** – The number of passengers on a trip.

### 3.0 Xpress Service Standards and Policies

This section sets service standards pertaining to:

- Trip and Route Productivity (Fare Box Recovery Ratio, Customers per Trip, Vehicle Load)
- Vehicle Headway
- On-Time Performance
- Service Availability
- Distribution of Transit Amenities
- Vehicle Assignment

In order to ensure compliance with Title VI regulations, SRTA will monitor the performance of SRTA operated Xpress routes relative to the above standards and policies at least once every three years.

1.) **Trip and Route Productivity Standards**

New routes take some time to attract ridership. General economic conditions, fuel costs, service design and the market for the service affect the time required for a new service to achieve acceptable ridership levels. Service standards have been established by year of operation so that new and existing services can be monitored for adequate progress in meeting service productivity standards. Xpress standards for trip and route productivity are shown in Table 1:

#### Table 1: Xpress Trip and Route Productivity Standards

<table>
<thead>
<tr>
<th>Years of Operation</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
<th>Year 4 &amp; Longer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimum Fare Box Recovery Ratio</td>
<td>10%</td>
<td>15%</td>
<td>20%</td>
<td>25%</td>
</tr>
<tr>
<td>Minimum Customers per Trip</td>
<td>8</td>
<td>11</td>
<td>14</td>
<td>17</td>
</tr>
</tbody>
</table>

2.) **Trip and Route Productivity Improvement**

The service standards above describe the minimum standards that SRTA will use to identify underperforming or unproductive service. Routes, route segments, or trips that are performing below at least one of the standards warrant comprehensive evaluation and corrective actions, and strategies that are intended to improve the productivity of specific service components may be pursued. Corrective measures may include the following:

- Increase marketing efforts or information dissemination
- Route redesign or segment rerouting
- Change the frequency of service
- Change the hours of service
- Eliminate unproductive/underutilized service, which may include an entire route, route segment or specific trips operated on a route

3.) **Maximum Vehicle Load**

Xpress commuter transit service typically relies upon travel at relatively high speeds. In order to maximize safety, standees should be avoided. Therefore, SRTA has two standards related to maximum vehicle load:
• No Xpress trip will include more than 15 standees, in accordance with vehicle capacity limits. In the event the vehicle manufacturer’s capacity limit only allows for less than 15 standees, the maximum vehicle load will default to the manufacturer’s capacity limit.
• Service modifications will be considered for routes and trips where standing loads occur more often than once per week.

To ensure compliance with these standards, preserving safety and comfort, SRTA will review route and trip load factors on an ongoing basis and adjust schedules up to twice per year to mitigate overcrowding.

4.) Vehicle Headway

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A consistently shorter headway corresponds to more frequent service. SRTA’s vehicle headway standard is related to vehicle load and trip productivity, which are indicators of market demand for the Xpress commuter service. Vehicle headways may vary by route and time of day, based on ridership demand that is driven largely by residential and workplace populations. Table 1 includes route and trip productivity standards, and SRTA will assess productivity according to these standards up to twice per year. SRTA will consider reducing headways for trips and/or routes that regularly have standing loads (seat capacity load factor greater than 1.0) more often than once per week. Of these trips and/or routes, SRTA will reduce headways first on routes with the highest vehicle load factors and/or customers per trip. SRTA will consider increasing headways for trips that fall below the minimum customers per trip standards shown in Table 1 and will increase headways first on trips and/or routes with the lowest customers per trip and/or farebox recovery ratios.

5.) On-Time Performance

On-time performance (OTP) is a measure of trips completed as scheduled. On-time is defined as a bus that departs a scheduled stop between zero and five minutes after the scheduled departure time. SRTA’s overall OTP goal for Xpress is for at least 85% of all trips. To achieve this goal, SRTA has two OTP service standards:

• Zero Xpress trips shall depart early. In other words, the Xpress system shall achieve 0% of trips “running hot.”
• At least 85% of Xpress trips shall depart less than 5 minutes after the scheduled departure time. In other words, there shall be no more than 15% late trips.

SRTA will review available OTP data on an ongoing basis and adjust schedules up to twice per year.

6.) Service Availability

Service availability refers to the geographic distribution of Xpress service within the Xpress service area. Unlike with local transit service, the Xpress service model specializes in commute trips that are longer than 10 miles, with destinations at major employment centers in the metro Atlanta region. The Xpress service area includes 13 counties, but Xpress riders come from more than 40 counties. Many customers use the service to decrease (but not eliminate) personal driving distance on their commutes. To serve as many potential riders as possible, SRTA will:
• Operate at least one route on each major interstate corridor entering metro Atlanta: I-75 from the north and south, I-85 from the north and south, and I-20 from the east and west.
• Operate at least one route on each of the SRTA-operated managed lane systems in metro Atlanta. For calendar year 2020 this includes the managed lane systems along I-85 to the Northeast of metro Atlanta, the I-75 South system in Southwest metro Atlanta, and the Northwest Corridor system along I-75 in the Northwestern part of metro Atlanta.
• Analyze market conditions and financial feasibility to expand service at least once every 10 years. Identify opportunities to increase service on existing routes, and to add service connecting additional residential areas and/or additional job centers.

7.) Distribution of Transit Amenities

Transit amenities refer to items of comfort, convenience, and safety that are available to Xpress customers. SRTA has three standards regarding transit amenities at Xpress park and ride lots, addressing three types of lots based on ownership:

• Newly constructed, state-owned Xpress stations shall have the same package of amenities with passenger pavilions, route and schedule displays, benches, waste receptacles, ADA parking spaces, and an equipment room. The design of new and refurbished stations and amenities will follow the requirements outlined in the Xpress Station and Park & Ride Design Manual.
• For leased lots, the investment in amenities is limited by the very short-term nature of the lease agreements. Since SRTA is required to protect the federal interest for the useful life of its assets, required construction at leased lots is limited to passenger shelters and ADA parking spaces. However, SRTA will review other possible transit amenities options with landowners when negotiating lease agreements.
• Interagency lots are owned and controlled by other transit systems or units of local government. The decision on the design and placement of amenities at these locations is controlled by the property owner. SRTA has no requirements for transit amenities at these lots, but SRTA will review available transit amenities options with interagency partners.

As of the effective date of this Program, SRTA has not built any escalators or elevators.

8.) Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the Xpress system. As to vehicle assignment, SRTA will:

• Rotate Xpress vehicles at each operating location among routes so that no route in the Xpress system receives vehicles that are on average more than three years older than the system average for all SRTA-operated Xpress routes. For the purpose of assessing compliance with this standard, a vehicle that has been rehabilitated according to the Xpress Transit Asset Management (TAM) Plan is considered new. In other words, vehicle age for this standard shall be calculated based on the model year only for vehicles that have not been rehabilitated and based on the most recent rehabilitation year for those vehicles that have been rehabilitated.
  ○ SRTA may assign particular vehicle model types that are designed with accessibility options on particular routes in which there is higher demand for specific accessibility options. In this case, the assignment of vehicles with alternative accessibility features will
only be based on the vehicle’s age relative to the system-wide fleet and not based on vehicle layout.
Appendix D – Demographic Data Maps

Minority Populations
Using the American Community Survey 5-year estimates (2017), SRTA has determined that 55.3% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, “minority” is defined as any individual not classified as white, non-Hispanic. Table 1 shows the proportion of minority/non-minority for each county in the 13-county area.

Table 2: Minority Population by County in Xpress Service Area

<table>
<thead>
<tr>
<th>County</th>
<th>Total Population</th>
<th>Minority Population</th>
<th>Non-Minority Population</th>
<th>Percent Minority Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cherokee</td>
<td>235,896</td>
<td>47,517</td>
<td>188,379</td>
<td>20.1%</td>
</tr>
<tr>
<td>Clayton</td>
<td>274,150</td>
<td>243,315</td>
<td>30,835</td>
<td>88.8%</td>
</tr>
<tr>
<td>Cobb</td>
<td>739,072</td>
<td>346,841</td>
<td>392,231</td>
<td>46.9%</td>
</tr>
<tr>
<td>Coweta</td>
<td>138,015</td>
<td>39,268</td>
<td>98,747</td>
<td>28.5%</td>
</tr>
<tr>
<td>DeKalb</td>
<td>736,066</td>
<td>522,223</td>
<td>213,843</td>
<td>70.9%</td>
</tr>
<tr>
<td>Douglas</td>
<td>140,152</td>
<td>79,357</td>
<td>60,795</td>
<td>56.6%</td>
</tr>
<tr>
<td>Fayette</td>
<td>110,306</td>
<td>39,552</td>
<td>70,754</td>
<td>35.9%</td>
</tr>
<tr>
<td>Forsyth</td>
<td>211,300</td>
<td>53,040</td>
<td>158,260</td>
<td>25.1%</td>
</tr>
<tr>
<td>Fulton</td>
<td>1,010,420</td>
<td>607,070</td>
<td>403,350</td>
<td>60.1%</td>
</tr>
<tr>
<td>Gwinnett</td>
<td>889,954</td>
<td>540,520</td>
<td>349,434</td>
<td>60.7%</td>
</tr>
<tr>
<td>Henry</td>
<td>217,506</td>
<td>115,854</td>
<td>101,652</td>
<td>53.3%</td>
</tr>
<tr>
<td>Paulding</td>
<td>152,399</td>
<td>41,100</td>
<td>111,299</td>
<td>27.0%</td>
</tr>
<tr>
<td>Rockdale</td>
<td>88,482</td>
<td>57,889</td>
<td>30,593</td>
<td>65.4%</td>
</tr>
<tr>
<td>Total 13-counties</td>
<td>4,943,718</td>
<td>2,733,546</td>
<td>2,210,172</td>
<td>55.3%</td>
</tr>
</tbody>
</table>

Source: American Community Survey 5-Year Estimates, 2017, data table DP05
*Minority Population is defined as individuals whose race is not White Non-Hispanic

The following map depicts the census tracts in the 13-county area with a higher concentration of minority populations than the service area average as well as an overlay of the Xpress service. The map shows that minority populations are mainly concentrated in areas of Fulton, DeKalb, Clayton, Gwinnett, and Cobb Counties.
Low-Income Populations

Table 2 presents the low-income population by county within the 13-county area.
### Table 2: Low-Income Population by County in 13-County Service Area

<table>
<thead>
<tr>
<th>County</th>
<th>Percent Population below Poverty (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cherokee County</td>
<td>10.27</td>
</tr>
<tr>
<td>Clayton County</td>
<td>22.51</td>
</tr>
<tr>
<td>Cobb County</td>
<td>11.00</td>
</tr>
<tr>
<td>Coweta County</td>
<td>10.49</td>
</tr>
<tr>
<td>DeKalb County</td>
<td>18.02</td>
</tr>
<tr>
<td>Douglas County</td>
<td>14.25</td>
</tr>
<tr>
<td>Fayette County</td>
<td>6.32</td>
</tr>
<tr>
<td>Forsyth County</td>
<td>6.53</td>
</tr>
<tr>
<td>Fulton County</td>
<td>19.78</td>
</tr>
<tr>
<td>Gwinnet County</td>
<td>13.20</td>
</tr>
<tr>
<td>Henry County</td>
<td>11.10</td>
</tr>
<tr>
<td>Paulding County</td>
<td>9.56</td>
</tr>
<tr>
<td>Rockdale County</td>
<td>16.19</td>
</tr>
<tr>
<td>Combined 13-Counties</td>
<td>15.14</td>
</tr>
</tbody>
</table>

Source: American Community Survey 5-year Estimates (2017) DP03

The following map depicts areas with a higher concentration of low-income populations in the Xpress service area. Higher concentrations of low-income populations can be found in the central portion of the service area as well as portions of the outlying counties.
Figure 2: Low Income Population in Service Area

Population of Service Area by People Living in Poverty

- Expressways
- County
- Xpress Park and Ride
- Xpress Routes

Low Income Population
% People in Poverty
- Below Mean
- Above Mean

Mean = 15.14%
Limited English Proficiency Populations

The United States Census’ most recent American Community Survey (ACS) 5-year estimates (2017) offer a current and reliable estimate of the number, proportion, and geographic distribution of Limited English Proficiency (LEP) individuals in the 13-county area. Specifically, the estimate shows persons 5 years or older where the language spoken at home is not English and English is spoken “Less than very well.”

According to the ACS, of the total population over the age of five in the 13-county area (4,619,393):

- approximately 19.7% (909,233) speak a language other than English at home; and
- approximately 7.9% (365,785) speak English less than “very well”.

Table 3: LEP Population by County in Service Area

<table>
<thead>
<tr>
<th>County</th>
<th>Total Population of Speaking Age (5 Years and Older)</th>
<th>LEP Population</th>
<th>Percent LEP Population (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cherokee County</td>
<td>221,203</td>
<td>10,841</td>
<td>4.90%</td>
</tr>
<tr>
<td>Clayton County</td>
<td>252,893</td>
<td>23,989</td>
<td>9.49%</td>
</tr>
<tr>
<td>Cobb County</td>
<td>691,230</td>
<td>51,909</td>
<td>7.51%</td>
</tr>
<tr>
<td>Coweta County</td>
<td>129,320</td>
<td>5,144</td>
<td>3.98%</td>
</tr>
<tr>
<td>DeKalb County</td>
<td>682,939</td>
<td>61,050</td>
<td>8.94%</td>
</tr>
<tr>
<td>Douglas County</td>
<td>131,184</td>
<td>5,402</td>
<td>4.12%</td>
</tr>
<tr>
<td>Fayette County</td>
<td>105,483</td>
<td>3,407</td>
<td>3.23%</td>
</tr>
<tr>
<td>Forsyth County</td>
<td>198,004</td>
<td>12,880</td>
<td>6.50%</td>
</tr>
<tr>
<td>Fulton County</td>
<td>947,692</td>
<td>51,649</td>
<td>5.45%</td>
</tr>
<tr>
<td>Gwinnet County</td>
<td>828,991</td>
<td>125,369</td>
<td>15.12%</td>
</tr>
<tr>
<td>Henry County</td>
<td>204,781</td>
<td>6,346</td>
<td>3.10%</td>
</tr>
<tr>
<td>Paulding County</td>
<td>142,456</td>
<td>2,385</td>
<td>1.67%</td>
</tr>
<tr>
<td>Rockdale County</td>
<td>83,217</td>
<td>5,414</td>
<td>6.51%</td>
</tr>
<tr>
<td><strong>Combined 13-Counties</strong></td>
<td><strong>4,619,393</strong></td>
<td><strong>365,785</strong></td>
<td><strong>7.92%</strong></td>
</tr>
</tbody>
</table>

Source: American Community Survey 5-Year Estimates (2017) S1606
Figure 3: LEP Population by County in Service Area
**Appendix E – Ridership Demographics (Survey Data)**

The ridership demographic data presented in the tables below was conducted as part of the 2018 Xpress On-Board Survey.

**Table 1: Minority Ridership by Route**

<table>
<thead>
<tr>
<th>Route</th>
<th>African American</th>
<th>Hispanic/Latinx</th>
<th>Asian</th>
<th>Pacific Islander</th>
<th>Native American</th>
<th>White</th>
<th>Other</th>
<th>Totals</th>
<th>% Minority</th>
</tr>
</thead>
<tbody>
<tr>
<td>400</td>
<td>2</td>
<td>3</td>
<td>35</td>
<td>0</td>
<td>0</td>
<td>26</td>
<td></td>
<td>66</td>
<td>60.61%</td>
</tr>
<tr>
<td>401</td>
<td>0</td>
<td>2</td>
<td>21</td>
<td>0</td>
<td>0</td>
<td>17</td>
<td></td>
<td>40</td>
<td>57.50%</td>
</tr>
<tr>
<td>408</td>
<td>22</td>
<td>5</td>
<td>9</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td></td>
<td>40</td>
<td>90.00%</td>
</tr>
<tr>
<td>410</td>
<td>26</td>
<td>7</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>20</td>
<td></td>
<td>59</td>
<td>66.10%</td>
</tr>
<tr>
<td>411</td>
<td>26</td>
<td>5</td>
<td>8</td>
<td>0</td>
<td>2</td>
<td>67</td>
<td></td>
<td>108</td>
<td>37.96%</td>
</tr>
<tr>
<td>412</td>
<td>34</td>
<td>4</td>
<td>44</td>
<td>0</td>
<td>0</td>
<td>56</td>
<td></td>
<td>138</td>
<td>59.42%</td>
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<tr>
<td>413</td>
<td>15</td>
<td>8</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>28</td>
<td></td>
<td>56</td>
<td>50.00%</td>
</tr>
<tr>
<td>414</td>
<td>16</td>
<td>6</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>28</td>
<td></td>
<td>56</td>
<td>50.00%</td>
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<tr>
<td>416</td>
<td>55</td>
<td>13</td>
<td>13</td>
<td>1</td>
<td>1</td>
<td>51</td>
<td></td>
<td>134</td>
<td>61.94%</td>
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<td>5</td>
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<td></td>
<td></td>
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<td>1</td>
<td>44</td>
<td>72.73%</td>
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<td>8</td>
<td>19</td>
<td>1</td>
<td>4</td>
<td>35</td>
<td></td>
<td>196</td>
<td>82.14%</td>
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<td>2</td>
<td>1</td>
<td>0</td>
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<td>153</td>
<td>92.81%</td>
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<td>9</td>
<td>3</td>
<td>1</td>
<td>6</td>
<td>34</td>
<td></td>
<td>251</td>
<td>86.45%</td>
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<tr>
<td>428</td>
<td>40</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>6</td>
<td></td>
<td>49</td>
<td>87.76%</td>
</tr>
<tr>
<td>430</td>
<td>105</td>
<td>6</td>
<td>4</td>
<td>1</td>
<td>0</td>
<td>29</td>
<td></td>
<td>145</td>
<td>80.00%</td>
</tr>
<tr>
<td>431</td>
<td>62</td>
<td>5</td>
<td>5</td>
<td>0</td>
<td>2</td>
<td>24</td>
<td></td>
<td>98</td>
<td>75.51%</td>
</tr>
<tr>
<td>432</td>
<td>107</td>
<td>6</td>
<td>7</td>
<td>1</td>
<td>4</td>
<td>23</td>
<td></td>
<td>148</td>
<td>84.46%</td>
</tr>
<tr>
<td>440</td>
<td>78</td>
<td>4</td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>22</td>
<td></td>
<td>110</td>
<td>80.00%</td>
</tr>
<tr>
<td>441</td>
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<td>4</td>
<td>4</td>
<td>1</td>
<td>4</td>
<td>5</td>
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<td>83</td>
<td>93.98%</td>
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<tr>
<td>442</td>
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<td>2</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>3</td>
<td></td>
<td>40</td>
<td>92.50%</td>
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<tr>
<td>453</td>
<td>51</td>
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<td>5</td>
<td>1</td>
<td>0</td>
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<td></td>
<td>128</td>
<td>50.78%</td>
</tr>
<tr>
<td>463</td>
<td>128</td>
<td>7</td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>60</td>
<td></td>
<td>199</td>
<td>69.85%</td>
</tr>
<tr>
<td>476</td>
<td>83</td>
<td>11</td>
<td>4</td>
<td>0</td>
<td>2</td>
<td>34</td>
<td></td>
<td>134</td>
<td>74.63%</td>
</tr>
<tr>
<td>480</td>
<td>23</td>
<td>12</td>
<td>7</td>
<td>0</td>
<td>0</td>
<td>26</td>
<td></td>
<td>68</td>
<td>61.76%</td>
</tr>
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Appendix F – Public Participation Plan

State Road and Tollway Authority
Public Involvement/Public Participation Plan

The State Road and Tollway Authority (SRTA) is a Federal Transit Administration (FTA) grant recipient and has adopted this Public Participation Plan. The SRTA Board is established by state law which specifies the membership including the Governor and other senior state officials.

I. GOALS AND GUIDING PRINCIPLES

The State Road and Tollway Authority (SRTA) is strongly committed to seeking and encouraging public participation in the planning process. The overall goal of the SRTA Public Participation Plan is to establish a framework for achieving mutual understanding of project issues among all concerned stakeholders involved and impacted by the relevant project or service change and to effectively engage minority, low-income, and limited English proficient populations in the public decision making process. SRTA engages in public outreach to ensure that its stakeholders receive information regarding the status of the relevant project or service change and participate in the decision making and planning process.

Members of Limited English Proficiency (LEP) populations in particular are served through the use of translated documents when requested, translation services through the Xpress website, through interpreters available by calling SRTA at 1-844-977-7742 and by the availability of interpretation services where otherwise applicable.

A. Federal Requirements

Federal Transit Administration regulations require inclusive public participation in transportation decision making. These requirements are contained in multiple circulars that apply to SRTA’s transit services including:

- **FTA C 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients,**
  - Chapter III, paragraph 8, Promoting Inclusive Public Participation
  - Chapter II, paragraph 9, Requirement to Provide Meaningful Access to LEP Persons.

- **FTA C 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients.**

- **49 U.S.C. Sections 5307(b) which requires programs of projects to be developed with public participation and 5307(c)(1)(I) which requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service.**

- **Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, Aug. 11, 2000), which requires that recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).**

This SRTA Public Participation Plan is intended to document SRTA’s activities to meet or exceed these federal requirements.
B. Public Participation Plan Goals

SRTA endeavors to provide meaningful opportunities for the public to assist staff in identifying social, economic, and environmental impacts of proposed transportation decisions. This includes input from low-income, minority and LEP populations.

Specific goals and outcomes include:

- **Quality Input and Participation** – Comments received by SRTA are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

- **Consistent Commitment** – SRTA staff communicates regularly, develops trust with communities and builds community capacity to provide public input.

- **Diversity** – Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities and residents with limited English proficiency.

- **Accessibility** – Effort is made to ensure that opportunities to participate are accessible physically, geographically, temporally, linguistically and culturally.

- **Relevance** – Issues are framed in such a way that the significance and potential effect is understood by participants.

- **Participant Satisfaction** – People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.

- **Clarity in Potential for Influence** – The process clearly identifies and communicates where and how participants can have influence and direct impact on decision-making.

SRTA’s public participation activities are based on the following principles:

- **Flexible** – The engagement process accommodates participation in a variety of ways and is adjusted as needed.

- **Inclusive** – SRTA proactively reaches out and engages low income, minority and LEP populations.

- **Respectful** – All feedback received is given careful and respectful consideration.

- **Tailored** – SRTA’s public participation methods are tailored to match local and cultural preferences as much as possible.

- **Trustworthy** – Information provided is accurate and trustworthy.

- **Responsive** – SRTA strives to respond to and incorporate appropriate public comments into transportation decisions.

II. DEFINITIONS

The definitions noted below are related to the Public Participation Plan. Additional definitions are included in FTA C 4702.1B and SRTA’s adopted Title VI Program.

Limited English Proficient (LEP) persons means 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.

Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed
threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: “refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved” or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

Minority persons means the following:

- 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.
- 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.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- 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.

National origin means the particular nation in which a person was born, or where the person’s parents or ancestors were born. Information on the demographic characteristics of Xpress riders and the Xpress 13-county service area may be found in Appendix E of the 2020 SRTA Title VI Program.
Public Participation Methods

SRTA strives to proactively promote public involvement and to inform the public of current initiatives, issues and programs. The following are examples that SRTA may use to inform, invite participation, and/or seek public input. SRTA has identified how each example could best be used and is based on input collected from the community and SRTA staff experience. The examples are not listed in priority order.

1. **Printed Materials Produced by SRTA** - Outreach information can be publicized in printed materials produced by SRTA such as rider notices, car cards, flyers, posters, and banners. Based on experience, SRTA has found a combination of these methods, along with e-notifications, to be the most effective forms of notification.

2. **Xpress Website and Twitter** - The Xpress website, [http://www.XpressGA.com](http://www.XpressGA.com) is a communications tool providing substantial information about Xpress policies, strategies, plans, and methods. SRTA and Xpress websites provide the option to translate many of the web pages into multiple languages. SRTA also uses social networking applications such as Twitter. Visit Xpress Twitter feed at [https://twitter.com/XpressGA](https://twitter.com/XpressGA) for more sources of updated information.

3. **Station Information Resources** - Information resources may be located in MARTA stations and Xpress Transit Centers to communicate schedule and service information. Fixed and electronic postings in the transit stations and centers are also used to conduct outreach.

4. **Media Targeted to Ethnic Communities** - Participation opportunities are publicized through newspaper publications serving primarily English and Spanish speaking audiences. SRTA also publicizes in other ethnic community media when applicable.

5. **Coordination with Community Events** – SRTA hosts information booths to provide materials regarding its service and outreach methods at community events.

6. **Meetings with Civic and Community Organizations** – SRTA works with organizations identified through the Atlanta Regional Commissions public participation process. As needed, SRTA provides updates on its policies, projects, strategies, and methods by accepting invitations to participate in scheduled meetings of civic associations. These gatherings provide an opportunity to make a presentation, answer questions, and address issues.

7. **Informational Public Meetings** – SRTA conducts several different types of meetings. Some meetings are designed to engage the public to provide their input, testimony, or comments regarding proposed changes. Venues for meetings should be fully accessible for persons with disabilities, and in general served by public transit. It is typical to conduct a series of meetings on a single topic. SRTA considers the best areas or communities to conduct meetings and hearings by first examining the topic and/or the issues that may affect riders and communities. SRTA secures meeting venues with consideration to time of day, length of time required for the meetings, and the number of expected attendees.

8a. **Meeting Formats**

   - **Informational Open House** - This format provides opportunities for participants to receive information at their own pace by visiting a series of information stations that may include tabletop displays, maps, Power Point presentations, photographs, visualizations, and other tools. Participants have the opportunity for one-on-one conversations with the appropriate SRTA staff. Occasionally open houses include a short educational presentation followed by a discussion period for comments and questions and answers. Participants are often given comment forms to provide written comments.
SRTA staff are available to take verbal comments and transcribe them to provide a written record.

- **Public Hearings** – Public hearings are conducted to obtain formal comments for the public record. They are normally conducted with a hearing officer and a court reporter who transcribes the public comments.

### 8b. Community Meeting Considerations

- **Meeting Locations** - Locations are selected for the convenience and comfort level of the public. Typical venues include public libraries, local schools, colleges, and state or city owned buildings. SRTA conducts all public participation activities at locations fully accessible to persons with disabilities and preferably, the venues should be served by public transit.

- **Meeting Times** - Public participation methods are scheduled at varying times of day and preferably on different days of the week. Typically, meetings are conducted on weeknights after traditional work hours. Meetings conducted in the central business district are scheduled during traditional lunch hours with additional late afternoon hours permitting attendance after work by interested persons.

### 9. Translation and Interpretive Services

- SRTA works with translation services to translate written public information into other languages as needed. Prearranged onsite language interpretation service is provided upon request at public meetings/hearings.

### 10. SRTA’s Ongoing Public Participation Methods

- SRTA promotes ongoing public participation with emphasis on outreach to low income, minority, and LEP populations and conducts proactive outreach to expand the reach, inclusivity, and effectiveness of its transit services. Examples of ongoing methods include:
  
  - Xpress communications via Twitter https://twitter.com/XpressGa
  - Xpress List email notification system
  - Regular communications with media
  - Press briefings and news releases
  - Rider bulletins at Xpress park and ride lots and on vehicles
  - Language Line Services (LLS)
  - Language interpreters at public meetings (when requested)
  - MyXpress App real time tracking system
  - Customer text messaging system
III. PROGRAM/ACTIVITY SPECIFIC PUBLIC PARTICIPATION PROCESS

A. Overview

Using the regulations and guidance provided in federal and state law, SRTA staff uses the principles and guidance set out in this document to carry out public involvement activities that will ensure inclusive public participation in the decision-making process.

SRTA staff uses some of the examples described in this Plan when carrying out the public involvement activities for the Xpress Regional Commuter Service and SRTA capital projects or planning studies.

B. Methodology

SRTA staff evaluates the program, policy, or other activity for which public involvement is either required or desirable to determine the most appropriate methods for achieving inclusive public participation in the decision-making process. SRTA staff is not limited to only those specific activities, and within the resource limits of the SRTA, uses the best practices for engaging the public.

C. Public Participation Process for Xpress Fare Changes, Major Service Changes, and Amendments to the Service Standards and Title VI Policies and Definitions.

When considering fare changes, major service changes and amendments to the services standards and Title VI policies and definitions, SRTA provides an opportunity for public participation by conducting a 30-day public comment period and at least one public hearing.

I. 30-Day Public Comment Process

SRRTA will do the following as it relates to the public comment process:

1. Post notices to inform the public and solicit rider comments on buses and the Xpress website. The notices will be placed prior to, and for the duration of, the 30-day public comment period and will announce the proposed changes, public comment period, and public hearing date(s).

2. Advertise the public hearing(s) in a newspaper(s) of general circulation and via other print, video, or electronic media as deemed appropriate by the SRTA Chief Communications Officer, or designee. Advertisements will appear no fewer than five days prior to the date of the public hearing.

3. Comments received outside of the 30-day public comment period may be considered in the decision-making process or may be reserved for consideration in future revisions of the policy addressed by the comment.

4. Following the completion of the 30-day public comment period, the SRTA staff will prepare a public comment summary for consideration by the GRTA Board of Directors.

5. The Georgia Regional Transportation Authority (GRTA) Board shall serve as an advisory board in the SRTA Public Participation Plan process for Xpress Fare Changes, Major Service Changes, Amendments to the Service Standards and Title VI Policies and Definitions, and any other matters requested by the SRTA Board. The GRTA Board shall receive the public comments, together with staff recommendations and other materials, and will make a recommendation to the SRTA Board of Directors concerning the proposed action.
6. The SRTA Board shall take appropriate action upon completion of the public process.

II. Public Hearing

When SRTA staff determines that a formal public hearing is to be held, the public hearing will consist of the following:

1. Information period to allow SRTA to explain the nature of the changes in service, detailing the reasoning behind the proposal, to the public;
2. Opportunity for public comment that allows members of the general public an opportunity to express their views;
3. A court reporter to record comments from members of the public who prefer to provide direct, oral comments; and
4. Public hearings will be of public record and open to all members of the public. All public hearings must be recorded and transcripts available to the public upon request.

Public hearings are typically held within the 30-day public comment period, but may begin before the period formally starts and extend after the period has ended; so long as the last hearing is held prior to the day in which the SRTA Board of Directors is scheduled to address the issues under review.

III. Special Needs

Public hearings and meetings will be held in an ADA accessible facility and in areas served by public transit. Hearing materials, publications, and explanations in alternative formats will be provided upon request. Braille publications for the visually impaired will be provided upon sufficient notice of two weeks. All requests for alternative formats for hearing materials and publications should be submitted to Office of Communications and Engagement, State Road and Tollway Authority, at SRTA’s headquarters address as listed on its website in writing at least 4 days prior to the hearing date.

D. SRTA Oversight of Contractors and Subrecipients

As of the data of this SRTA Public Involvement Plan SRTA does not have any subrecipients that operate transit services. And, SRTA staff manages the public involvement activities for all contract operated Xpress service. In the event that SRTA establishes a subrecipient or contractor that operates a separate service SRTA will provide oversight of the public involvement activities.

Accordingly the Chief Communications Officer, the Title VI Coordinator, and the Compliance Manager shall be responsible for monitoring and observing the public involvements activities of and maintaining the records necessary for documenting that SRTA contractors and subrecipients are conducting compliant public involvement activities when making significant changes in transit services or fares. At least once every three years, a letter shall be sent to each contractor and subrecipient informing and reminding the contractor or subrecipient of their compliance obligations. The letter shall:

1. Require that the contractor or subrecipient submit to SRTA a current copy of the contractor’s or subrecipient’s Public Involvement Plan for Title VI and significant changes in transit service or fares and its transit service standards and policies;
2. Require that the subrecipient notify SRTA of the initiation of public involvement activities related to Title VI or when making a significant change in transit services or fares at least 14 calendar days before the occurrence of the first activity; and

3. Make reference to the appropriate current federal legislation and related guidance and provide a list of the documentation required to be submitted to SRTA to verify that the contractor or subrecipient has conducted a compliant public involvement process in regard to Title VI and when making significant changes to transit service or fares. The documentation shall include, but is not limited to:

   a. Copies of meeting announcements, including posters and flyers, print advertisements and related notarized affidavits of publication, screen shots of web page notifications and any internet advertising, and audio or video files of any radio or television announcements made, along with lists of where such advertising or notification was placed or distributed;

   b. Copies of meeting sign-in sheets, minutes, or other evidence of public attendance at the meetings;

   c. Copies of materials provided to the public as part of the public involvement process, and especially those that show evidence of addressing the needs of Title VI and Limited English Proficiency populations; and

   d. A memorandum describing the public comment received, how any questions or concerns raised by the public were addressed, and of how that public comment was incorporated into the final decisions made regarding the significant change in transit service or fares.

In addition, the Title VI Coordinator, with the assistance of the Chief Communications Officer and the Compliance and DBE Officer shall:

1. At least once every three years, review the public involvement plan and service standards and policies submitted by the contractors and/or subrecipients to determine if they meet the federal standards for such plans as the SRTA staff understands those standards.

2. After the review of the contractor’s or subrecipient’s public involvement plan and service standards and policies, prepare a memorandum noting whether or not the contractor’s or subrecipient’s public involvement plan and service standards and policies appear to be compliant with current federal standards. If they do not appear to be compliant, the Title VI Coordinator will initiate a conversation with the contractor or subrecipient to clarify the requirements and make any necessary suggestions for improving the service standards and/or policy, as applicable, so that it may comply with current federal standards. Copies of the memorandum will be provided to and placed in the contractor’s or subrecipient’s public involvement file.

3. The Title VI Coordinator shall maintain a file of the various documents and other evidence for each of the contractor’s or subrecipient’s public involvement efforts.

Furthermore, the Title VI Coordinator, with assistance from the Compliance and DBE Officer shall at least once every three years monitor the activities of the Vanpool Program contractors to ensure their
compliance with FTA Title VI requirements. At a minimum, SRTA will require the vanpool contractors to submit:

1. Copies of their Language Assistance Plan;
2. A Statement of Policy indicating that the vanpool service operated by the contractor is in compliance with Title VI;
3. Title VI complaint forms and procedures; in addition to
4. Any other compliance items not specifically related to Title VI
Appendix G – Limited English Proficiency Access Plan

I. Introduction

The State Road and Tollway Authority (SRTA) has developed its Limited English Proficiency (LEP) Plan to be consistent with Title VI of the Civil Rights Act of 1964, DOT’s guidance “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (70 FR 74087, December 14, 2005), and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, August 11, 2000). In developing the plan, SRTA has taken reasonable steps to ensure individuals who are limited-English proficient (LEP) have meaningful access to benefits, services, information, and other important portions of its programs and activities.

SRTA’s LEP Plan consists of two main components. The first component is the Four Factor Analysis which SRTA has used to determine its key affected LEP communities. The second component is an Access Plan which addresses how the authority is to provide services to LEP individuals, train employees, and monitor and update the program.

II. Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Program

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

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people’s lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

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

III. The Four Factor Analysis

This plan is based on the Four Factor Analysis outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to ensure meaningful access to Xpress services by LEP persons.

Factor 1: The Number or Proportion of LEP Persons Eligible or Likely to be Encountered by the Xpress Service

As of December 2019, the Xpress commuter service operates 25 routes from 27 park-and-ride lots throughout the metropolitan Atlanta region, focusing primarily on destinations within the Atlanta urban core (see Figure 1). Given the large service area, Census data covering the entire metropolitan Atlanta
region are used to estimate the number or proportion of LEP persons eligible or likely to be encountered by the Xpress service.

Figure 3: Xpress System Map
Based on the US Census Bureau's American Community Survey (ACS) 5-Year Estimates for 2017, approximately eight percent of the residents of the 13-county GRTA jurisdiction age 5 or older speak English less than “very well.” Table 1 evaluates the LEP population according to the primary language spoken at home, indicating that the LEP persons most likely to be encountered by GRTA are those who speak Spanish (4.56% of the region’s population), Vietnamese (0.50%), Korean (0.47%), and Chinese (0.44%).

The maps located in Appendix D show the geographic concentrations of the LEP population for Spanish, Korean, Vietnamese, Chinese and African Language speakers. The actual proportion of LEP persons encountered by Xpress service may differ from these rates due to differences in the geographic distribution of residences of LEP persons relative to the locations of Xpress park-and-ride facilities or due to differences in the commuting patterns of LEP persons relative to the primary travel markets served by Xpress.

Table 1 – Language Spoken at Home by Population 5 Years and Over that Speak English Less than Very Well

<table>
<thead>
<tr>
<th>Language Spoken at Home (Other than English)</th>
<th>Population of 13-County Region that Speaks English:</th>
<th>Population of Language Speakers</th>
<th>% of Language Speakers Speak English:</th>
<th>% of Region Population Speak English:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Very Well</td>
<td>Less than Very Well</td>
<td>Less than Very Well</td>
<td>Less than Very Well</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>244,037</td>
<td>203,918</td>
<td>447,955</td>
<td>45.52%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>12,344</td>
<td>22,489</td>
<td>34,833</td>
<td>64.56%</td>
</tr>
<tr>
<td>Korean</td>
<td>15,881</td>
<td>21,085</td>
<td>36,966</td>
<td>57.04%</td>
</tr>
<tr>
<td>Chinese</td>
<td>18,842</td>
<td>19,517</td>
<td>38,359</td>
<td>50.88%</td>
</tr>
<tr>
<td>African languages</td>
<td>36,319</td>
<td>14,643</td>
<td>50,962</td>
<td>28.73%</td>
</tr>
<tr>
<td>Other Asian languages</td>
<td>20,319</td>
<td>8,601</td>
<td>28,920</td>
<td>29.74%</td>
</tr>
<tr>
<td>Other Indic languages</td>
<td>11,786</td>
<td>7,450</td>
<td>19,236</td>
<td>38.73%</td>
</tr>
<tr>
<td>French (incl. Patois, Cajun)</td>
<td>24,923</td>
<td>6,959</td>
<td>31,882</td>
<td>21.83%</td>
</tr>
<tr>
<td>Russian</td>
<td>8,059</td>
<td>5,398</td>
<td>13,457</td>
<td>40.11%</td>
</tr>
<tr>
<td>French Creole</td>
<td>9,846</td>
<td>4,953</td>
<td>14,799</td>
<td>33.47%</td>
</tr>
<tr>
<td>Gujarati</td>
<td>9,547</td>
<td>4,929</td>
<td>14,476</td>
<td>34.05%</td>
</tr>
<tr>
<td>Hindi</td>
<td>17,355</td>
<td>4,269</td>
<td>21,624</td>
<td>19.74%</td>
</tr>
<tr>
<td>Arabic</td>
<td>9,381</td>
<td>4,174</td>
<td>13,555</td>
<td>30.79%</td>
</tr>
<tr>
<td>Portuguese or Portuguese Creole</td>
<td>6,903</td>
<td>3,491</td>
<td>10,394</td>
<td>33.59%</td>
</tr>
<tr>
<td>Other Indo</td>
<td>6,362</td>
<td>3,223</td>
<td>9,585</td>
<td>33.63%</td>
</tr>
<tr>
<td>Persian</td>
<td>4,057</td>
<td>3,021</td>
<td>7,078</td>
<td>42.68%</td>
</tr>
<tr>
<td>Serbo</td>
<td>3,727</td>
<td>2,496</td>
<td>6,223</td>
<td>40.11%</td>
</tr>
<tr>
<td>Japanese</td>
<td>3,501</td>
<td>2,341</td>
<td>5,842</td>
<td>40.07%</td>
</tr>
<tr>
<td>Urdu</td>
<td>6,337</td>
<td>2,242</td>
<td>8,579</td>
<td>26.13%</td>
</tr>
<tr>
<td>Mon</td>
<td>2,177</td>
<td>2,102</td>
<td>4,279</td>
<td>49.12%</td>
</tr>
<tr>
<td>Language</td>
<td>2017 Home</td>
<td>2017 Work</td>
<td>2017 Total</td>
<td>Proficiency</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------</td>
<td>-----------</td>
<td>------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Tagalog</td>
<td>5,179</td>
<td>1,896</td>
<td>7,075</td>
<td>26.80%</td>
</tr>
<tr>
<td>Laotian</td>
<td>2,643</td>
<td>1,613</td>
<td>4,256</td>
<td>37.90%</td>
</tr>
<tr>
<td>Other Slavic languages</td>
<td>2,692</td>
<td>1,397</td>
<td>4,089</td>
<td>34.16%</td>
</tr>
<tr>
<td>German</td>
<td>10,922</td>
<td>1,361</td>
<td>12,283</td>
<td>11.08%</td>
</tr>
<tr>
<td>Thai</td>
<td>1,913</td>
<td>1,304</td>
<td>3,217</td>
<td>40.53%</td>
</tr>
<tr>
<td>Other Pacific Island languages</td>
<td>1,567</td>
<td>1,301</td>
<td>2,868</td>
<td>45.36%</td>
</tr>
<tr>
<td>Polish</td>
<td>1,867</td>
<td>649</td>
<td>2,516</td>
<td>25.79%</td>
</tr>
<tr>
<td>Italian</td>
<td>2,256</td>
<td>594</td>
<td>2,850</td>
<td>20.84%</td>
</tr>
<tr>
<td>Other and unspecified languages</td>
<td>496</td>
<td>379</td>
<td>875</td>
<td>43.31%</td>
</tr>
<tr>
<td>Other West Germanic languages</td>
<td>3,151</td>
<td>319</td>
<td>3,470</td>
<td>9.19%</td>
</tr>
<tr>
<td>Greek</td>
<td>1,796</td>
<td>294</td>
<td>2,090</td>
<td>14.07%</td>
</tr>
<tr>
<td>Hungarian</td>
<td>562</td>
<td>207</td>
<td>769</td>
<td>26.92%</td>
</tr>
<tr>
<td>Hmong</td>
<td>718</td>
<td>171</td>
<td>889</td>
<td>19.24%</td>
</tr>
<tr>
<td>Scandinavian languages</td>
<td>1,895</td>
<td>121</td>
<td>2,016</td>
<td>6.00%</td>
</tr>
<tr>
<td>Armenian</td>
<td>151</td>
<td>83</td>
<td>234</td>
<td>35.47%</td>
</tr>
<tr>
<td>Hebrew</td>
<td>2,380</td>
<td>71</td>
<td>2,451</td>
<td>2.90%</td>
</tr>
<tr>
<td>Other Native North American languages</td>
<td>499</td>
<td>58</td>
<td>557</td>
<td>10.41%</td>
</tr>
<tr>
<td>Yiddish</td>
<td>310</td>
<td>31</td>
<td>341</td>
<td>9.09%</td>
</tr>
<tr>
<td>Navajo</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

Source: ACS 2017, Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over.

Note: the margin of error for estimates of smaller sized populations are significant and therefore much less certain.

**Factor 2: Frequency of Contact with LEP Individuals**

LEP persons may interact with Xpress commuter bus service through one of four primary contact points: on an Xpress vehicle, via telephone with customer service, in-person at the customer service center or at public meetings, and/or through the xpressga.com website. These four primary points of contact are monitored by SRTA to estimate the frequency with which LEP persons come into contact with the Xpress service. Monitoring occurs via an On-Board Customer Survey, surveys of Xpress drivers, a survey of the customer service team, and an evaluation of Xpress call center data. The monitoring results indicate that less than 1% of customer interactions with Xpress service are with LEP individuals.

The most recent Xpress On-Board Customer Survey was conducted in 2014 and contained two questions regarding the primary language spoken at home and English proficiency:
Printed surveys were available in both English and Spanish, and additional translations were available upon request. During the administration of the survey, no additional translations were requested. Based on the survey, 4.56% of Xpress riders speak Spanish most often at home and identify as speaking English less than “very well.” This is less than might be expected based on the Census estimate of the metropolitan Atlanta population that speaks Spanish and speaks English less than “very well” (7.92%) and may be due to differences in the geographic distribution of residences of Spanish-speaking LEP persons relative to the locations of Xpress park and ride facilities. It may also be due to differences in the commuting patterns of Spanish-speaking LEP persons compared to the primary travel markets served by Xpress.

The Xpress and SRTA websites serve as other primary points of contact with customers. SRTA utilizes Google Translate to assist LEP persons. A summarization of usage from Jan 1, 2018 to Dec 20, 2018 for the SRTA website indicates that the website was visited just over 59,000 times and translated to a language other than English 1,538 times (2.6%).

*Information for the translation rates of the Xpress website is not available as of January 3, 2020 and will be updated prior to the beginning of public engagement and board approval.*
Table 2- Language Spoken at Home by Route

<table>
<thead>
<tr>
<th>Route</th>
<th>English</th>
<th>Japanese</th>
<th>Korean</th>
<th>Mandarin</th>
<th>Cantonese</th>
<th>Spanish</th>
<th>Vietnamese</th>
<th>Other</th>
<th>TOTAL</th>
<th>% LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>400</td>
<td>49</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>61</td>
<td>1.5%</td>
</tr>
<tr>
<td>401</td>
<td>28</td>
<td></td>
<td>1</td>
<td></td>
<td>3</td>
<td>8</td>
<td>40</td>
<td></td>
<td></td>
<td>2.5%</td>
</tr>
<tr>
<td>408</td>
<td>31</td>
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<td>1</td>
<td></td>
<td></td>
<td>3</td>
<td>36</td>
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<td>55</td>
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<td></td>
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<td>5</td>
<td>2</td>
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<td>136</td>
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<td></td>
<td>1</td>
<td>47</td>
<td>2.1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>419</td>
<td>198</td>
<td>2</td>
<td></td>
<td></td>
<td>1</td>
<td>8</td>
<td>209</td>
<td></td>
<td>1.0%</td>
<td></td>
</tr>
<tr>
<td>423</td>
<td>174</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>174</td>
<td></td>
<td></td>
<td>0.6%</td>
</tr>
<tr>
<td>426</td>
<td>267</td>
<td></td>
<td></td>
<td>3</td>
<td>1</td>
<td>2</td>
<td>273</td>
<td></td>
<td>1.9%</td>
<td></td>
</tr>
<tr>
<td>428</td>
<td>53</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>53</td>
<td></td>
<td>2.0%</td>
<td></td>
</tr>
<tr>
<td>430</td>
<td>150</td>
<td></td>
<td></td>
<td>5</td>
<td>2</td>
<td>157</td>
<td>1.3%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>431</td>
<td>91</td>
<td>1</td>
<td></td>
<td>2</td>
<td>1</td>
<td>95</td>
<td>0.0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>432</td>
<td>147</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>151</td>
<td></td>
<td>1.3%</td>
<td></td>
</tr>
<tr>
<td>440</td>
<td>112</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>114</td>
<td>2.7%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>441</td>
<td>80</td>
<td>2</td>
<td></td>
<td>1</td>
<td></td>
<td>83</td>
<td>1.2%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>442</td>
<td>40</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td>43</td>
<td>2.5%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>453</td>
<td>122</td>
<td>2</td>
<td></td>
<td>5</td>
<td>1</td>
<td>130</td>
<td>0.8%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>463</td>
<td>210</td>
<td>1</td>
<td></td>
<td>1</td>
<td>3</td>
<td>215</td>
<td>0.5%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>476</td>
<td>142</td>
<td></td>
<td></td>
<td>3</td>
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<td>145</td>
<td>3.5%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>480</td>
<td>60</td>
<td></td>
<td></td>
<td>9</td>
<td>3</td>
<td>72</td>
<td>0.0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>482</td>
<td>22</td>
<td></td>
<td></td>
<td>1</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>483</td>
<td>99</td>
<td></td>
<td></td>
<td>1</td>
<td>2</td>
<td>102</td>
<td>1.0%</td>
<td></td>
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<td></td>
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<tr>
<td>490</td>
<td>63</td>
<td></td>
<td></td>
<td>2</td>
<td></td>
<td>65</td>
<td>1.5%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grand Total</td>
<td>2,699</td>
<td>2</td>
<td>14</td>
<td>11</td>
<td>3</td>
<td>61</td>
<td>6</td>
<td>59</td>
<td>2,855</td>
<td>1.4%</td>
</tr>
</tbody>
</table>

SRTA received a total of 59 responses for languages other than the 7 that were provided. Of these responses, 14 responders selected Telugu, 7 selected Hindi, and 6 selected Gujarati. Three or less responders selected Creole, Malayalam, Filipino, Punjabi, Tamil, Urdu, American Sign Language, Bengali, Bosnian, Czech, French, German, Hindi-Gwarati, Hmong, Indian, Portuguese, Russian, Swahili, Urdu-Hindi, or Toruba.

Lastly, the Xpress Customer Call Center (CSC) records data on the type and number of calls received both in house and through its Language Line translation services. The CSC provides calls in both English and Spanish and Language Line provides over 200 languages. On average, the CSC receives 25,000 calls per year. For calendar year 2019 averages, please see the Table 7 below.
### Table 3- Average Type and Number of Calls at SRTA

<table>
<thead>
<tr>
<th>Type of Calls</th>
<th>Number of Calls</th>
<th>% of Calls Requiring Translation</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSC Non-Xpress-related Calls</td>
<td>22,996</td>
<td></td>
</tr>
<tr>
<td>*Spanish Calls</td>
<td>464</td>
<td>2.0%</td>
</tr>
<tr>
<td>Xpress-related Calls</td>
<td>2,258</td>
<td></td>
</tr>
<tr>
<td>*Spanish Calls</td>
<td>3</td>
<td>0.1%</td>
</tr>
</tbody>
</table>

*All calls requiring translation were requested in Spanish

**Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community**

The Xpress bus service is designed to transport passengers to and from work. Primarily, Xpress routes operate between the suburban counties and the major business districts. The Xpress service is potentially of significant importance to the LEP community, particularly those who are transit-dependent and live or work in the markets served by Xpress.

**Factor 4: The Resources Available to SRTA and Overall Cost**

SRTA has several resources available to provide information and translation assistance to LEP persons. These resources include but are not limited to Language Line translation services, regular ridership surveys monitoring LEP interaction and conducted in languages other than English, advertising for public outreach, and training for staff and drivers.

The total costs associated with SRTA’s LEP monitoring and outreach are estimated to be $35,000 in a given year. These include the costs associated with the Xpress service to conduct a ridership survey (a valuable tool for monitoring LEP interaction), Language Line translation services, placing public outreach notices in newspapers, providing printed translatable documents as needed and training staff and drivers on SRTA’s LEP plan. Additional resources can be allocated to translation services if needed.

**Conclusion**

The Four Factor Analysis outlined above indicates that Xpress has relatively infrequent interaction with LEP individuals (< 1% of passengers). Although the Atlanta region has a sizable LEP population, this may be due to difference in geographic distribution of residences of LEP persons relative to the locations of Xpress park and ride facilities or due to differences in the commuting patterns of LEP persons relative to the primary travel markets served by Xpress. Regardless, SRTA is committed to providing meaningful access to LEP individuals through SRTA’s LEP Access Plan.

**IV. Limited English Proficiency Access Plan**

Based on results from the Four Factor Analysis, the Limited English Proficiency Access Plan outlines how SRTA will provide language assistance services, to notify LEP persons about the availability of language assistance services, and provide for the monitoring of the Authority’s efforts and updating of the Access Plan.

To prepare the Access Plan, SRTA has focused on the points of potential contact and interactions with LEP individuals and communities. The points of contact identified are on the Xpress vehicles, by
telephone (call center), in-person (customer service center, public meetings/hearings), and via the Xpress website. The appropriate type of LEP assistance varies depending on the interaction point.

1. **Language Assistance Services by Interaction Point**
   - **Xpress Vehicles**: On an Xpress vehicle, SRTA will provide “Language Assistance Cards” onboard every Xpress coach in service. These cards may be used by bus operators to communicate with the LEP individuals and to connect them with the Xpress Customer Service Center where interpretative services are available.
   - **Telephone**: The Xpress call center provides multiple options to communicate with LEP individuals. These include:
     - The use of an automated system with choices of English or Spanish assistance, as Spanish is the alternative language with which the Authority has the most frequent interaction.
     - Upon reaching the call center, operators have been trained to assist LEP individuals by connecting them with the Language Line interpretation service. SRTA will continue to fund the Language Line service as it is a primary means to ensure LEP language assistance.
   - **In-Person**: There are primarily two types of in-person interactions: face-to-face encounters at the Customer Service Center and at public meetings/hearings. Regardless of the specific location, there are several ways in which SRTA seeks to communicate with LEP individuals. These include:
     - The use of “I Speak” cards. These are available at the Customer Service Center and are present with SRTA staff at all public meetings/hearings. These cards allow the LEP individual to identify their spoken language. The staff member is then able to contact the Language Line interpretive services for assistance. In the event the LEP person is unable to identify their spoken language, the staff member will still contact Language Line services who will be able to assist in identifying the proper language.
     - The Customer Service staff also have access to the Xpress website which provides translated materials via Google Translate for additional assistance in person.
   - **Website**: The website allows users to select the language including Chinese, French, Korean, Spanish, and Vietnamese as they are the largest LEP populations in the region. The website may also be translated into alternative languages for LEP persons via Google Translate.

2. **Plan to Notify LEP Persons of Language Assistance Availability**
   - **Xpress Vehicles**: On an Xpress vehicle, the placement of “Language Assistance Cards” provides LEP individuals with access to a means of communicating their language assistance needs with the Customer Service Center.
   - **Telephone**: The Customer Service Center utilizes the Language Lines service to provide language assistance as necessary.
   - **In-Person**: Customer Service Center staff and SRTA staff at public meetings/hearings will have “I Speak” cards available and Language Line ready in event LEP assistance is required. Staff will determine the type of assistance needed. If written documentation is requested, SRTA staff will follow up with the LEP person and provide appropriate written documentation free of charge,
whether via printed copies or through advising LEP person of the option to use Google Translate on the Xpress website.

- **Website:** The Xpress website provides language assistance with the use of Google Translate. It provides fully translatable HTML text in Spanish, Korean, Chinese, and Vietnamese. Text on the website which is viewable via Google Translate directs LEP individuals to the Customer Service Center contact information so that additional assistance may be provided through Language Line.

### 3. Monitoring, Evaluation, and Updates to the Language Access Plan

Annually, SRTA evaluates the effectiveness of the LAP including:

- The automated telephone assistance line is monitored for the number of calls received, number of requests for Spanish assistance and the number of Spanish assistance requests that result in a transfer to a live operator.
- The Language Line interpretation service reports the number of calls directed to it by Xpress. Additionally, this information specifically identifies the language requested by the caller.
- Customer Service Center employees are verbally surveyed to determine their level of interaction with LEP individuals. Additionally, Customer Service staff maintains a telephone log of their contact with individuals and note their interaction with LEP persons.
- SRTA staff involved in outreach efforts keep a log of the type of language assistance requested.
- SRTA staff track the frequency with which Google Translate is used, the language selected, and the type of information translated.

The above monitoring activities feed into each subsequent Four Factor Analysis and LEP Access Plan update. Each subsequent Four Factor Analysis serves to evaluate the current plan and to identify additional steps which may improve our internal efficiency while positively affecting the accessibility for LEP persons. This evaluation and update will occur at least once every three years.

### 4. Employee Training to Ensure Timely and Reasonable Language Assistance to LEP Populations

As noted above under how SRTA provides language assistance services, the authority has attempted to simplify the interaction process for all of its employees by focusing on the way in which staff members come into contact with LEP individuals. This process provides a convenient and responsive program which is capable of maintaining a high level of accessibility for our Xpress customers. To ensure the process works properly, it is imperative that staff members be trained to respond appropriately to their intended interaction point. As such, the following training techniques apply:

- All applicable Xpress staff (e.g., Customer Service representatives, public meeting/hearing representatives, etc.) are provided with the LEP Plan and will be educated on procedures to follow.
- Training topics include:
  - Understanding the Title VI Program and LEP responsibilities;
  - Explanation of the language assistance services SRTA offers, with a focus upon likely interaction types for each staff member;
  - How to use the LEP “I Speak” cards;
  - How to access translation services via the Xpress website;
  - How to use the Language Line interpretation service;
Documenting language assistance requests; and
How to handle a Title VI and/or LEP complaint.

Any questions or comments regarding this plan should be directed to the SRTA Title VI Coordinator.

SRTA Title VI Coordinator
State Road and Tollway Authority
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30303
Phone: 1-844-977-7742
Fax: 404-893-6160
Email: TitleVI@srsa.ga.gov
March 13, 2018

Ms. Annie Gillespie
State Road & Tollway Authority
245 Peachtree Center Avenue, Suite 2200
Atlanta, GA 30303

RE: Categorical Exclusion – Sugarloaf Park and Ride

Dear Ms. Gillespie:

The Federal Transit Administration (FTA) has received and reviewed the Categorical Exclusion (CE) documentation submitted by your office on February 1, 2018 for the subject project ("Project"). Based on our review of the material submitted, the project qualifies as a CE pursuant to 23 CFR 771.118(d).

If there are changes to the Project, you must notify FTA in writing. You are required to consult with FTA prior to requesting major approvals or grant awards for this Project to determine the validity of this CE. FTA will determine if any additional environmental review will be required. FTA may require reevaluation of this CE for compliance with other statutes at its discretion.

Please attach this signed CE concurrence letter from FTA, the CE document, and supporting documentation to the TrAMS grant for the above referenced project. If we can be of further assistance, please contact Mr. Stan Mitchell or Ms. Carrie Walker of my staff at 404-865-5643/5645 or stanley.a.mitchell@dot.gov/julia.walker@dot.gov.

Sincerely,

Yvette G. Taylor, Ph.D.
Regional Administrator
Appendix I – Equity Analysis Memorandum, Board Presentation, and Board Approval

Figure 1: SRTA Memorandum

Memorandum

To: Gail Franklin, Chief Transit Officer
From: Parker Martin, Senior Performance Analyst
Subject: Results of Equity Analysis for Changes to Xpress Fare Policy
Date: 01/09/2018

OVERVIEW

To better integrate with regional transit fare products and reduce operational costs of multiple fare systems, SRTA is planning to make several changes to the Xpress commuter bus fare structure. Included in the changes is a phasing out of the existing magnetic tickets used for round-trip, multi-trip, and monthly fares. These fare products are also currently available on Breeze Cards. In addition, it is proposed to reduce the cost of the Green Zone Calendar Monthly fare (proposed to be made exclusively available to TMA, SECAP, and bulk order customers) from $100 to $90.

The proposed phasing out of the magnetic tickets will not result in an increase or decrease in the cost of any Xpress fare. However, with the elimination of the magnetic fare media, all riders who utilize either the round-trip, multi-trip, 31-day, or calendar monthly fares (the only fare products available on magnetic passes) will need to possess a Breeze Card which carries a two-dollar ($2.00) upfront surcharge.

This surcharge represents a cost of using the SRTA Xpress service and therefore requires an equity analysis to determine whether or not the surcharge disproportionately impacts minority and low-income riders.

The second proposed change to the Xpress fare structure is a change in the monthly product available to bulk order customers. Currently, only Transportation Management Associations (TMA) may purchase calendar monthly fare products at $100 per month for Green Zone riders and $125 per month for Blue Zone riders. It is proposed to make calendar monthly fare products available to SECAP and other bulk order customers as well. In order to provide a similar per trip discount for Green Zone riders compared to Blue Zone riders, it is proposed that the calendar monthly fare product for Green Zone riders be decreased to $90. All other riders who purchase their own fares will be able to purchase a 31-day monthly fare product at a rate of $100 per month for Green Zone riders and $125 for Blue Zone riders.
BACKGROUND

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The State Road and Tollway Authority (SRTA) and its Xpress commuter service are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.

As a transit provider operating 50 or more fixed route vehicles in peak service that is located in an urbanized area of 200,000 or more in population, SRTA is required to analyze the impacts of any fare change on minority and low-income riders as required Section IV.7 of FTA C 4702.1B.

Title VI guidance also requires that SRTA develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). These policies must establish a threshold for determining when adverse effects of a fare change are borne disproportionately by minority and/or low-income populations. It is SRTA’s policy that the effects of any fare change will be considered disparate and/or disproportionate if the percent change in average cost per trip for minority or low-income riders differs more than 5 percentage points from the percent change for the overall ridership.

METHODOLOGY

The current proposed changes to the Xpress fare system are 1) phasing out of the magnetic fare tickets, and 2) a reduction in the cost for the Green Zone calendar monthly fare product. In order to estimate the impacts of the proposed fare change with available data, the following assumptions were made:

- SRTA’s definition of low-income is consistent with the U.S. Department of Health and Human Services (HHS) poverty guidelines. Using the poverty guidelines and the average household size for Xpress riders, the Xpress low-income threshold would be $20,340 per household. However, based on the income categories in the 2014 Xpress Ridership Survey, a low-income threshold of $30,000 was used in this analysis. This definition is at least as inclusive as the threshold defined by the HHS poverty guidelines.

- Based on currently available data, it is not possible to determine how many existing Xpress riders using the magnetic fare passes will need to purchase a Breeze card. It is assumed that all existing users of magnetic passes will be required to purchase a new Breeze card with the $2 up-front cost. This equity analysis evaluates whether or not the segment of the rider base that is expected to be impacted by the change is representative of, or differs significantly from, the demographics of Xpress ridership as a whole.

- At the time of the analysis, data segmenting riders using calendar monthly passes from other riders was unavailable. For this reason, it cannot be determined what segment of the riders using calendar monthly fare product will be impacted by the reduction of the Green Zone calendar monthly fare product. In order to analyze the benefits of the proposed fare change compared to the ridership as a whole, it was assumed that the fraction of riders self-identified in the 2014
Xpress On-Board Survey as using Green Zone 31-day fare products will receive the proposed discount.

RESULTS OF FARE CHANGE EQUITY ANALYSIS

Based on the demographic analysis of riders who would likely be impacted by the proposed fare change, the results do not indicate that there will be a disparate impact to minority riders nor will the proposed changes disproportionately burden low income riders. A detailed analysis of the impacts the proposed fare changes will have on minority and low-income customers may be found in Appendix A and Appendix B.
Appendix A: Phasing Out Magnetic Tickets

For the purposes of analyzing the impacts of the proposed change to eliminate magnetic fare media, ridership and fare usage data from the 2014 Xpress On-board Survey was used to determine whether minority and low income riders are expected to be impacted by the Breeze card cost more than non-minority and non-low income riders. As shown in Table 1, a higher percentage of non-minority riders (79%) use magnetic fare tickets than minority riders (65%). The results are similar when comparing magnetic fare usage for non-low income riders (73%) and low income riders (46%).

Table 1: Percent Magnetic Fare Usage by Rider Group

<table>
<thead>
<tr>
<th>Rider Group</th>
<th>Percent Using Magnetic Tickets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority</td>
<td>65%</td>
</tr>
<tr>
<td>Non-Minority</td>
<td>79%</td>
</tr>
<tr>
<td>Low Income</td>
<td>46%</td>
</tr>
<tr>
<td>Non-Low Income</td>
<td>73%</td>
</tr>
</tbody>
</table>

Based on the above results, it is expected that a larger share of non-minority and non-low income riders will be impacted by the Breeze card cost than minority and low-income riders. Therefore, the proposed change is not expected to adversely affect minority or low-income riders.

As a mitigation strategy to help offset the costs for all riders transitioning to Breeze cards, it is SRTA’s plan to offer free Breeze cards during upcoming Xpress outreach events.
Appendix B: Reduction of Green Zone Calendar Monthly Fare Product

At the time of this analysis, there are two monthly fare products for both the Green Zone and Blue Zone (see Table 2). Compared to the 10-trip passes for both zones, Blue Zone monthly riders currently receive an approximately 10% discount per trip. Green Zone monthly riders however do not see a per-trip cost advantage. To provide a similar discount for the calendar monthly fare users, it is proposed that the Green Zone calendar monthly fare product be reduced from $100 to $90.

Table 2: Proposed changes to Green Zone Calendar Monthly Fare Product

<table>
<thead>
<tr>
<th>Product</th>
<th>Existing</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Green Zone</td>
<td>Blue Zone</td>
</tr>
<tr>
<td>One-Way</td>
<td>$3</td>
<td>$4</td>
</tr>
<tr>
<td>Round-Trip</td>
<td>$5</td>
<td>$7</td>
</tr>
<tr>
<td>10-Trip</td>
<td>$25</td>
<td>$35</td>
</tr>
<tr>
<td>31-Day</td>
<td>$100</td>
<td>$125</td>
</tr>
<tr>
<td>Calendar</td>
<td>$125</td>
<td></td>
</tr>
</tbody>
</table>

As noted above, not all riders will be eligible to purchase the discounted calendar monthly fare product as that will only be available for bulk order purchasers of fare products. As the data from the 2014 On-Board Survey does not allow for segmentation by bulk order purchasers, it is assumed that all existing Green Zone monthly riders will observe a 10% per-trip reduction in their fares.

The current threshold for determining disparate impacts and disproportionate burdens is any change in which the difference between minority and low-income riders the overall ridership differs by more than 5 percentage points. Comparing the impact of this change on minority and low-income riders to the impacts on the overall ridership, indicates that there are no adverse impacts on minority and low-income riders.

Table 3: Cost per Trip Change with Reduction of Green Zone Calendar Monthly Fare

<table>
<thead>
<tr>
<th>Rider Group</th>
<th>Existing Average Cost per Trip</th>
<th>Proposed Average Cost per Trip</th>
<th>Percent Change in Cost per Trip</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority</td>
<td>$2.98</td>
<td>$2.95</td>
<td>-0.95%</td>
</tr>
<tr>
<td>Low-Income</td>
<td>$3.02</td>
<td>$3.01</td>
<td>-0.29%</td>
</tr>
<tr>
<td>Overall Ridership</td>
<td>$3.00</td>
<td>$2.98</td>
<td>-0.95%</td>
</tr>
</tbody>
</table>
Fare Payment Media Changes are Proposed for 2018

- Eliminating Magnetic Stripe Tickets
- Expanding the use of Breeze Cards
- Reducing Green Zone Calendar Monthly Fare from $100 to $90
- All fares currently available on Magnetic Tickets will be available on the Breeze Card
Fare Payment Media Changes are Proposed for 2018

- Change must be completed prior to installation of new fare boxes on Xpress Bus.
- A minimum of six months notice will be given to the public.
- No refund of unused Magnetic Tickets is proposed.

Title VI Effort for Breeze Migration

- Required by Federal Law any time a fare change is proposed.
- SRTA has an adopted Title VI Plan which provides for public comment & hearing before the GRTA Board & was followed in this effort.
- Analysis performed by SRTA indicated that there are no disparate impacts.
- The ability of the public to provide input is a key element of any Title VI effort.
Title VI Outreach for Breeze Migration

- Public Comment was accepted from Nov 14 – Dec 15, 2017 via online forms, telephone & Public Hearings
- Seat Drops were placed on all Xpress Buses by November 13.
- A Banner and link to more information was placed on the Xpress website on November 13.
- Notices were issued in 4 languages and placed in 8 publications late in November advertising the Public Hearing and Public Outreach.

Today’s Actions

- Consider approval of the following GRTA recommendations:
  1. Discontinue use of Magnetic Tickets & provide fare products on Breeze Only.
  2. Discontinue acceptance of existing Magnetic Tickets no earlier than December 31, 2018.
  3. Approve the proposed fare reduction for the Green Zone Calendar Monthly fare from $100 to $90.
Questions?
RESOLUTION OF THE STATE ROAD AND TOLLWAY AUTHORITY
APPROVING THE ELIMINATION OF XPRESS MAGNETIC FARE MEDIA AND FARE REDUCTION FOR GREEN ZONE CALENDAR MONTHLY PRODUCTS

Resolution #2018.01.31.02

WHEREAS, the State Road and Tollway Authority ("SRTA") operates and manages the Xpress Commuter Transit Service ("Xpress Service") pursuant to O.C.G.A. §§ 32-10-60 through 32-10-135; and

WHEREAS, the Georgia Regional Transportation Authority Board of Directors ("GRTA Board") serves as a Transit Advisory Board to the SRTA Board of Directors ("SRTA Board"), providing input to the SRTA Board concerning Title VI program changes; proposed major service changes; proposed fare changes; or, on any other transit matter as requested by the SRTA Board; and

WHEREAS, the GRTA Board, acting as SRTA’s Transit Advisory Board, also receives and evaluates public comment as required by SRTA’s Title VI Program and as may otherwise be required by FTA in regards to Xpress Service and makes recommendations for actions to the SRTA Board based upon the public comments received; and

WHEREAS, pursuant to SRTA’s Title VI policies, a public comment period was held from November 14, 2017 to December 15, 2017 and a public hearing was held on December 5, 2017 regarding the proposed elimination of magnetic fare tickets from the Xpress fare system no earlier than December 31, 2018 and a proposed reduction of the Green-Zone Calendar Monthly fare product from $100 to $90 (collectively, the “Proposed Changes”); and

WHEREAS, 66 comments were received from the public during the public comment period and public hearing; and

WHEREAS, staff conducted a Title VI fare equity analysis and found no adverse impacts on minority and low-income riders due to the Proposed Changes, and presented this analysis to the GRTA Board;

WHEREAS, by Resolution dated January 10, 2018 (attached), the GRTA Board recommended that the SRTA Board to approve the Proposed Changes.

NOW, THEREFORE, BE IT RESOLVED:

1. that the elimination of magnetic fare tickets from the Xpress fare system no earlier than December 31, 2018 is approved; and

2. the reduction of the Green-Zone Calendar Monthly fare product from $100 to $90 is approved.

APPROVED this 31st day of January 2018.

STATE ROAD AND TOLLWAY AUTHORITY

By: [Signature]
Governor Nathan Deal, Chairman

Attest:

[Signature]
Christopher Tomlinson, Secretary