



TITLE VI PROGRAM UPDATE

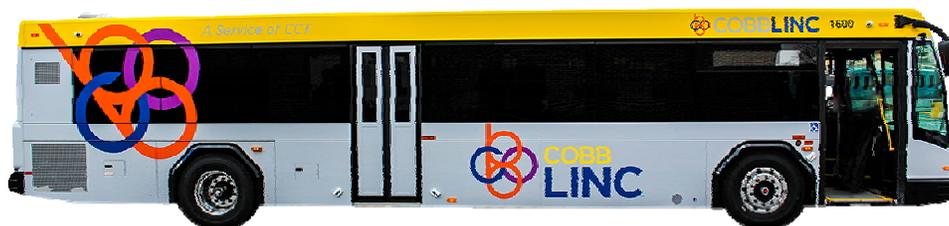


Prepared For:
The Federal Transit Administration

Submitted by:
Cobb County, Georgia
Cobb County Department of Transportation – Transit Division
CobbLinc

CobbLinc.org
TitleVI@cobbcounty.org

Approved by the Cobb County Board of Commissioners
February 2018





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TITLE VI NON-DISCRIMINATION AGREEMENT

Cobb County, Georgia

Cobb County Department of Transportation – Transit Division



Policy Statement

CobbLinc assures that no person shall on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. CobbLinc assures every effort will be made to ensure non-discrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

The Civil Rights Restoration Act of 1987, broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors/consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [S.557] March 22, 1988.)

In the event CobbLinc distributes federal funds to another entity, CobbLinc will monitor and ensure the compliance of each third party contractor at any tier and each sub-recipient at any tier under the project, with all requirements prohibiting discrimination on the basis of race, color, or national origin; and will include non-discrimination language in all written agreements.

Any person believing they have been discriminated against based on race, color, or national origin in the provision of services, programs, activities, or benefits, may file a formal complaint directly with CobbLinc or with the Federal Transit Administration.



Michael H. Boyce

Chairman, Cobb County Board of Commissioners

Title

Date

3/12/18

Approved As To Form:

COUNTY ATTORNEY'S OFFICE

APPROVED
PER MINUTES OF
COBB COUNTY
BOARD OF COMMISSIONERS

2/13/18

RESOLUTION

Resolution authorizing the approval and submission of a Title VI Program Update to the Federal Transit Administration, an operating administration of the United States Department of Transportation, for Federal transportation assistance authorized by 49 U.S.C. chapter 53, title 23 United States Code and other Federal statutes administered by the Federal Transit Administration.

WHEREAS, the Federal Transit Administration (FTA) requires that all direct and primary recipients document their compliance with the United States Department of Transportation's Title VI regulations by submitting a Title VI Program Update to their FTA regional civil rights officer once every three years, or as otherwise directed by FTA; and

WHEREAS, the Title VI Program Update must be approved by the recipient's Board of Directors, or appropriate governing entity or official(s) responsible for policy decisions, prior to submission to FTA; and

WHEREAS, Cobb County has provided or will provide a Title VI Program and all Annual Certifications and Assurances to the FTA;

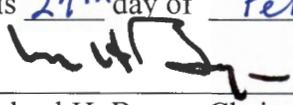
NOW, THEREFORE, BE IT RESOLVED by the Cobb County Board of Commissioners that:

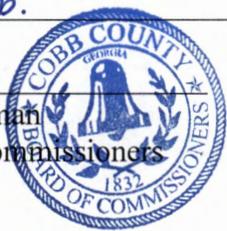
1. The Chairman of the Cobb County Board of Commissioners declares that the County is in compliance with the Federal Title VI regulations.
2. The Chairman of the Cobb County Board of Commissioners approves the Title VI Program Update.
3. The Chairman of the Cobb County Board of Commissioners confirms that the County has or will provide a Title VI Program and all Annual Certifications and Assurances to the Federal Transit Administration.

CERTIFICATION

The undersigned duly qualified Chairman of the Cobb County Board of Commissioners, acting on behalf of the Cobb County Board of Commissioners, certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Cobb County Board of Commissioners held on 2/13/18.

This 27th day of Feb., 2018


Michael H. Boyce, Chairman
Cobb County Board of Commissioners



APPROVED
PER MINUTES OF
COBB COUNTY
BOARD OF COMMISSIONERS
2/13/18

Approved As To Form:

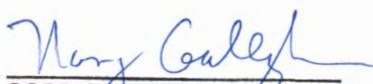

COBB COUNTY ATTORNEY'S OFFICE



TABLE OF CONTENTS

I - GENERAL REPORTING REQUIREMENTS

1. Requirement to Provide an Annual Title VI Certification and Assurance	Page 1
2. Requirement to Develop Title VI Complaint Procedure	Page 1
3. Requirement to Develop Title VI Complaint Form	Page 1
4. Requirement to Record Title VI Investigations, Complaints, and Lawsuits	Page 2
5. Requirement to Provide Meaningful Access to Limited English Proficiency Persons	Page 2
6. Requirement to Notify Beneficiaries of Protection Under Title VI	Page 2
7. Requirement to Prepare and Submit a Title VI Program	Page 2
8. Guidance on Conducting an Analysis of Construction Projects	Page 3
9. Guidance on Promoting Inclusive Public Participation	Page 5
10. Summary of all Civil Rights Compliance Reviews Conducted by Other Local, State, or Federal Agencies during the Last Three Years	Page 6
11. Racial Make-up of Transit-Related, Non-Elected Boards, Advisory Councils or Committees	Page 6
12. Requirement to Provide Narrative on Monitoring and Providing Assistance to Subrecipients	Page 6

II – PROGRAM-SPECIFIC REQUIREMENTS

13. Requirement to Collect Demographic Data	Page 6
14. Requirement to Set System-Wide Service Standards	Page 6





- | | |
|--|--------|
| 15. Requirement to Set System-Wide Service Policies | Page 7 |
| 16. Requirement to Evaluate Fare and Service Changes | Page 8 |
| 17. Requirement to Monitor Transit Service | Page 8 |

III – ATTACHMENTS

Attachment A	Certifications and Assurance
Attachment B	Title VI Complaint Procedures
Attachment B-1	Title VI Complaint Form
Attachment C	List of Transit-Related Title VI Investigations
Attachment D	Limited English Proficiency (LEP) Plan
Attachment E	Notice to the Public
Attachment F	Description of Service Changes and Their Effects on Minority and Low Income Population
Attachment F-1	Description of Mobility Improvements and Major Transit Investment Studies
Attachment G	Fixed Facility Impact Analysis of Construction Projects
Attachment H	Public Involvement Plan
Attachment I	CobbLinc – Public Participation Policy on Major Services or Fare Changes
Attachment J	Procedures for Monitoring Transit Service and Subrecipient Compliance
Attachment K	Title VI Resolution
Attachment L	Racial Make-Up of Transit-Related, Non-Elected Boards, Advisory Councils or Committees
Attachment M	Disproportionate Burden Policy
Attachment N	Transit Amenities Policy
Attachment O	Vehicle Assignment Policy
Attachment P	Disparate Impact Policy
Attachment Q	Systemwide Service Standards Policy





IV – APPENDIX

Appendix A

Limited English Proficiency (LEP)

- A-1 LEP Language Spoken at Home Table
- A-2 LEP Survey Results

Appendix B

Demographic Maps

- Map – 2011-2015 ACS: Population
- Map – 2011-2015 ACS: African American Population
- Map – 2011-2015 ACS: Hispanic Population
- Map – 2011-2015 ACS: Low-Income Population
- Map – 2011-2015 ACS: Percent White Only Population
- Map – 2011-2015 ACS: Percent Elderly Population
- Map – Activity Centers in Cobb County

Appendix C

Environmental Justice (EJ) Maps

- Map – CobbLinc’s Current Routes and Percent Minority Population
- Map – CobbLinc’s Current Routes and Percent Low-Income Population
- Map – CobbLinc’s Current Routes and Percent Limited English Proficiency (LEP) Population





Cobb County (Georgia) Title VI Update February 2018

Cobb County, a political subdivision of the State of Georgia, through its transit division of the Cobb County Department of Transportation, also known as CobbLinc, is committed to ensuring that no person in the United States shall, on the grounds of race, color, or national origin be excluded from participating in or denied the benefits of or be subject to discrimination under any program or activity receiving federal financial assistance. CobbLinc will also ensure that federal supported transit services and related benefits are distributed in an equitable manner. This program for CobbLinc provides certain general information to reflect compliance with Title VI as per FTA Circular 4702.1B.

I - GENERAL REPORTING REQUIREMENTS

1. **REQUIREMENT TO PROVIDE AN ANNUAL TITLE VI CERTIFICATION AND ASSURANCE.**

Cobb County's Fiscal Year 2017 Annual Certifications and Assurances were approved on February 28, 2017. **(Provided in Attachment A).**

2. **REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES.**

The CobbLinc Title VI Complaint Procedures are provided in **Attachment B. (Complaint Procedures)**. In order to comply with 49 CFR Section 21.9(b), CobbLinc has developed procedures for investigating and tracking Title VI complaints filed against them. Procedures for filing a complaint are made available to members of the public upon request.

3. **REQUIREMENT TO DEVELOP TITLE VI COMPLAINT FORM.**

The CobbLinc Title VI Complaint Form is provided in **Attachment B-1. (Complaint Form)**. In order to comply with 49 CFR Section 21.9(b), CobbLinc has developed procedures for investigating and tracking Title VI complaints filed against them. Procedures for filing a complaint form are made available to members of the public upon request.





4. REQUIREMENT TO RECORD TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS.

- There are no active transit-related Title VI investigations, active lawsuits, or complaints alleging discrimination on the basis of race, color, or national origin.
- In order to record and report any future alleged discrimination, CobbLinc will maintain a list of investigations, complaints, and lawsuits with their pertinent information as shown in **Attachment C. (List of Transit-Related Title VI Investigations)**

5. REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LIMITED SPEAKING POPULATION (LEP) PERSONS.

The CobbLinc Language Assistance Plan for Limited English Proficiency (LEP) population is provided in **Attachment D. (Limited English Proficiency Plan)**

6. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI.

In order to comply with 49 CFR Section 21.9(d), information to the public regarding their Title VI obligations and the protections against discrimination afforded to them by Title VI is provided by CobbLinc. Information is disseminated to the public through public notices and posting at CobbLinc transfer stations, park and ride lots, bus stops, in CobbLinc administrative and maintenance facilities, and on the CobbLinc website provided in **Attachment E. (Notice to the Public)**

a. Contents. The notice includes:

- (1) A statement that CobbLinc does not discriminate on the basis of race, color, or national origin in the provision of transportation services.
- (2) A description of the procedures that members of the public should follow in order to request additional information on CobbLinc's Title VI obligations or any sub recipient.
- (3) A description of the procedures that members of the public should follow in order to file a Title VI discrimination complaint against CobbLinc or any sub recipient.

7. REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM. FTA requires recipients to report certain general information to determine compliance with Title VI. The collection and reporting of this program constitute the recipients' Title VI



Program. To ensure compliance with 49 CFR Section 21.9(b), FTA requires that all recipients document their compliance with this chapter by submitting a Title VI Program to FTA's regional civil rights officer once every three years.

a. Contents. The submission includes the following information:

- (i) A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities.

*CobbLinc conducts a monthly Transit Service Evaluation Committee meeting for the purpose of discussing transit related issues which incorporates specific service comments and requests from the public. Media outlets are used to schedule public meetings and to provide opportunities and outlets for review and comments. Distribution to media outlets primarily serving low income and minority groups is emphasized. (See **Public Participation Policy-Attachment I**)*

- (ii) A copy of the CobbLinc's plan for providing language assistance for persons with limited English proficiency that was based on the DOT LEP Guidance.

(See Attachment E)

- (iii) A copy of the agency procedures for tracking and investigating Title VI complaints.

(See Attachment C)

- (iv) A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to the agency submitting the report, not necessarily the larger agency or department of which the entity is a part.

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

- (v) A copy of the agency's notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint.

(See Attachment E)

8. GUIDANCE ON CONDUCTING AN ANALYSIS OF CONSTRUCTION PROJECTS.

- a. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis



of Census data, minority business directories, direct observation, or a public involvement process).

- The 2011-2015 American Community Survey (ASC) data were used to identify how the minority, low-income, and Limited English Proficiency (LEP) populations are benefited by the current CobbLinc transit routes. The environmental justice (EJ) maps were created to illustrate how current routes cover the areas with a different concentration of minority, low income, and LEP populations in the County. For each map, a county average was used as a reference point to set value ranges in the legend. **(See Appendix C: Environmental Justice Maps)**
- Service equity analysis and Title VI analysis for upcoming service changes and enhancements are included in **Attachment F**. Cumberland District Circulator, Route 10X, and weekend bus services are some of the proposed service changes expected to be implemented in the near future. **(See Attachment F: Description of Service Changes and Their Effects on Minority and Low Income Population)**
- There were no storage facilities, maintenance facilities, or operations centers, etc. constructed, nor were there any site or location determination assessments of such facilities since the previous CobbLinc Title VI Program submission in 2015.
- CobbLinc will ensure that all regulations and requirements in FTA Circular 4702.1B related to Title VI guidance on conducting an analysis of construction projects are conducted and documented in the CobbLinc Title VI Program. **Attachment G** is reserved for future documentation.

b. A list of CobbLinc projects listed in the Regional TIP:

Major Mobility Improvements:

Each of the major service enhancement projects or major transit investment planning studies listed below was included in the TIP and is described in **Attachment F-1**. Each of these projects will have positive impacts on the minority community by providing new transit services that are not available now.

- (1) Park and Ride Lots
- (2) Connect Cobb Northwest Atlanta Corridor Environmental Documentation
- (3) Cobb in Motion-2040 Comprehensive Transportation Plan
- (4) Route 10X Implementation Plan
- (5) CobbLinc Transit Service Plan

*(See Description of Mobility Improvements and Major Transit Investment Studies)
(Attachment F-1)*



- c. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas. Recipients and sub recipients that determine there is no basis for such a comparison should describe why that is so.
- There were no storage facilities, maintenance facilities, or operations centers, etc. constructed, nor were there any site or location determination assessments of such facilities since the previous CobbLinc Title VI Program submission in 2015.
 - CobbLinc will ensure that all regulations and requirements in FTA Circular 4702.1B related to Title VI guidance on conducting an analysis of construction projects are conducted and documented in the CobbLinc Title VI Program. **Attachment G** is reserved for future documentation.

9. GUIDANCE ON PROMOTING INCLUSIVE PUBLIC PARTICIPATION.

In order to integrate into community outreach activities, considerations expressed in the DOT Order on Environmental Justice, and the DOT LEP Guidance, recipients and sub recipients should seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

Effective Practices for Fulfilling the Inclusive Public Participation Requirement.

- Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations from effectively participating in a recipient's decision-making process.

(See Public Involvement Plan – Attachment H and Public Participation Policy on Fare and Major Service Changes – Attachment I)



10. SUMMARY OF ALL CIVIL RIGHTS COMPLIANCE REVIEWS CONDUCTED BY OTHER LOCAL, STATE OR FEDERAL AGENCIES DURING THE LAST 3 YEARS.

- There have been no civil rights compliance reviews conducted within the last three (3) years.

11. RACIAL MAKE UP OF TRANSIT –RELATED, NON-ELECTED BOARDS, ADVISORY COUNCILS OR COMMITTEES

- CobbLinc has several committees to review various aspects of its operations and to ensure service is delivered equitably. The County strives to ensure all Committees have a diverse make-up reflective of the Community by notifying targeted community groups of vacancies as they occur and recruiting throughout the community.

(See Attachment L)

12. REQUIREMENT TO PROVIDE NARRATIVE ON MONITORING AND PROVIDING ASSISTANCE TO SUBRECIPIENTS

- The CobbLinc Narrative on Monitoring and Providing Assistance to Subrecipients is discussed in **Attachment J**.

II - PROGRAM-SPECIFIC REQUIREMENTS

13. REQUIREMENT TO COLLECT DEMOGRAPHIC DATA

- CobbLinc updated demographic data and maps for its service area within Cobb County.

(See Appendix B)

14. REQUIREMENT TO SET SYSTEM-WIDE SERVICE STANDARDS

- a) **Vehicle Load**- The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 51 passengers for low-floor 40-foot buses; 60 passengers for standard 45-foot buses.



- b) **Vehicle Headway**- Service operates every 30 minutes or better from early morning to late night, six days a week. On weekdays, 30 minutes or better service should begin no later than 5:30 a.m. and continue until 1:00 a.m. On weekends, 30 minutes or better service should begin by 6:00 a.m. and continue until 10:30 p.m.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to major transportation developments, land use connectivity, and transportation demand management.

- c) **On-time Performance**- Ninety-five (95) percent of CobbLinc's vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule/published timetables.
- d) **Distribution of Transit Amenities**- Installation of transit amenities along bus routes are based on the number of passenger boarding at stops along those routes. Distribution will be monitored to ensure there are no negative impacts along low income and minority routes when compared to non minority and non low-income routes without regard to race, color, or national origin.
- e) **Service Availability Standards**- CobbLinc will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service.

15. REQUIREMENTS TO SET SYSTEM-WIDE SERVICE POLICIES

Vehicle Assignment Policy- The age of the vehicles is not taken into consideration when assigning to routes; however low-floor buses are assigned to all local routes. All buses are maintained to run any route at any given time. Low-floor buses are deployed on frequent service and high-ridership routes and carry a higher share of ridership than their numerical proportion of the overall bus fleet. All buses are equipped with air conditioning, automated stop announcements, and security cameras. There are only low-floor 40-foot buses in the fleet designated for local service due to the operating characteristics of the routes.

Transit Security Policy- Transit Security refers to measures taken to protect CobbLinc employees and the public against any intentional act or threat of violence or personal harm, either from a criminal or terrorist act. On board vehicle surveillance cameras are distributed equitably to minority and low-income routes when compared to non minority and non low-income routes without regard to race, color, or national origin.



Deployment of Technology and Staff- CobbLinc has deployed technology in order to improve customer service and system efficiency. CobbLinc recognizes the importance of training staff to first comprehend all the features residing within a system and then to provide training until the intended users can independently use these systems.

16. **REQUIREMENT TO EVALUATE FARE AND SERVICE CHANGES.**

- Evaluation of fare and service changes is discussed in **Attachment F**.

17. **REQUIREMENT TO MONITOR TRANSIT SERVICE.**

- Transit Service Monitoring procedures are discussed in **Attachment J**.



Attachment A

Certifications and Assurances

FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES

PREFACE

Before the Federal Transit Administration (FTA or We) may award federal assistance for public transportation in the form of a federal grant, cooperative agreement, loan, line of credit, loan guarantee, master credit agreement, or State Infrastructure Bank (SIB) cooperative agreement certain pre-award Certifications and Assurances are required, except as FTA determines otherwise in writing. The Applicant must authorize a representative (Authorized Representative) to select and sign its Certifications and Assurances and bind the Applicant's compliance. You, as your Applicant's Authorized Representative, must select and sign all Certifications and Assurances that your Applicant must provide to support each application it submits to FTA for federal assistance during federal fiscal year (FY) 2017.

We request that you read each Certification and Assurance and select those that will apply to any application for which your Applicant might seek FTA assistance during FY 2017. As provided by federal laws, regulations, and requirements, FTA may award federal assistance only if the Applicant's Authorized Representative selects adequate Certifications and Assurances.

We have consolidated our Certifications and Assurances into twenty-three (23) Categories. At a minimum, you must select the Assurances in Category 01. If your Applicant requests more than \$100,000 in federal assistance, you must select the "Lobbying" Certification in Category 02, except if your Applicant is an Indian tribe, Indian organization, or an Indian tribal organization. Depending on the nature of your Applicant and the Award it seeks, you may also need to select one or more Certifications and Assurances in Categories 03 through 23. Instead of selecting individual Categories of Certifications and Assurances, however, you may make a single selection that will encompass all twenty-three (23) Categories of Certifications and Assurances that apply to our various programs.

FTA, the Applicant, and the Applicant's Authorized Representative, understand and agree that not every provision of these twenty-three (23) Categories of Certifications and Assurances will apply to every Applicant or every Award or Project included in an Award, even if you make a single selection encompassing all twenty-three (23) Categories. Nor will every provision of each Certification or Assurance within a single Category apply if that provision does not apply to your Applicant or the Award it seeks. The type of Applicant and its application will determine which Certifications and Assurances apply.

Your Applicant is ultimately responsible for compliance with the Certifications and Assurances selected that apply to its Award, itself, any Subrecipient, or any other Third Party Participant in its Award, except as FTA determines otherwise in writing. For this reason, we strongly encourage your Applicant to take appropriate measures, including,

FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES

but not limited to, obtaining sufficient documentation from each Subrecipient and any other Third Party Participant as necessary to assure your Applicant's compliance with the applicable Certifications and Assurances selected on its behalf.

Except as FTA determines otherwise in writing, if your Applicant is a team, consortium, joint venture, or partnership, it understands and agrees that you must identify the activities that each member will perform and the extent to which each member will be responsible for compliance with the selected Certifications and Assurances. You also must identify each member's role in the Award, whether as a Recipient, Subrecipient, Third Party Contractor, or other Third Party Participant.

It is important that you and your Applicant also understand that these Certifications and Assurances are pre-award requirements, generally imposed by federal law or regulation, and do not include all federal requirements that may apply to it or its Award. We expect you to submit your Applicant's FY 2017 Certifications and Assurances and its applications for federal assistance in FTA's electronic award and management system, currently the Transit Award Management System (TrAMS). You must be registered in TrAMS to submit your Applicant's FY 2017 Certifications and Assurances. TrAMS contains fields for selecting among the twenty-three (23) Categories of Certifications and Assurances and a designated field for selecting all twenty-three (23) Categories of Certifications and Assurances. If FTA agrees that you are unable to submit your Applicant's FY 2017 Certifications and Assurances electronically, you must submit the Signature Pages at the end of this document, as FTA directs, marked to show the Categories of Certifications and Assurances that you are submitting.

Be aware that these Certifications and Assurances have been prepared in light of:

- The Fixing America's Surface Transportation (FAST) Act, Public Law No. 114-94, December 4, 2015, and other authorizing legislation to be enacted, and*
- Appropriations Acts or Continuing Resolutions funding the U.S. Department of Transportation during Fiscal Year 2017.*

FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES

**FEDERAL FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES FOR
FEDERAL TRANSIT ADMINISTRATION ASSISTANCE PROGRAMS**

(Signature pages alternative to providing Certifications and Assurances in TrAMS)

Name of Applicant: Cobb County

The Applicant agrees to comply with applicable provisions of (Categories 01 – 23. X
OR

The Applicant agrees to comply with applicable provisions of the Categories it has selected:

<u>Category</u>	<u>Description</u>	
01.	Required Certifications and Assurances for Each Applicant.	_____
02.	Lobbying.	_____
03.	Procurement and Procurement Systems.	_____
04.	Private Sector Protections.	_____
05.	Rolling Stock Reviews and Bus Testing.	_____
06.	Demand Responsive Service.	_____
07.	Intelligent Transportation Systems.	_____
08.	Interest and Financing Costs and Acquisition of Capital Assets by Lease.	_____
09.	Transit Asset Management Plan, Public Transportation Safety Program, and State Safety Oversight Requirements.	_____
10.	Alcohol and Controlled Substances Testing.	_____
11.	Fixed Guideway Capital Investment Grants Program (New Starts, Small Starts, and Core Capacity Improvement).	_____
12.	State of Good Repair Program.	_____
13.	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs.	_____
14.	Urbanized Area Formula Grants Programs and Passenger Ferry Grant Program.	_____
15.	Enhanced Mobility of Seniors and Individuals with Disabilities Programs.	_____
16.	Rural Areas and Appalachian Development Programs.	_____
17.	Tribal Transit Programs (Public Transportation on Indian Reservations Programs).	_____
18.	State Safety Oversight Grant Program.	_____
19.	Public Transportation Emergency Relief Program.	_____
20.	Expedited Project Delivery Pilot Program.	_____
21.	Infrastructure Finance Programs.	_____
22.	Paul S. Sarbanes Transit in Parks Program.	_____
23.	Construction Hiring Preferences.	_____

FTA FISCAL YEAR 2017 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2017 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE
(Required of all Applicants for federal assistance to be awarded by FTA and all FTA Grantees with an active Capital or Formula Award)

AFFIRMATION OF APPLICANT

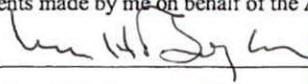
Name of the Applicant: Cobb County
Name and Relationship of the Authorized Representative: Michael H. Boyce, Chairman
Cobb County Board of Commissioners

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2017, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2017.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature  Date: 2/28/17

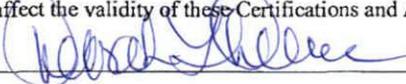
Name Michael H. Boyce, Chairman, Cobb County Board of Commissioners
Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Cobb County

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature  Date: 2/27/17

Name Deborah L. Dance, County Attorney
Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA and each FTA Recipient with an active Capital or Formula Project or Award must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within FTA's electronic award and management system, provided the Applicant has on file and uploaded to FTA's electronic award and management system this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.



Attachment B

Title VI Complaint Resources

ATTACHMENT B

Title VI Complaint Procedures

The following pertains only to Title VI complaints regarding the federally funded programs of the CobbLinc. Title VI, 42 U.S.C. §2000d et seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement that: No person in the United States shall, on the ground of race, color, sex, 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. CobbLinc has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter VII of the Federal Transit Administration Circular 4702. 1B, dated October 1, 2012. If you believe that CobbLinc's federally funded programs have violated your civil rights on the basis of race, color, sex, or national origin you may file a written complaint by following the procedure outlined below:

1. Submission of a Complaint. Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, sex, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by CobbLinc may file a written complaint with the Transit Operations Manager. A sample complaint form is available in hard copy from CobbLinc. Such complaints must be filed within 180 calendar days after the date the discrimination occurred. *Note: Upon request, assistance in the preparation of any necessary written material will be provided to a person or persons who are unable to read or write.*

Complaints should be mailed to:

CobbLinc

Attention: Transit Operations Manager

463 Commerce Park Drive, Suite 112

Marietta, GA 30060

e-mail: TitleVI@cobbcounty.org

2. Referral to Review Officer. Upon receipt of the complaint, CobbLinc Division Manager shall appoint one or more review officers, as appropriate, to evaluate and investigate the complaint, in consultation with other County Departments as needed. The Complainant shall meet with the staff review officer(s) to further explain his or her complaint. The staff review officer(s) shall complete their review no later than 45 calendar days after the date CobbLinc received the complaint. If more time is required, the Transit Division Manager shall notify the Complainant of the estimated timeframe for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the transit system's processes relative to Title VI, as appropriate. The review officer(s) shall forward their recommendations to the Transit Division Manager for concurrence. He or she shall issue the transit system's written response to the Complainant.

Note: Upon receipt of a complaint, CobbLinc shall forward a copy of this complaint and the resulting written response to the appropriate state and federal transit administration contacts.

3. Request for Reconsideration. If the Complainant disagrees with the Transit Division Manager's response, he or she may request reconsideration by submitting the request, in writing, to the Director of the Department of Transportation within 10 calendar days after receipt of the Transit Division Manager's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the CobbLinc Division Manager. The Complainant will be notified of a decision either to accept or reject the request for reconsideration within 10 calendar days.

4. Appeal. If the request for reconsideration is denied, the Complainant may appeal the Director's response by submitting a written appeal to the County Manager no later than 10 calendar days after receipt of the Director's written decision rejecting reconsideration.

5. Submission of Complaint to the Federal Transit Administration. The Complainant may also file a complaint with the FTA regardless of satisfaction of agency determination in writing within 180 days after the alleged date of discrimination. The Complaint must be signed and include contact information. Complaints should be sent to FTA at the address below:

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



Attachment B-1

Title VI Complaint Form

ATTACHMENT B-1

**Title VI Complaint Form
CobbLinc**

The purpose of this form is to assist you in filing a complaint with CobbLinc. You are not required to use this form; a letter containing the same information will be sufficient. It is important, however, to include all information related to items marked with an asterisk (*), whether or not the form is used.

1.* State your name and address

Name: _____
Address: _____
Telephone Number: Home: _____ Work: _____

2.* Person discriminated against if different from above:

Name: _____
Address: _____
Telephone Number: Home: _____ Work: _____

Please explain your relationship to this person(s):

3.* Agency or program that discriminated:

Name: _____
Any individual (if known): _____
Address: _____
Telephone Number: _____

4A.* Non-Employment: Does your complaint concern discrimination in the delivery of services or in other discriminatory actions of the transit system in its treatment of you or others? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken (e.g., "Race: African American" or "Sex: Female).

Race/Color: _____
National Origin: _____
Sex: _____
Religion: _____
Age: _____
Disability: _____

4B.* Employment: Does your complaint concern discrimination in employment by the transit system? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken (e.g., "Race: African American" or "National Origin: Canadian").

Race/Color: _____

National Origin: _____

5. What is the most convenient time and place for us to contact you about this complaint?

6. If we will not be able to reach you directly, you may wish to give us the name and phone number of a person who can tell us how to reach you and/or provide information about your complaint:

Name: _____

Telephone Number: _____

7. If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name of attorney: _____

Address of attorney: _____

Telephone number of attorney: _____

8.* To your best recollection, on what date(s) did the alleged discrimination take place?

Earliest date of discrimination: _____

Most recent date of discrimination: _____

9.* Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Please indicate who was involved. Be sure to include how other persons were treated differently from you. (Please use additional sheets if necessary and attach a copy of written materials pertaining to your case). _____

10. The laws we enforce prohibit recipients of federal funds programmed through the transit system from intimidating or retaliating against anyone because he or she has either taken action or participated in action to secure rights protected by these laws. If you believe that you have been retaliated against (separate from the discrimination alleged in #9), please explain the circumstances below. Be sure to explain what actions you took which you believe were the basis for the alleged retaliation. _____

16. If you have already filed a charge or complaint with an agency indicated in #15 above, please provide the following information (attach additional pages if necessary):

Agency: _____

Date Filed: _____

Case or Docket Number: _____

Date of Trial/Hearing: _____

Location of Agency/Court: _____

Name of Investigator: _____

Status of Case: _____

Comments: _____

17. How did you learn that you could file this complaint? _____

18.* We cannot accept a complaint if it has not been signed. Please sign and date this complaint form below.

(Signature)

(Date)

Please feel free to add additional sheets to explain the present situation to us. Please mail the completed, signed Discrimination Complaint Form (please make one copy for your records) to:

CobbLinc
Attn: Transit Operations Manager
463 Commerce Park Drive
Suite 112
Marietta, GA 30060
770-528-1610
e-mail: TitleVI@cobbcounty.org



Attachment C

List of Transit-Related Title VI Investigations

ATTACHMENT C:

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS

There were no active transit-related Title VI investigations, active lawsuits, or complaints alleging discrimination by CobbLinc, filed with FTA, or entities other than FTA since the previous CobbLinc Title VI Program submission in 2015. This attachment has been reserved for future documentation.

Transit-Related Investigations, Complaints, or Lawsuits

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				



Attachment D

Limited English Proficiency Plan

ATTACHMENT D

Limited English Proficiency (LEP) Plan

An assessment of Cobb County's Limited English Speaking Population was updated in October 2017. According to the latest census data, 2011-2015 American Community Survey (ACS), the percentage of population age 5 or over that speaks English less than very well in Cobb County is 7.8 percent, 0.5% down from the 2010 Census data. The corresponding number for the State of Georgia is 5.7 percent, no change from the 2010 Census. The majority of those who do speak English less than very well in Cobb County are Spanish.

Implementation Plan

CobbLinc has implemented the following plan to address the growing needs of our Limited English Proficient Persons in Cobb County:

- CobbLinc publishes all of its route schedules in Spanish.
- CobbLinc's contractor has had at least one bilingual customer service representative since June 9, 2003.
- CobbLinc has added one bilingual staff member in 2011.
- CobbLinc has notified the LEP population of the availability of these services through its web page.
- CobbLinc has made all internal staff including its management, customer service agents, and bus operators aware of the Spanish language schedules as well as the bilingual customer service agents.
- The CobbLinc customer service manager has the bilingual customer service agents record all calls from Spanish speaking passengers and also tracks how many Spanish schedules are requested.

Limited English Proficiency Plan

Introduction

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as CobbLinc and governments, private and non-profit entities, and sub-recipients.

Plan Summary

CobbLinc has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to CobbLinc services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the CobbLinc's extent of obligation to provide LEP services, CobbLinc undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the CobbLinc service area who maybe served or likely to encounter a CobbLinc program, activity, or service; 2) the frequency with which LEP individuals come in contact with CobbLinc services; 3) the nature and importance of the program, activity or service provided by CobbLinc to the LEP population; and 4) the resources available to CobbLinc and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Four Factor Analyses

1. The number or proportion of LEP persons eligible in the CobbLinc service area who may be served or likely to encounter a CobbLinc program, activity, or service.

CobbLinc examined the latest available census data (2011-2015 American Community Survey) and was able to determine that approximately 21.1%, or 141,263 people within CobbLinc's service area age 5 and older spoke a language other than English. Of the 141,263 people reporting they speak other languages than English, 52,220 or 7.8% of respondents either speak English "not well" or "not at all." Spanish comprised the largest non-English speaking language groups. (See Appendix A Languages Spoken at Home Chart).

2. The frequency with which LEP individuals come in contact with a CobbLinc program, activity, or service.

CobbLinc assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. Since January 2012, CobbLinc has had a high volume of request for Spanish speaking Customer Service Agents and minimum requests for translated CobbLinc documents. As a result, CobbLinc has made every effort to make Spanish speaking agents readily available, added additional Spanish speaking staff, and translated documents into Spanish.

3. The nature and importance of the program, activity, or service provided by CobbLinc to LEP community.

There is no large geographic concentration of any one type of LEP individuals in the CobbLinc service area. The overwhelming majority of the population, 78.9% or 529,795, speak only English. Therefore, there is a lack of any social, service, professional and leadership organizations within the CobbLinc service area that focuses on outreach or membership of LEP individuals. (See Appendix A Languages Spoken at Home Chart). However, CobbLinc recognizes that it serves a large proportion of Spanish speaking customers, where this language is there primary language spoken. As a result, CobbLinc has made every effort to make information and assistance accessible.

4. The resources available to CobbLinc and overall costs.

CobbLinc assessed its available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost on a needed basis, which documents would be the most valuable to be translated if and when the populations support, taking an inventory of available organizations that CobbLinc could partner with for outreach and translation efforts, and what level of staff training is needed. After analyzing the four factors, CobbLinc developed the plan in the following section for assisting persons of limited English proficiency.

A separate Environmental Analysis was performed to illustrate how current CobbLinc routes cover the areas with a different concentration of LEP populations as found in the 2011-2015 American Community Survey. (See Appendix C)

How to Identify an LEP Person who Needs Language Assistance.

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When CobbLinc sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the CobbLinc Customer Service Area; and
- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.

Language Assistance Measures

CobbLinc has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the CobbLinc service area:

- Census Bureau's "I Speak Cards" are to be located at the Customer Service window in the Transit Center at all times.
- When an interpreter is needed, in person or on the telephone, and the CobbLinc staff has exhausted the above options, staff will first attempt to determine what language is required. Staff

shall use the telephone interpreter service – Language Line Services at <http://www.language.com>. On the Language Line home page the staff will select the Need an Interpreter Now link and follow the directions to receive and access code.

CobbLinc Staff Training

All CobbLinc staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the CobbLinc staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services CobbLinc offers;
- Use of LEP “I Speak Cards”;
- How to use the Language Line interpretation and translation services;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint (See Attachment B)

Outreach Techniques

CobbLinc does not have a formal practice of outreach techniques due to the lack of resources available in the service area. However, the following are a few options that CobbLinc will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert language) will be available”. For example: “Un traductor del idioma español estará disponible” This means “A Spanish translator will be available”.
- Key print materials, including but not limited to schedules and maps, will be translated and made available at the CobbLinc Transit Center, on board vehicles, and in communities when a specific and concentrated LEP population is identified.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, CobbLinc will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the CobbLinc service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified CobbLinc programs? Are there other programs that should be included?
- Have CobbLinc's available resources, such as technology, staff, and financial costs changed?
- Has CobbLinc fulfilled the goals of the LEP Plan?
- Were any complaints received?

Dissemination of the CobbLinc Limited English Proficiency Plan

CobbLinc includes a link to the LEP plan on the CobbLinc website (CobbLinc.org) together with its Title VI Policy Statement and Complaint Procedures. CobbLinc's Notice of Rights under Title VI to the public posted in the CobbLinc Customer Service Center, on all CobbLinc vehicles, meeting rooms, meeting notices and in selected printed materials also refers to the LEP Plan's availability.

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the CobbLinc Transit Operations Manager.

CobbLinc
ATTN: Transit Operations Manager
463 Commerce Park Drive
Suite 112
Marietta, GA 30060
Phone: 770-528-1610
Email: TitleVI@cobbcounty.org



Attachment E

Notice to the Public

Title VI Notice to the Public

The text identified below will be placed permanently on the CobbLinc's website (CobbLinc.org). This notice is also disseminated via public notices and postings at CobbLinc's transfer stations, park and ride lots, and in administrative and maintenance facilities.

CobbLinc hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statues and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which CobbLinc receives Federal financial assistance.

To request a copy of the Title VI program or to request copies of the program in an alternative format in accordance with ADA and LEP regulations contact CobbLinc at 770-528-1610.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any CobbLinc service, program or activity, and believes the discrimination is based upon race, color, national origin, gender, age, economic status or limited English proficiency has the right to file a formal complaint.

Complaints must be in writing and filed with CobbLinc's Title VI Coordinator within one hundred and eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discriminatory Complaint Form, please contact:

CobbLinc
Attention: Transit Operations Manager
463 Commerce Park Drive, Suite 112
Marietta, GA 30060
E-Mail: TitleVI@cobbcounty.org

Complaints may also be filed with the Federal Transit Administration in writing within 180 days after the alleged date of discrimination. The Complaint must be signed and include contact information. Complaints should be sent to FTA at the address below:

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

Aviso al Público

El texto identificado abajo esta puesto permanentemente en la pagina Web del sistema de tránsito (CobbLinc.org) y fijado en el centro de transferencia de Marietta y el centro de transferencia de Cumberland. Este aviso también se disemina vía quioscos de servicio al cliente, en los vehículos, en lugares de reunión pública y se envía en avisos de reuniones.

CobbLinc da por este medio el aviso público que no discrimina a base de raza, color, u origen nacional en la disposición de los servicios de transporte y es la política de la agencia asegurar conformidad completa con el Título VI del Acto de Derechos Civiles de 1964, el Acto de la Restauración de los Derechos Civiles de 1987, la Orden Ejecutiva 12898 de Justicia Ambiental, y los estatutos relacionados y las regulaciones relacionadas en todos los programas y actividades del servicio de tránsito . El Título VI requiere que ninguna persona en los Estados Unidos de América, a base de raza, color, u origen nacional, sea excluida de la participación en, se niegue las ventajas de, o se sujete de otra manera a la discriminación bajo cualquier programa o actividad para los cuales el CobbLinc recibe ayuda financiera federal.

Para solicitar una copia del programa de Título VI o solicitar copias del programa en un formato alternativo de acuerdo con las regulaciones de la ley de Protección de Personas Discapacitadas de los Estados Unidos (*Americans with Disabilities Act, ADA*) y las regulaciones para personas con una Suficiencia Limitada en Idioma Inglés (*Limited English Proficiency, LEP*) comuníquese con el CobbLinc al número 770-528-1610.

Cualquier persona que crea que ha sido agraviada por una práctica discriminatoria ilegal bajo el Título VI tiene el derecho de presentar una queja oficial con el CobbLinc.

La queja debe ser por escrito y enviada al Gerente de Operaciones de Transito de CobbLinc, dentro del plazo de cientos y ochenta (180) días posterior a la fecha de la presunta práctica u ocurrencia discriminatoria alegada. Para más información, u obtener una forma Discriminatoria de Queja de Título VI, por favor comuníquese con:

CobbLinc

Attention: Transit Operations Manager

463 Commerce Park Drive, Suite 112

Marietta, GA 30060

E-mail: TitleVI@cobbcounty.org

La queja se puede también enviar a la agencia de Administración Federal de Transporte (*Federal Transportation Administration, FTA*) por escrito, dentro del plazo de 180 días posterior a la fecha del presunto acto de discriminación. La queja debe ser firmada e incluir la información de contacto. La queja se debe enviar a FTA a la siguiente dirección:

Federal Transit Administration Office of Civil Rights

Attention: Title VI Program Coordinator

East Building, 5th Floor-TCR

1200 New Jersey Ave., SE

Washington, DC 20590



Attachment F

Description of Service Changes and Their Effects on
Minority and Low Income Population

ATTACHMENT F

DESCRIPTION OF SERVICE CHANGES AND THEIR EFFECTS ON MINORITY AND LOW INCOME POPULATION

CobbLinc's Title VI policy is to evaluate all service changes/enhancements to determine the impact on minority communities. The following represents the results of the evaluation of the service modifications on the minority community.

A. Service Changes/Enhancements

Since the last submission of the Title VI program in 2015, two new routes (Route 25 and the Cumberland District Circulator) have been added and implemented in the CobbLinc transit system. CobbLinc is currently in the process of making changes to current circulator routes. An additional route (Route 10X) is planned for implementation in the near future. The County is also considering enhancements to weekend transit services.

Route 25

Route 25 service was implemented in September 2016. The route operates from the Cumberland Transfer Center to the HE Holmes MARTA Station via Hurt Road and Old Alabama Road. The route runs Monday through Saturday with one-hour frequencies. The scheduled trip time is one-hour and twenty minutes. Destinations along the route include Six Flags Over Georgia at Six Flags Parkway and Wellstar Cobb Hospital along Austell Road. The impact of this new implementation has been studied as part of the South Cobb Transit Evaluation and Implementation Plan, and was included in the previous Title VI submittal in 2015. In summary, the analysis of the minority population information revealed that the service changes are not discriminatory to the minority community.

Cumberland District Circulator

Implemented in March 2017, the Cumberland District Circulator is a local fixed-route bus service around the Cumberland district, running Monday through Saturday. The route provides service from the Cumberland Transfer Center to the Atlanta Marriott Northwest at Galleria hotel along Cumberland Connector, Cobb Parkway, Akers Mill Road, Interstate North Parkway, Windy Ridge Parkway SE, through The Battery Atlanta, and Circle 75 Parkway. Destinations along the route include Cumberland Mall, Cobb Galleria, Cobb Energy Center, Interstate North Office Park, the SunTrust Park, and The Battery Atlanta. The service equity analysis for this service expansion indicates that the implementation would not result in a disparate impact or in a disproportionate burden. *Detailed analysis is attached at the end of Attachment F.*

Changes to Circulator System

CobbLinc is currently proposing changes to its Circulator System routes. Blue and Green Circulator System routes will be adjusted to intersect with CobbLinc's bus routes, and Red Circulator System will be discontinued. A separate service equity analysis for this service change has been conducted. The analysis results indicate that the service change would not result in a

disparate impact or in a disproportionate burden. *Detailed analysis is attached at the end of Attachment F.*

Route 10X

As currently proposed, Route 10X is an express bus service from MARTA Midtown Station to Town Center, running Monday through Friday. Along the route, stops will only be made at MARTA Arts Center Station, Cumberland Transfer Center, Windy Hill Road/US 41, KSU-Marietta/Life University, and Marietta Transfer Center. The route would have potential for Transit Signal Priority (TSP) and queue jump potential from Cumberland Boulevard to South Marietta Parkway SE/SR 120. The segment of the route from South Marietta Parkway SE to Barrett Parkway will utilize the future I-75 Northwest Corridor Express Lanes, providing faster service between Town Center and Marietta Transfer Center. Route 10X may supplement both Route 10 and the routes that service Town Center. The service is proposed to begin service in Winter 2019.

A separate Title VI analysis for Route 10X has been conducted. Given the higher levels of minority and low-income representation among transit riders during the survey than the general population, the survey analysis confirms that the current Route 10X does not exclude minority or low-income individuals from using Cobb transit service. *The complete report is attached at the end of Attachment F.*

Weekend Bus Services

Cobb County Department of Transportation (DOT) is exploring options for improving weekend transit service. CobbLinc currently provides service Monday through Saturday on CobbLinc local and express bus, Lift complementary paratransit, and Flex on-demand service. The County is considering options for improving Saturday service and for future implementation of Sunday local bus and paratransit service. A separate Title VI analysis for weekend bus services indicates that the service change recommendations do not have a disproportionate impact on low-income and minority communities in Cobb County.

Potential impacts to low-income and minority populations are an important consideration as Cobb DOT and CobbLinc explore weekend bus service changes. Because CobbLinc receives federal funding for its bus service, the FTA requires completing a Title VI evaluation of impact on low-income and minority populations for any significant service change. The study team identified the demographic characteristics of each route to prepare for the Title VI evaluation. As defined by the US Census Bureau, a minority person is a person who identifies as non-white or Hispanic/Latino. The low-income threshold is based on an individual or household income that is at or below the poverty threshold identified by the US Census Bureau. The results of this analysis were completed for the Existing Conditions memo and produced the listing of whether an existing bus route services census tracts with higher percentages of minority and low-income people than the average of the county population. The analysis showed that all routes currently operating on Saturday are considered low-income routes. It also showed that Route 10, Route 15, Route 20, and Route 30 are considered minority routes. The analysis was expanded upon using

the proposed change in total service miles to each of the routes that are described later in this document.

A threshold is established in the Cobb DOT Title VI Plan (2015) to ensure that there is less than a 25-percentage point difference between service on low-income/non-low-income and minority/non-minority bus routes. This 25-percentage point threshold is established in the Cobb DOT Title VI Plan (2015).

Comparing the existing total service miles to the proposed total service miles, service to minority and low-income communities is increased. Because all the routes are considered low-income routes, this metric was no longer considered in this analysis. As shown in the table below, the number of service miles to minority routes increases from 2,708.1 miles to 3,012.3 miles, from 70.7% to 76.0% of the total service miles in the system. The number of service hours to minority routes increases from 173.8 hours to 188.9 hours, from 68.9% to 74.7% of the total service hours in the system. As a result, the service change recommendations do not have a disproportionate impact on low-income and minority communities in Cobb County. Please note that Route 10X, Route 25, and the Cumberland Circulator are not included in the Title VI Analysis.

Demographic	Existing Service		Proposed Service	
	Total Service Miles	Total Service Hours	Total Service Miles	Total Service Hours
Minority Routes	2,708.1	173.8	3,012.3	188.9
Non-Minority Routes	1,120.0	78.5	950.7	63.8
<i>Percent Minority</i>	<i>70.7%</i>	<i>68.9%</i>	<i>76.0%</i>	<i>74.7%</i>

B. Fare Changes

Since the last submission of the Title VI program in 2015, there were no fare changes for CobbLinc riders. CobbLinc will ensure that all regulations and requirements as outlined in FTA Circular 4702.1B will be conducted and documented accordingly.

Conclusions

The preceding analyses of the minority population information revealed that the proposed service enhancements and changes are not discriminatory to the minority community.

**Title VI Service Equity Analysis
Related to a Service Expansion Proposal
Cumberland Circulator
September 2015**

I. INTRODUCTION

The Cumberland Community Improvement District (CID) initiated a Cumberland Connectivity Study in 2006 to develop an innovative, multimodal plan and program for a circulator system in the CID. This study was preceded by the Cumberland Shuttle Operations and Implementation Plan, conducted in 2002, which identified five potential shuttle routes for the CID. As a follow-up to the 2006 study, Cobb County Department of Transportation (DOT) has requested an updated circulator implementation plan.

The Cumberland area, which surrounds the interchange of I-75 and I-285, is identified as a major regional activity center by the Atlanta Regional Commission (ARC). Significant residential, commercial, and retail development continues to occur in the Cumberland area, and Cobb DOT is interested in implementing mobility improvements for the district. Also, the new Atlanta Braves baseball stadium, SunTrust Park, is located in the northwestern quadrant of the Cumberland area gives additional motivation to improve circulation and transit access in the area.

Circulator systems are gaining popularity around the country as a service type that can accommodate both common and unique transit markets. These services can improve mobility for area visitors, employees, and residents while contributing to economic development. A circulator service for the Cumberland area as described through this implementation plan can serve a number of purposes, such as:

- Improve connectivity within the Cumberland community
- Provide a unique mobility option and visual image enhancement to the area
- Offer direct and reliable service between local attractions, offices, residences, shopping districts, historic sites, and transportation facilities
- Encourage greater use of pedestrian facilities and public transit for residents, commuters, and visitors

Additionally, consideration was given to common elements associated with previously implemented successful circulator or circulator type services. The elements include:

- Links to many destinations and activities
- Provides service on a regular and frequent basis
- Route design is relatively direct and within activity areas
- Service is easy to understand, use, and access
- Facilitates convenient connections with other area transit services

AECOM, in coordination with the Cobb County DOT and CobbLinc developed a phased implementation plan for advancing sustainable transit options that provide mobility options for residents, employees, and visitors of the Cumberland area. Specifically, the consultant evaluated existing transit service within the Cumberland area, developed recommendations for circulator service, and prepared an implementation plan for consideration by the Board. The recommendations include three circulator routes covering the Core, South, and North travel directions. Service expansion identified during the study will be implemented primarily with funding from a hotel/motel occupancy tax within the Cumberland area, and will not take away funds from existing or proposed service in other parts of Cobb County.

The project team is cognizant of Title VI of the Civil Rights Act of 1964, Section 601 that states:

No persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The team's responsibility is to guarantee that all transit service, and access to its facilities, are equitably distributed and provided without regard to race, color, or national origin. CobbLinc's goal is to also ensure equal opportunities to all individuals to participate in all local, sub regional and regional transit planning and decision-making processes.

The Federal Transit Administration (FTA) issued Circular 4702.1B in 2012, which defines Title VI and Environmental Justice procedures applying to all providers of fixed route public transportation (also referred to as transit providers) that receive Federal financial assistance. Among the Title VI requirements is the requirement to evaluate service and fare changes. Per Appendix K of Circular 4702.1B:

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV, must conduct a Title VI equity analysis whenever they plan a fare change and/or a major service change. Equity analyses are required regardless of whether proposed changes would cause positive or negative impacts to riders. In other words, transit providers must conduct an equity analysis for all fare changes and for major service reductions and major service expansions. Financial exigencies and other special circumstances (e.g., economic hardships, size of transit provider's service area or staff) do not exempt transit providers from the requirement to conduct equity analyses.

The purpose of this evaluation is to determine if proposed changes adversely impact minority populations in a disparate manner compared to non-minority populations and low-income populations in a disproportionate manner compared to non-low-income populations. Per Chapter I of FTA Circular 4702.B:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there

exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

II. POLICY

CobbLinc has established policies for service equity analyses as required by Chapter IV of Circular 4702.1B. CobbLinc defines a Major Service Change as:

1. Decreasing or enhancing service by 10% or more of total service provided (revenue hours)
2. Deletion of service to a major employment destination or service area

CobbLinc has established a threshold for determining when adverse impacts of service or fare changes are borne disproportionately by minority populations. The threshold has been established at 10% based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

This same threshold of 10% is also used when determining if adverse impacts of service or fare changes are borne disproportionately by low-income populations. The threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. In other words, minority population is defined as non-white persons, or those of Hispanic origin.

The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty thresholds are based on household size and income, and are nearly identical to the guidelines used to define poverty in the 2010 U.S. Census and American Community Survey (ACS).

III. EVALUATION METHODOLOGY

Impacts of the proposed service expansions to the Cumberland Study Area were determined by applying CobbLinc's policies using ACS data (2009 – 2013 5-year estimate) for those living within walking distance (defined as living within ¼ mile radius) of a route. The proposed service changes were evaluated cumulatively, rather than separately for each route change, as provided for in Chapter IV of Circular 4702.1B.

IV. DISPARATE IMPACT ANALYSIS

The table below summarizes the total, minority and non-minority population (absolute numbers and percentages) for the existing CobbLinc local route system compared to the new services within the Cumberland Study Area.

	Within 1/4 Mile of Fixed Route Transit				
	Total Population Measured	Minority Population	Non-Minority Population	Percent Minority	Percent Non-Minority
Existing System	282,030	34,810	147,220	47.8%	52.2%
New/Modified Services					
Core Circulator	17,483	9,029	8,454	51.6%	48.4%
South Circulator	14,624	6,249	8,375	42.7%	57.3%
North Circulator	24,430	11,370	13,060	46.5%	53.5%
All Routes*	31,618	14,620	16,998	46.2%	53.8%
Difference from Existing System				-1.6%	1.6%

Looking at the existing local route system, 47.8% of those living within walking distance of the routes are minority and 52.2% are non-minority. Looking at the new services within the Cumberland Study Area cumulatively, 46.2% of those living within walking distance of the routes are minority and 53.8% are non-minority. The percent difference between the existing local route system and the new/modified services within the Cumberland Study Area is well within the 10% threshold for disparate impacts. Therefore, the implementation of the service changes would not result in a disparate impact.

V. DISPROPORTIONATE BURDEN ANALYSIS

The table below summarizes the total, low-income and non-low-income population (absolute numbers and percentages) for the existing CobbLinc local route system compared to the new services within the Cumberland Study Area.

	Within 1/4 Mile of Fixed Route Transit				
	Total Population Measured ¹	Low Income Population	Non-Low Income Population	Percent Low Income	Percent Non-Low Income
Existing System	273,737	53,215	220,522	19.4%	80.6%
New/Modified Services					
Core Circulator	17,458	2,720	14,738	15.6%	84.4%
South Circulator	14,624	1,283	13,341	8.8%	91.2%
North Circulator	24,405	3,243	21,162	13.3%	86.7%
All Routes*	31,593	3,817	27,776	12.1%	87.9%
Difference from Existing System				-7.4%	7.4%

¹ Population measured does not reflect entire population, but those for whom the Census Bureau can determine poverty status. It excludes people living in college dormitories and institutional group quarters (i.e. nursing homes, prisons), as well as unrelated individuals under age 15.

Looking at the existing local route system, 19.4% of the households within walking distance of the routes are low-income and 80.6% are non-low-income. Looking at the new services within the Cumberland Study Area cumulatively, 12.1% of households within walking distance of the routes are low-income and 87.9% are non-low-income. The percent difference between the existing local route system and the new/modified services within the South Cobb Study Area is within the 10% threshold for disproportionate burdens. Therefore, the implementation of the service changes would not result in a disproportionate burden.

Title VI Service Equity Analysis Related to Proposed Service Changes on CobbLinc Circulator System November 2017

I. INTRODUCTION

Circulator systems are gaining popularity around the country as a service type that can accommodate both common and unique transit markets. These services can improve mobility for area visitors, employees, and residents while contributing to economic development. CobbLinc currently operates Blue, Green, and Red Circulator Systems as shown in **Figure 1**. CobbLinc is proposing changes to its current Circulator System routes. Blue and Green Circulator System routes will be adjusted to intersect with CobbLinc's bus routes, and Red Circulator System will be discontinued. **Figure 2** illustrates proposed Circulator System routes after service changes. CobbLinc is also considering operating these proposed Circulator System routes free of charge using the revenue from the state Hotel-Motel Taxes imposed to the hotels/motels located in the surrounding areas.

The project team is cognizant of Title VI of the Civil Rights Act of 1964, Section 601 that states:

No persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The team's responsibility is to guarantee that all transit service, and access to its facilities, are equitably distributed and provided without regard to race, color, or national origin. CobbLinc's goal is to also ensure equal opportunities to all individuals to participate in all local, sub regional and regional transit planning and decision-making processes.

The Federal Transit Administration (FTA) issued Circular 4702.1B in 2012, which defines Title VI and Environmental Justice procedures applying to all providers of fixed route public transportation (also referred to as transit providers) that receive Federal financial assistance. Among the Title VI requirements is the requirement to evaluate service and fare changes. Per Appendix K of Circular 4702.1B:

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV, must conduct a Title VI equity analysis whenever they plan a fare change and/or a major service change. Equity analyses are required regardless of whether proposed changes would cause positive or negative impacts to riders. In other words, transit providers must conduct an equity analysis for all fare changes and for major service reductions and major service expansions. Financial exigencies and other special circumstances (e.g., economic hardships, size of transit provider's service area or staff) do not exempt transit providers from the requirement to conduct equity analyses.

Figure 1: Current CobbLinc Circulator System Routes

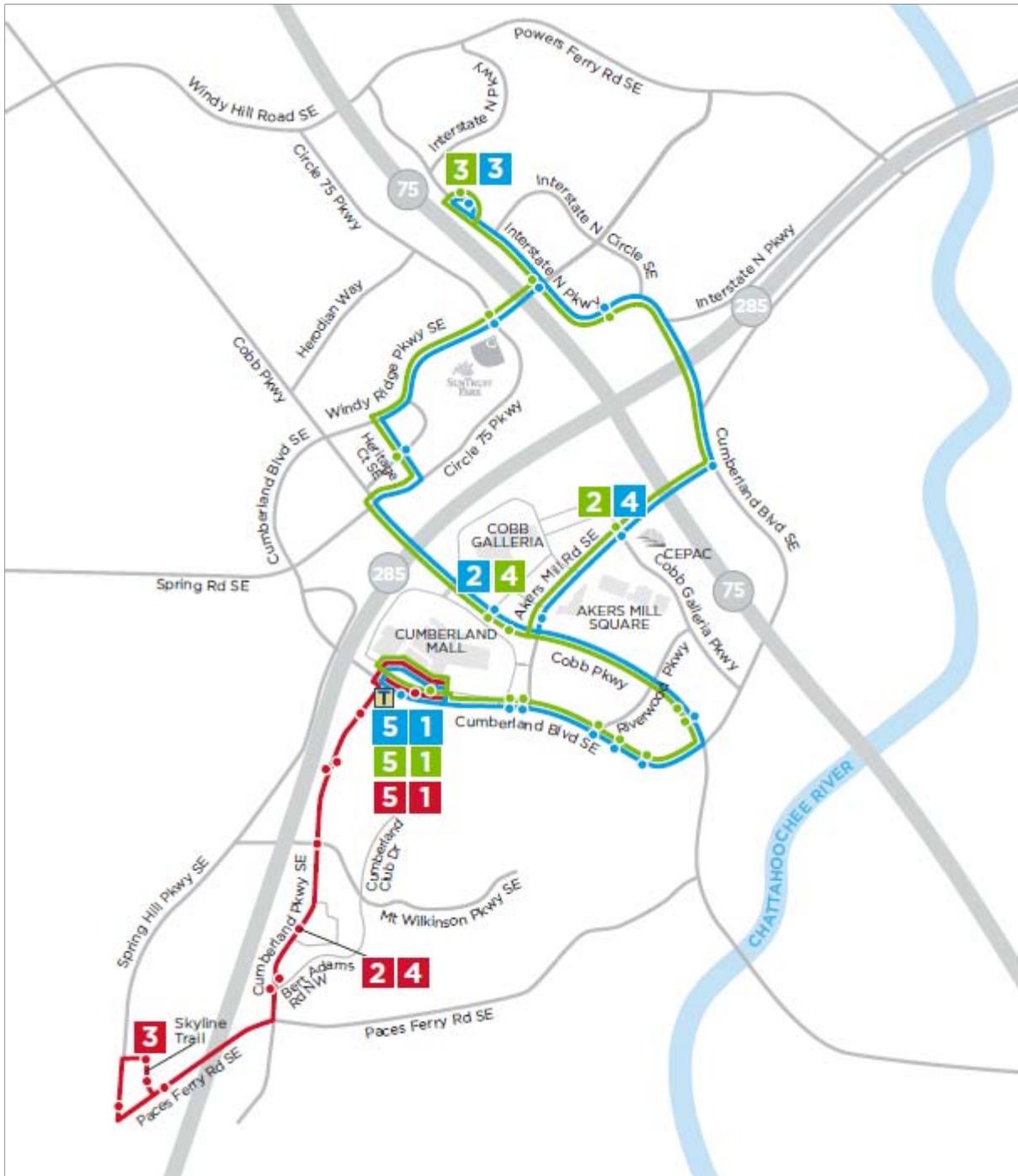
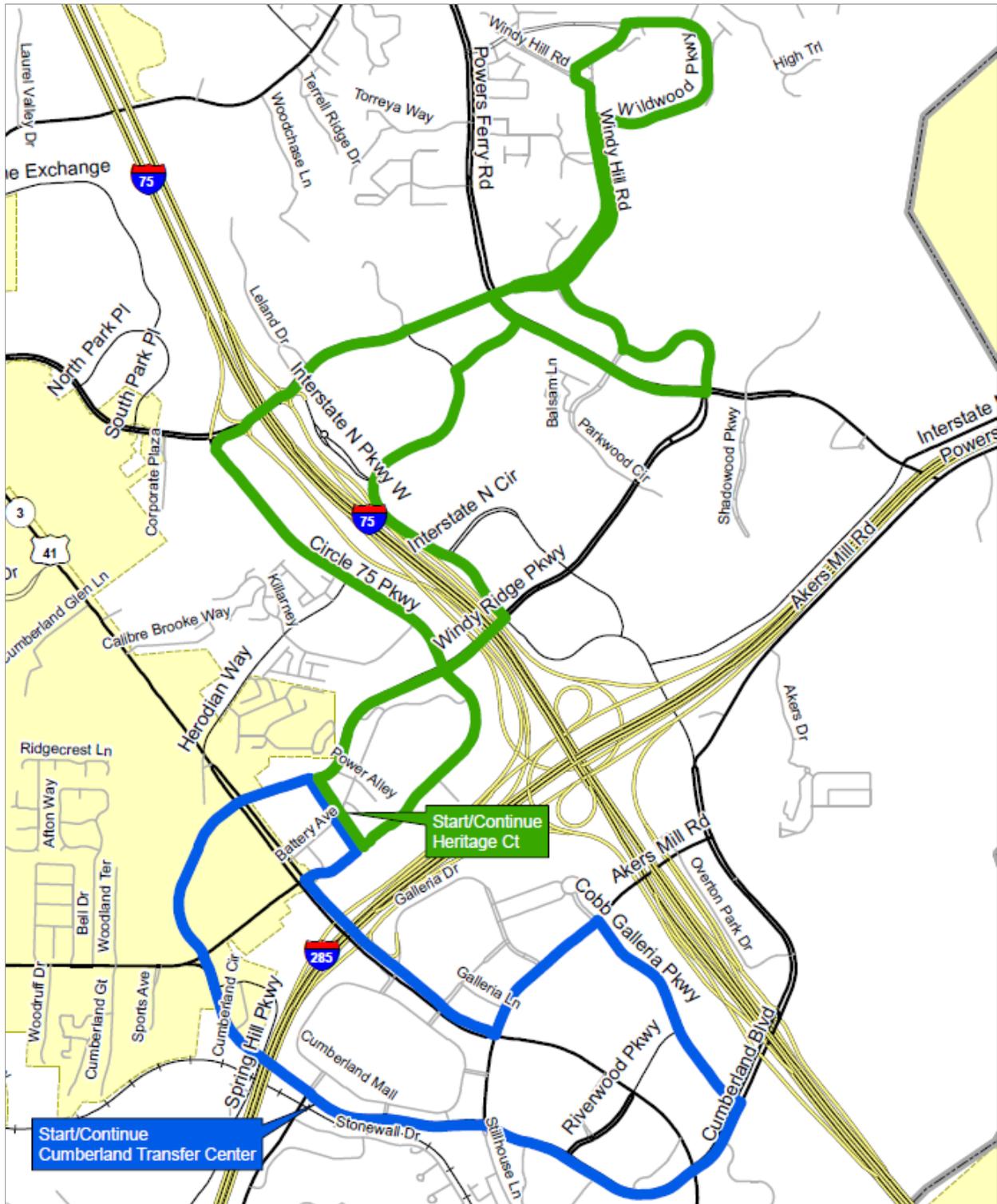


Figure 2: Proposed CobbLinc Circulator System Routes



The purpose of this evaluation is to determine if proposed changes adversely impact minority populations in a disparate manner compared to non-minority populations and low-income populations in a disproportionate manner compared to non-low-income populations. Per Chapter I of FTA Circular 4702.B:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

II. POLICY

CobbLinc has established policies for service equity analyses as required by Chapter IV of Circular 4702.1B. CobbLinc defines a Major Service Change as:

1. Decreasing or enhancing service by 10% or more of total service provided (revenue hours)
2. Deletion of service to a major employment destination or service area

CobbLinc has established a threshold for determining when adverse impacts of service or fare changes are borne disproportionately by minority populations. The threshold has been established at 10% based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

This same threshold of 10% is also used when determining if adverse impacts of service or fare changes are borne disproportionately by low-income populations. The threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. In other words, minority population is defined as non-white persons, or those of Hispanic origin.

The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty thresholds are based on household size and income, and are nearly identical to the guidelines used to define poverty in the 2010 U.S. Census and American Community Survey (ACS).

III. EVALUATION METHODOLOGY

Impacts of the proposed service changes to the analysis area were determined by applying CobbLinc's policies using latest ACS data (2011 – 2015 5-year estimate) for those living within reasonable walking distance (defined as living within ½ mile radius) of a route. The proposed service changes were evaluated

cumulatively, rather than separately for each route change, as provided for in Chapter IV of Circular 4702.1B.

IV. DISPARATE IMPACT ANALYSIS

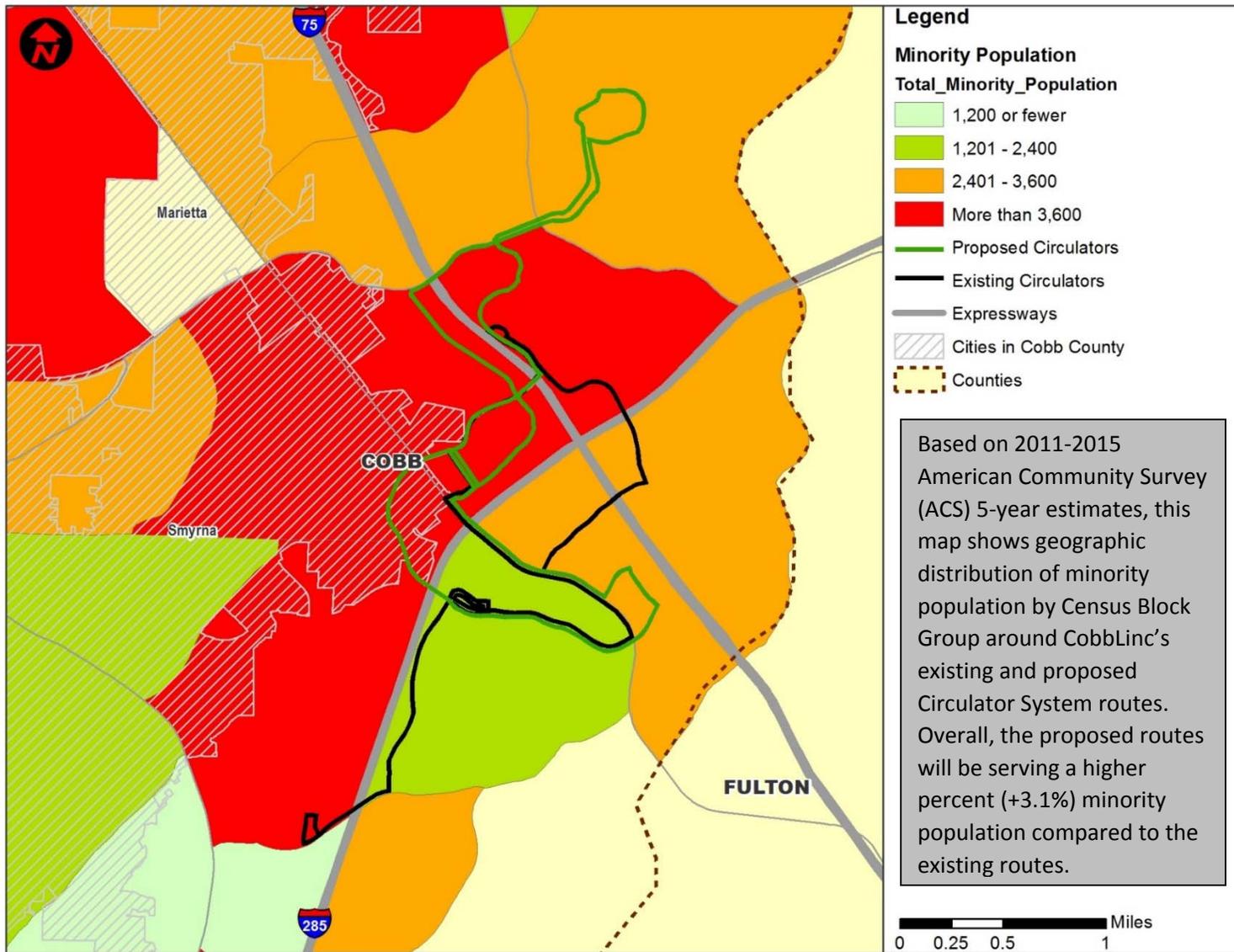
Table 1 summarizes the total, minority and non-minority population (absolute numbers and percentages) for the existing CobbLinc local route system compared to the new services within the analysis area.

Table 1: Disparate Impact Analysis Results

	Within 1/2 Mile of Fixed Route Transit				
	Total Population Measured	Minority Population	Non-Minority Population	Percent Minority	Percent Non-Minority
Existing Routes	24,670	11,867	8,951	48.1%	51.9%
Proposed Routes	19,864	10,167	6,324	51.2%	48.8%
Difference from Existing System				3.1%	-3.1%

Looking at the existing local route system, 48.1% of those living within walking distance of the routes are minority and 51.9% are non-minority. Looking at the new services within the analysis area cumulatively, 51.2% of those living within walking distance of the routes are minority and 48.8% area non-minority. The analysis indicates that, in fact, the proposed service changes will have a positive impact by serving a higher percentage of minority population (3.1%) compared to the existing routes. Higher percentage of minor population will be positively impacted by the proposed free fare operation of the Circulator Systems. **Figure 3** shows geographical distribution of minority population along existing and proposed Circulator System routes. In summary, the implementation of the service changes would not result in a disparate impact.

Figure 3: Distribution of Minority Population along Existing and Proposed Circulator System Routes



Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

V. DISPROPORTIONATE BURDEN ANALYSIS

Table 2 summarizes the total, low-income and non-low-income population (absolute numbers and percentages) for the existing CobbLinc local route system compared to the new services within the Circulator System service area.

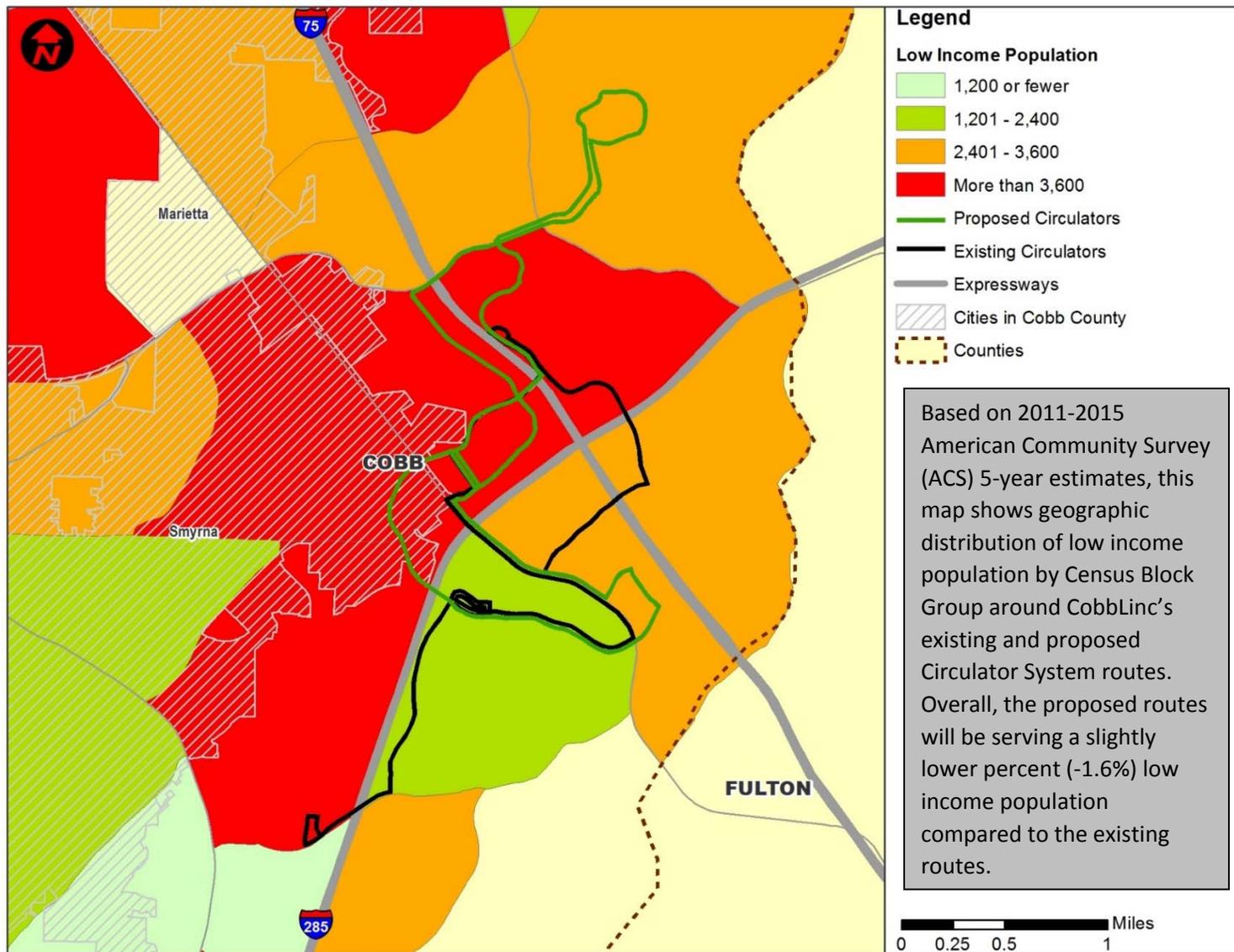
Table 2: Disproportionate Burden Analysis Results

	Within 1/2 Mile of Fixed Route Transit				
	Total Population Measured ¹	Low Income Population	Non-Low Income Population	Percent Low Income	Percent Non-Low Income
Existing Routes	24,670	3,816	20,854	15.5%	84.5%
Proposed Routes	19,864	2,758	17,106	13.9%	86.1%
Difference from Existing System				-1.6%	1.6%

Looking at the existing local route system, 15.5% of the households within walking distance of the routes are low-income and 84.5% are non-low-income. Looking at the new services within the analysis area cumulatively, 13.9% of households within walking distance of the routes are low-income and 86.1% are non-low-income. A slightly lower percentage (-1.6%) of low income population is expected to be served with the proposed routes while the percent difference between the existing and the new/modified services is well within the 10% threshold for disproportionate burdens. The proposed free fare operation of the Circulator Systems will have a positive impact on low income population being served. **Figure 4** illustrates geographical distribution of low income population along existing and proposed Circulator System routes. In conclusion, the implementation of the service changes would not result in a disproportionate burden.

¹ Population measured does not reflect entire population, but those for whom the Census Bureau can determine poverty status. It excludes people living in college dormitories and institutional group quarters (i.e. nursing homes, prisons), as well as unrelated individuals under age 15.

Figure 4: Distribution of Low Income Population along Existing and Proposed Circulator System Routes



Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates



Route 10X Preferred Alternative Title VI Analysis

INTRODUCTION

A Title VI analysis was performed on the preferred alternative Route 10X alignment to ensure it is in compliance with the requirements of Title VI of The Civil Rights Act of 1987. Title VI requires that no person shall on the basis of race, color, and national origin be excluded from participation in programs and activities receiving federal financial assistance.

Part 1 of this document summarizes the demographic analysis done at the county and service area level for minority populations, low-income populations, and limited English proficiency (LEP) persons. Part 2 summarizes the results of a select number of questions from the on-board survey conducted on Cobb County buses in May 2015. The results of these two parts were used to determine if the preferred route will adequately serve minority, low-income, and LEP populations. The Cobb County Transit Title VI Program Update and Title VI Circulator 4702.1B were used as references to ensure our methods were consistent with the requirements.

DEMOGRAPHIC ANALYSIS

The 2009-2013 American Community Survey (ACS) five-year estimates were used to analyze the impact the preferred route would have on minority populations, low-income populations, and LEP persons. Because the route serves parts of Fulton County in addition to Cobb County, analysis results for both counties were included.

Minority Populations

According to the 2009-2013 ACS five-year estimates, the total population of Cobb County is 699,235. Approximately 56 percent of the population is Caucasian, 25 percent is African-American, 12 percent Hispanic, and the remaining seven percent represents other minority groups. See **Table 1** and **Figure 1** on the next page.

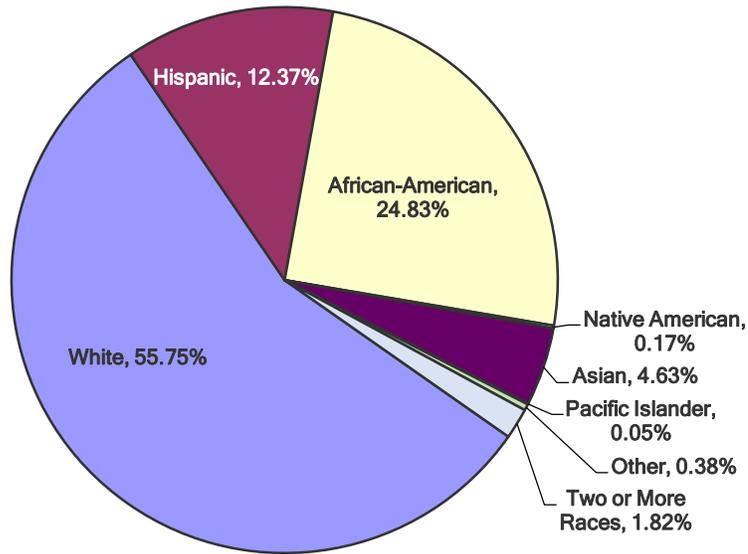


Table 1: Cobb County Racial Distribution

Race	Population	Percent of Total Population
White	389,809	55.75%
Hispanic	86,525	12.37%
African-American	173,597	24.83%
Native American	1,180	0.17%
Asian	32,402	4.63%
Pacific Islander	367	0.05%
Other	2,637	0.38%
Two or More Races	12,718	1.82%
Total Minority	309,426	44.25%
Total Population	699,235	100.00%

Source: 2009-2013 American Community Survey Five-Year Estimates

Figure 1: Cobb County Racial Distribution



The total population of Fulton County is 948,554. Approximately 41 percent of the population is Caucasian, 43 percent is African-American, eight percent Hispanic, and the remaining eight percent represents other minority groups. See **Table 2** and **Figure 2** on the following page.

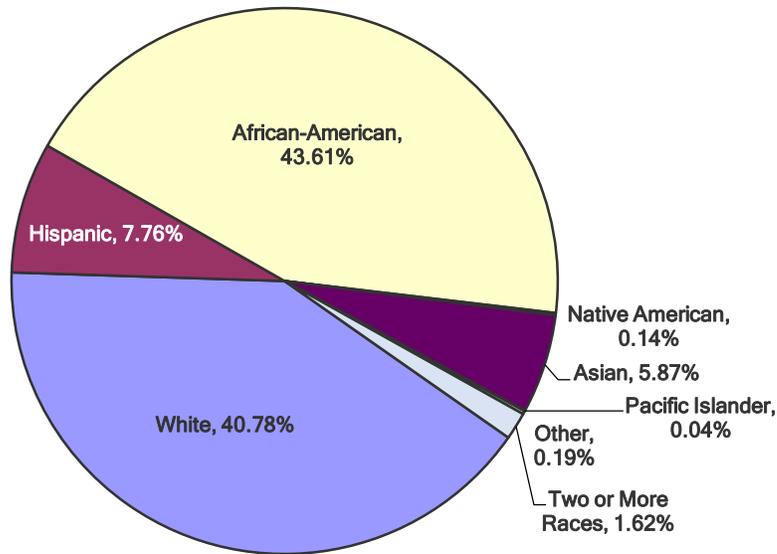


Table 2: Fulton County Racial Distribution

Race	Population	Percent of Total Population
White	386,845	40.78%
Hispanic	73,564	7.76%
African-American	413,677	43.61%
Native American	1,326	0.14%
Asian	55,644	5.87%
Pacific Islander	353	0.04%
Other	1,818	0.19%
Two or More Races	15,327	1.62%
Total Minority	561,709	59.22%
Total Population	948,554	100.00%

Source: 2009-2013 American Community Survey Five-Year Estimates

Figure 2: Fulton County Racial Distribution



Further analysis was performed at the stop level to determine what percentage of the ¼-mile service area around each stop is in a minority block group. A block group is identified as a minority block group when the percentage of minority people living in that block group exceeds the total percentage of the minority population for Cobb County (44.25%) or for Fulton County (59.22%). **Table 3** shows the breakdown on the following page.

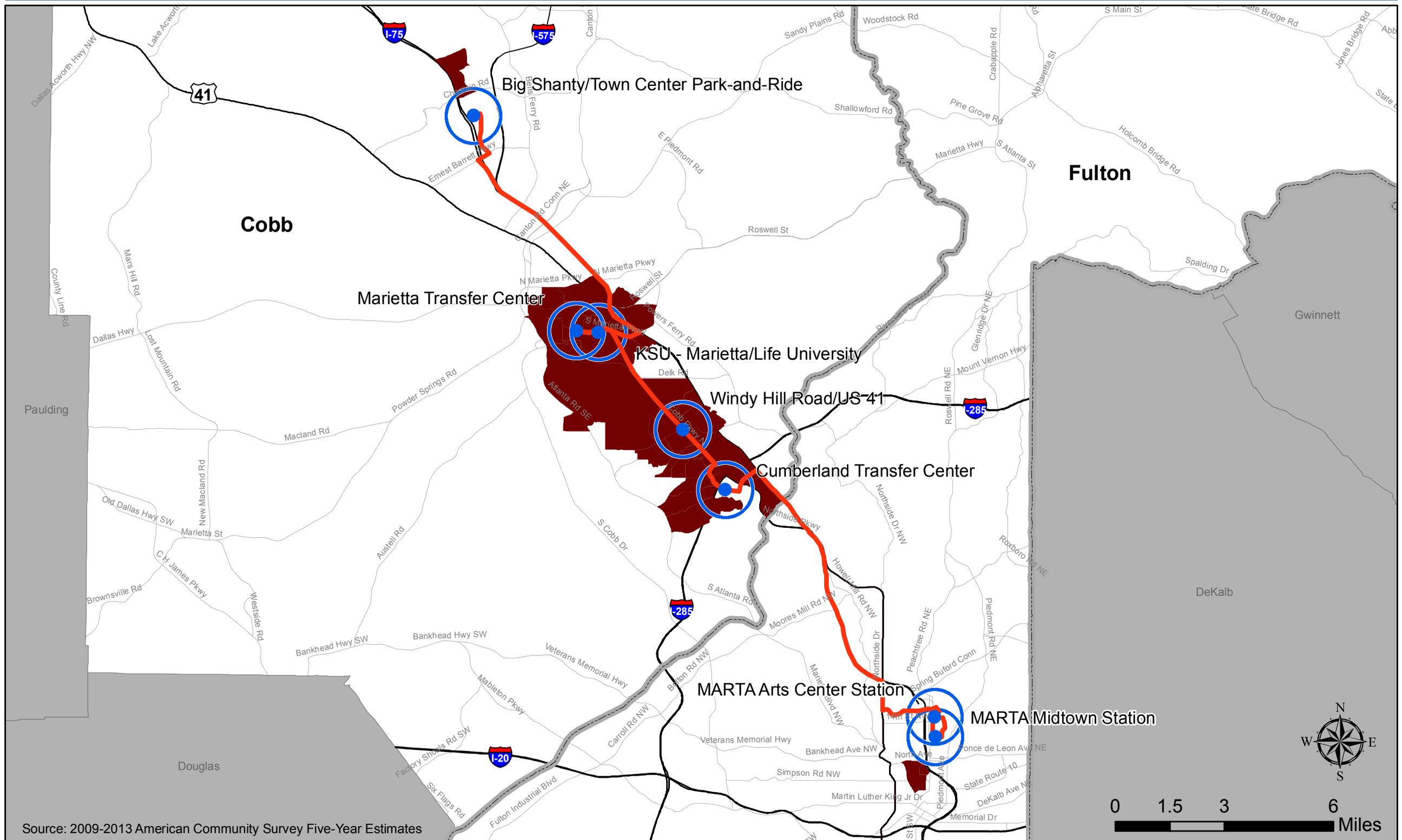


Table 3: Percent of Stop Service Area Within Minority Block Groups

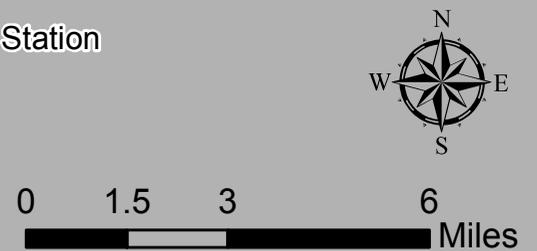
Stop	Percent of Stop Service Area
Big Shanty/Town Center Park-and-Ride	4%
KSU - Marietta/Life University	100%
Marietta Transfer Center	100%
Windy Hill Road/US 41	100%
Cumberland Transfer Center	67%
MARTA Arts Center Station	0%
MARTA Midtown Station	3%

Map 1 identifies minority block groups in Cobb and Fulton Counties that fall within the ¼-mile stop service areas.

MAP 1: MINORITY BLOCK GROUPS WITHIN THE ROUTE 10X SERVICE AREA



Source: 2009-2013 American Community Survey Five-Year Estimates



Legend

-  Fulton/Cobb Boundary
-  Stops
-  3/4 mi Stop Buffer
-  Preferred Alternative 10X
-  Minority Block Groups
-  Major Roads



Cobb County...Expect the Best!



Low-Income Populations

A similar analysis was conducted for low-income households. A household is determined as low-income by the ACS if the total household income in the last 12 months fell below the poverty line. **Table 4** provides a summary of the low-income households in Cobb County, and **Table 5** provides a summary of the low-income households in Fulton County.

Table 4: Low-Income Households in Cobb County

	Cobb County
Total Households	261,242
Low-Income Households	28,679
Percent of Low-Income Households	10.98%

Source: 2009-2013 American Community Survey Five-Year Estimates

Table 5: Low-Income Households in Fulton County

	Fulton County
Total Households	368,184
Low-Income Households	58,514
Percent of Low-Income Households	15.89%

Source: 2009-2013 American Community Survey Five-Year Estimates

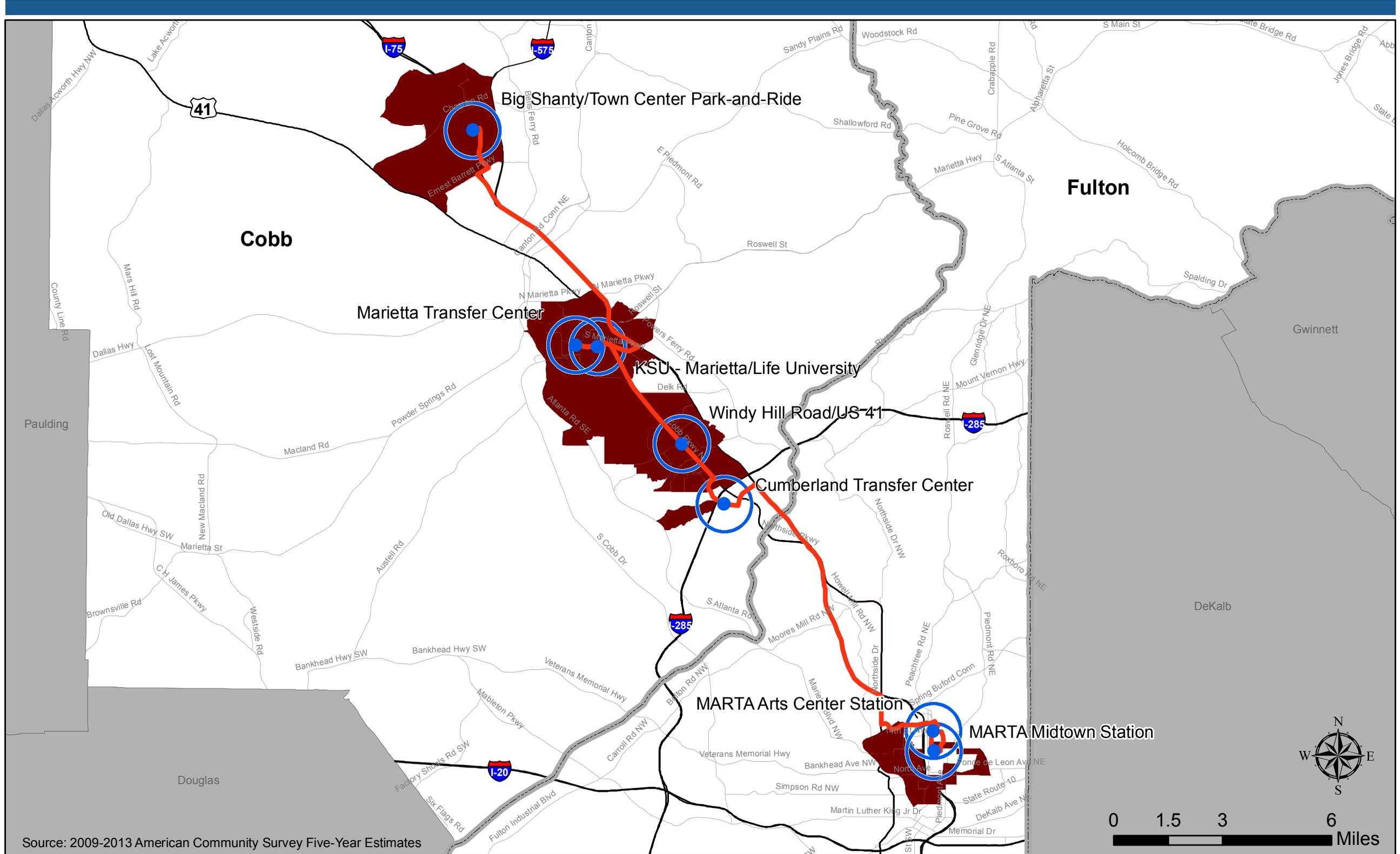
Further analysis was performed at the stop level to determine what percentage of the ¼-mile service area around each stop is part of a low-income block group. A block group is identified as a low-income block group when the percentage of low-income households in that block group exceeds the total percentage of low-income households for Cobb County (10.98%) or for Fulton County (15.89%). **Table 6** shows the breakdown below.

Table 6: Percent of Stop Service Area Within Low-Income Block Groups

Stop	Percent of Stop Service Area
Big Shanty/Town Center Park-and-Ride	95%
KSU - Marietta/Life University	100%
Marietta Transfer Center	100%
Windy Hill Road/US 41	100%
Cumberland Transfer Center	22%
MARTA Arts Center Station	13%
MARTA Midtown Station	36%

Map 2 identifies low-income block groups in Cobb and Fulton Counties that fall within the ¼-mile stop service areas.

MAP 2: LOW-INCOME BLOCK GROUPS WITHIN THE ROUTE 10X SERVICE AREA



Source: 2009-2013 American Community Survey Five-Year Estimates

Legend

- Fulton/Cobb Boundary
- Major Roads
- Stops
- Preferred Alternative 10X
- 3/4 mi Stop Buffer
- Low-Income Block Groups



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Limited English Proficiency (LEP) Persons

The number of LEP persons within Cobb County and Fulton County was also assessed using the 2009-2013 ACS estimates. The ACS data were reviewed to determine the number of people who speak English less than “very well” for each block group within the two counties. **Table 7** shows the totals for Cobb County and **Table 8** below shows the totals for Fulton County.

Table 7: Cobb County LEP Population

Population > 5	Population Speaks English less than "Very Well"	Percent LEP Population
651,092	49,865	7.66%

Source: 2009-2013 American Community Survey Five-Year Estimates

Table 8: Fulton County LEP Population

Population > 5	Population Speaks English less than "Very Well"	Percent LEP Population
885,052	55,314	6.25%

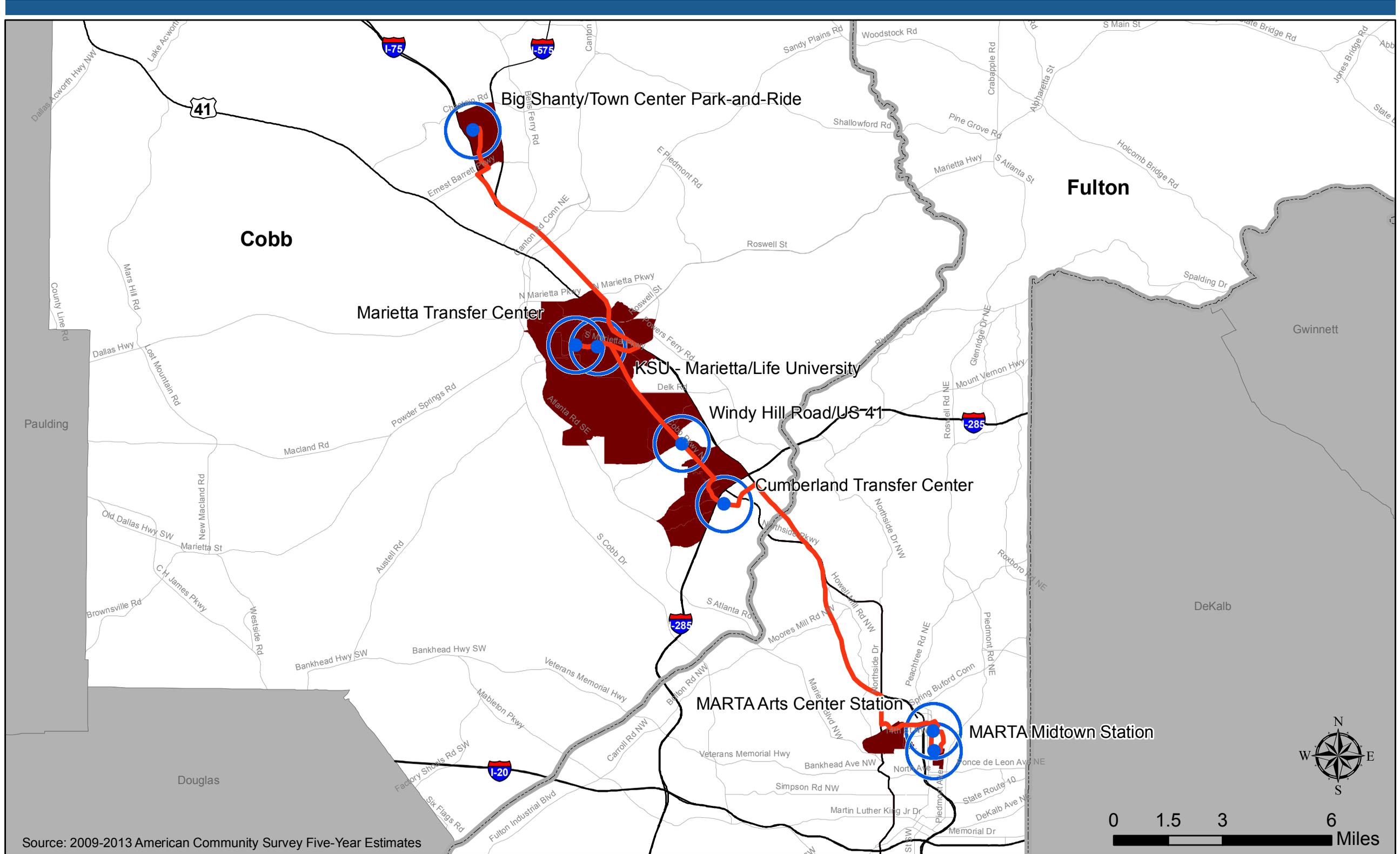
Source: 2009-2013 American Community Survey Five-Year Estimates

Further analysis was performed at the stop level to determine what percentage of the ¼-mile service area around each stop is part of a LEP block group. A block group is identified as a LEP block group when the percentage of LEP persons in that block group exceeds the total percentage of LEP persons for Cobb County (7.66%) or for Fulton County (6.25%). **Table 9** shows the breakdown below and **Map 3** identifies LEP block groups that fall within the ¼-mile stop service areas.

Table 9: Percent of Stop Service Area Within LEP Block Groups

Stop	Percent of Stop Service Area
Big Shanty/Town Center Park-and-Ride	57%
KSU - Marietta/Life University	100%
Marietta Transfer Center	100%
Windy Hill Road/US 41	59%
Cumberland Transfer Center	38%
MARTA Arts Center Station	9%
MARTA Midtown Station	12%

MAP 3: LEP BLOCK GROUPS WITHIN THE ROUTE 10X SERVICE AREA



Legend

- Fulton/Cobb Boundary
- Stops
- 3/4 mi Stop Buffer
- Preferred Alternative 10X
- LEP Block Groups
- Major Roads





Conclusions

From our demographic analysis, we can conclude the preferred Route 10X alignment adequately serves the transit dependent populations within the requirements of Title VI in addition to serving a suitable proportion of the discretionary market. This conclusion is based on the following information for the Route 10X preferred alignment:

- The average percent of the stop service area falling in a minority block group is 53 percent.
- The average percent of the stop service area falling in a low-income block group is 67 percent.
- The average percent of the stop service area falling in a LEP block group is 54 percent.

The service appears to be structured such that it is moving individuals from more affordable housing locations into the Cumberland and Midtown Atlanta employment centers.

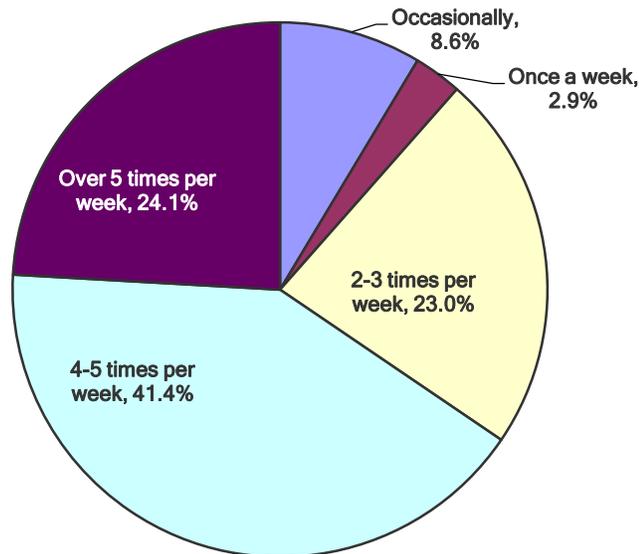


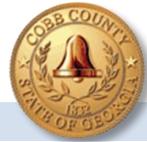
SURVEY ANALYSIS

In addition to gathering demographic data, recent survey data were also reviewed. In May 2015, an on-board survey was conducted on Cobb County buses. A total of 279 people participated in the survey. Out of those participants, 206 (73.8%) were Route 10 transit users. The survey data were used to confirm that the current Route 10 did not exclude minority or low-income participants from transit. A summary of demographic data from the survey is provided below.

Question 8 – How often do you use Route 10 (A, B, or C)?

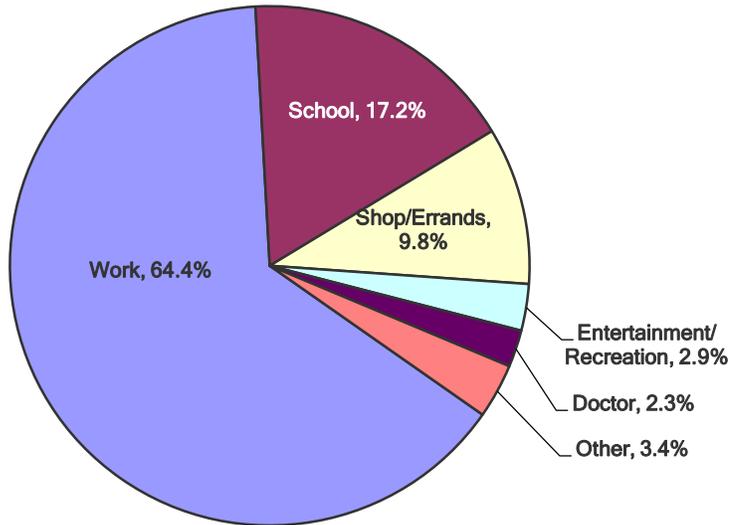
Approximately 66 percent of transit users ride the bus at least 4-5 days per week.





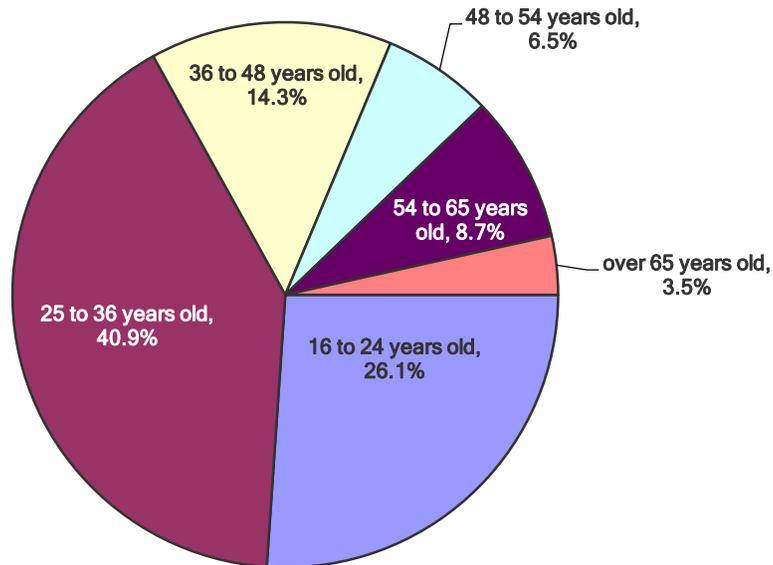
Question 11 – Why do you ride the Route 10 (A, B, or C)?

Approximately 64 percent of respondents use the bus to get to work, and 17 percent use it to get to school.



Question 16 – How old are you?

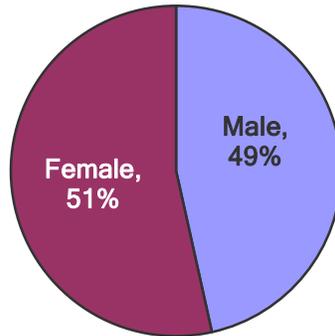
The majority of respondents are 25 to 36 years old (41%), while 11 percent are over 54 years old.





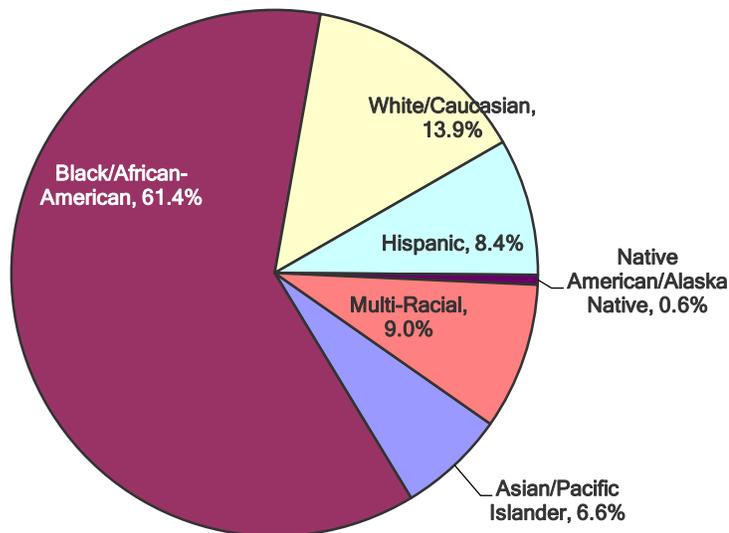
Question 17 – What gender are you?

Of the transit users surveyed, females made up 51 percent of respondents and males 49 percent.



Question 18 – What race or ethnicity are you?

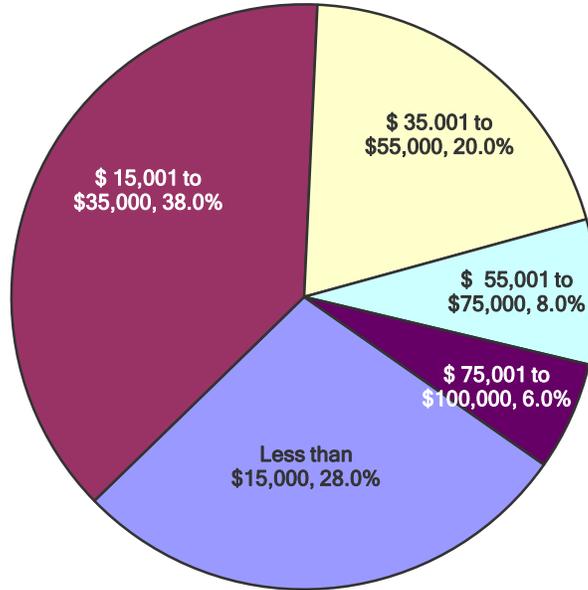
The majority of sampled riders are African-American (41%), 14 percent are Caucasian, and 9 percent are multi-racial. The remaining 16 percent are split among Hispanics (8%), Asians (7%), and Native Americans (1%). The racial makeup of transit riders has a greater percentage of minority members than Cobb County and Fulton County generally.





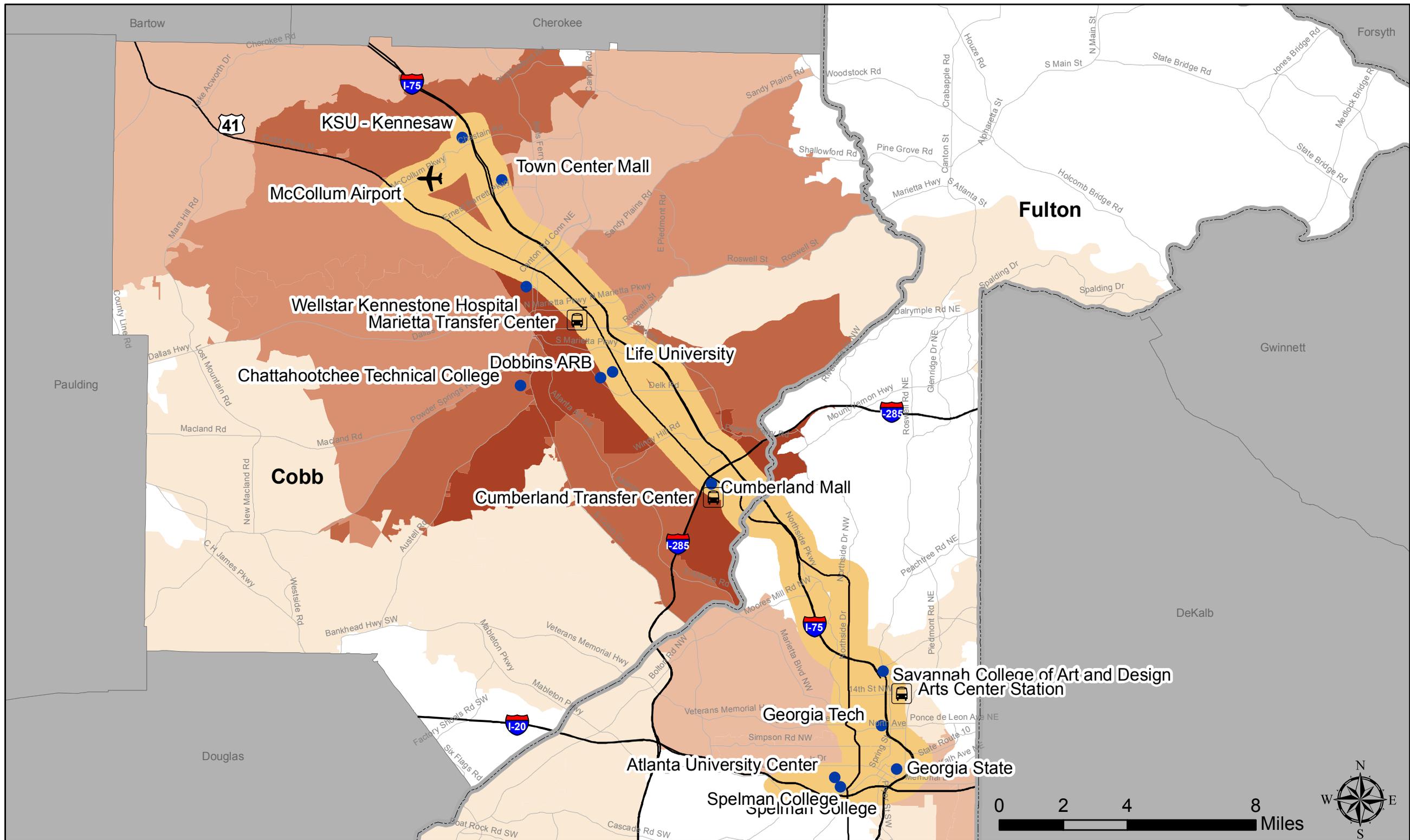
Question 19 – What is your average annual household income?

Of respondents, 28 percent earn less than \$15,000 per year, 38 percent earn between \$16,000 and \$35,000, and 34 percent earn over \$35,000 per year. A greater percentage of transit users are low-income than populations of Cobb County and Fulton County generally.



Map 4 on the next page shows how many of the survey respondents live in each ZIP Code.

MAP 4: RESPONDENT RESIDENTIAL ZIP CODES



Legend

-  Fulton/Cobb Boundary
-  Key Destinations
-  Airport
-  Route 10X Corridor
-  Transfer Center
-  Major Roads

Persons per Zip Code

- | | | |
|---|---|---|
|  1 - 2 |  6 - 11 |  18 - 26 |
|  3 - 5 |  12 - 17 | |





Conclusions

The survey analysis confirms that people of all races, income levels, and other demographic backgrounds were adequately represented in the survey. Also, public input was received from almost all of the ZIP Codes that border the preferred alternative. Given the higher levels of minority and low-income representation among transit riders during the survey than the general population, the survey analysis confirms that the current Route 10 does not exclude minority or low-income individuals from using Cobb transit service.



Attachment F-1

Description of Mobility Improvements and Major
Transit Investment Studies

Attachment F-1

Description of Mobility Improvements and Major Transit Investment Studies

(1) Park and Ride Lots

CobbLinc has proposed additional Park and Ride Lots in the 2018-2023 TIP. This project is expected to improve transit service for all bus passengers, including minority and low-income passengers in the growing Cobb County area. It is also designed to offer a viable transportation alternative to the private automobile user and provide transit service that contributes to the growth of Cobb County while improving the overall air quality.

(2) Cobb in Motion – 2040 Comprehensive Transportation Plan

The Cobb County Comprehensive Transportation Plan 2040 Update (CTP 2040) was adopted by Cobb County and the cities of Acworth, Austell, Kennesaw, Marietta, Powder Springs, and Smyrna in the summer of 2015. This plan update officially replaced the CTP 2030 previously adopted in 2008. The updated CTP serves as the blueprint for all transportation investments—vehicular, transit, freight, pedestrian, and bicycle—by Cobb County and its municipalities for the next 25 years. CTP 2040 integrally links land use and transportation within the County and its incorporated areas to efficiently and effectively address the needs identified for the transportation network through 2040.

(3) Route 10X Operation Plan

Cobb commissioners approved the county's implementation plan, in early 2017, for its Route 10X, a 26-mile limited-stop bus service running from Kennesaw State University's main campus to Atlanta, with stops including KSU's Marietta campus, Life University and SunTrust Park in Cobb County, as well as Georgia Institute of Technology, Georgia State University, and Savannah School of Art and Design.

The County is estimating in FY 2019 to roll out the service with the operating date depending on when the County buys the 12 buses needed for the route.

The Route 10X Operation Plan was initiated in 2014 and completed in 2016 in the development of a limited-stop transit service along US 41 (KSU to Cumberland) and I-75 (Cumberland to Midtown Atlanta) connecting KSU, Cumberland and Atlanta. Route 10X will provide more efficient, convenient and attractive transit service targeting university students, faculty and staff multiple locations along the corridor. Cobb County was awarded competitive regional grant funds to operate the Route 10X.

The Marietta University Enhancement Livable Centers Initiative Study recommended consideration of a transit route focused on serving the universities, linking students and other patrons between downtown/midtown Atlanta and Cobb County, recognizing the need to improve transportation options for students and staff, while also open to the general public.

(4) CobbLinc Transit Service Plan

Cobb County is currently developing the CobbLinc Transit Service Plan with a scheduled completion in early 2019. Through in-depth analysis, passenger survey, and needs assessment, the final plan will include recommendations on CobbLinc's fare structure and policies and other operating procedures. The plan will also provide a four-year system operations plan for the fixed route services with year-by-year implementation details. The process will extensively engage the public, key stakeholders, and existing fixed-route and ADA paratransit riders before such recommendations are made and during the iterative refinement process that leads to the final plan.

(5) I-285 Multi-Use Bridge

A Multi-Use bridge over I-285 in the Cumberland-Galleria activity center area of Cobb County, was constructed during this reporting period. The bridge was designed to offer new transit options to residents, workers and visitors, as well as improve access to transit for pedestrians and bicycle riders. It does not include any general purpose lanes for vehicle traffic.

The bridge is within ½ mile of existing CobbLinc bus stops which provides connectivity for pedestrians to the transit system. It is also within 3 miles of existing bus stops and connects to the County's extensive trail network, which includes existing, programmed and planned multi-use trails in the area. This trail network, which is open only to non-motorized vehicles, is used extensively by bicyclists and walkers to travel to work, shopping, cultural/entertainment and recreational activities. All CobbLinc transit buses are equipped with bike racks for ease of transition between travel modes.

In addition to the bicycle and pedestrian components of the bridge, a single dedicated 12" transit lane was a part of the bridge design. Plans are for CobbLinc to operate transit service over the bridge adjacent to the pedestrians and bicyclists. The project also includes various safety features including lighting, fencing, handrails, benches, bollards, and security cameras to protect transit patrons and enhance the user experience when accessing this facility.

Cobb County has an approved Title VI policy on the distribution of transit amenities included in this Plan as Attachment N, which focuses on items of comfort, convenience, and safety available to the general riding public in the fixed-route system. The policy was established to ensure equitable distribution of transit amenities across the system and

ensure transit riders have equal access to these amenities. This project was reviewed to ensure compliance with the CobbLinc transit amenities policy.

(6) Regional Bus Stop Signage and Amenity Upgrade Project (2018 – 2020)

As transit service has expanded in the Atlanta region with multiple agencies providing local and commuter bus services, there has been a growing need to install unified bus stop signage across the region. Currently the region’s transit agencies are providing a mix of rider information at its bus stops, with little rider information provided at the bus stops making transit trips difficult for those unfamiliar with a bus route and complicating regional bus travel.

This project addresses the needs of the region to upgrade bus stop signage with a unified, standard bus stop sign that provides consistent route information to facilitate better wayfinding. Several transit operators have numerous bus routes that overlap within the downtown/midtown Atlanta area which can be confusing and overwhelming to decipher the multitude of bus stop signs when using transit. Also, with several different bus stop signs installed in close proximity, there is no sense of a regional or seamless transportation system for transit riders travelling between jurisdictions.

The project scope includes several components to enhance the transit customer experience. First, the installation of bus stop signage with a unified, standard bus stop sign for those multi-agency bus stops and installation of the same standard bus stop sign for MARTA and Cobb County (CobbLinc) within their respective service areas. The design was completed cooperatively with participation from each of the region’s transit operators. The signage is designed to provide improved way-finding for those locations where there are multiple transit operators operating from a single bus stop and specific transit system bus stops.

Approximately 110 bus stop signs with multiple agencies route information are to be installed in the downtown/midtown Atlanta area. Additionally, both Cobb County and MARTA are installing the same standard bus stop sign as part of local Bus Stop Signage Upgrade/Replacement projects at selected locations within their respective service areas. The estimated number of bus stops signs to be installed is 477 for Cobb County and 8,800 for MARTA. To ensure consistency and coordination in project delivery, as well as take advantage of economies of scale, all participating regional transit operators are pursuing a joint solicitation for the fulfillment of bus stop signage needs specified in the project.

The second component of the Regional Bus Stop Signage and Amenity Upgrade project is that in addition to the signage, Cobb County will upgrade other aspects of physical bus stops in the CobbLinc system to improve the comfort, convenience and safety of transit riders. New shelters, benches and trash receptacles will be installed at various locations throughout the system. Additionally, following an inventory of transit facilities within the

County, bus stop lighting, safety issues, ADA access and sidewalk improvements and other identified enhancements will be prioritized and addressed accordingly.

Cobb County has an approved Title VI policy on the distribution of transit amenities included in this Plan as Attachment N, which focuses on items of comfort, convenience, and safety available to the general riding public in the fixed-route system. The policy was established to ensure equitable distribution of transit amenities across the system and ensure transit riders have equal access to these amenities. Prior to expenditures being made, the amenities policy will be applied to each of the proposed project elements to ensure Title VI compliance will be achieved.



Attachment G

Fixed Facility Impact Analysis of Construction Projects

ATTACHMENT G

Fixed Facility Impact Analysis

Since the last submission of the Title VI Program in 2015, there were no construction related projects in which a Fixed Facility Impact Analysis was required. CobbLinc will ensure that all regulations and requirements as outlined in FTA Circular 4702.1B will be conducted and documented accordingly. This attachment has been reserved for future documentation.

- *Land Use Changes:*
- *Air Quality:*
- *Noise Impacts:*
- *Water Quality:*
- *Wetlands:*
- *Threatened and Endangered Species:*
- *Construction/Utilities:*



Attachment H

Public Involvement Plan

ATTACHMENT H

PUBLIC INVOLVEMENT PLAN

CobbLinc is committed to developing and maintaining an effective citizen participation process. In order to accomplish this commitment, the public involvement process should be guided by the following principles:

- (1) Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities.
- (2) Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- (3) Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
- (4) Using different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities, so that communications are tailored to the particular community or population.
- (5) Implementing DOT's policy guidance concerning recipients' responsibilities to LEP persons to overcome barriers to public participation.

PUBLIC PARTICIPATION GOAL:

The proactive public involvement process for transportation planning shall provide complete information, timely public notice, and full public access to key decisions; and shall support early and continuing involvement of the public in developing Transportation Improvement Programs (TIPs).

Public Input

Consideration of public input shall be an integral part of the CobbLinc decision-making process. In coordination with the Planning Division of Cobb County DOT, CobbLinc shall conduct noticed public hearings prior to the implementation of transit plans and projects, recommended as part of the County's long-range transportation plan and TIP. CobbLinc will ensure that the notices of the public hearings are distributed to media outlets serving minority communities.

CobbLinc will provide an opportunity for the public to comment during public meetings of prior to any final action. Demonstrate explicit consideration and responses to public input received during planning and program development processes.

Public Access

The public shall be provided timely notice and reasonable access to information about transportation issues and processes. CobbLinc plans and documents shall be made available for the public to review at the CobbLinc office and its website.

In compliance with the Americans with Disabilities Act, individuals needing special accommodations to participate in meetings should contact CobbLinc at least three working days prior to the scheduled meeting.

All meetings and workshops of CobbLinc and its advisory committees shall be held in ADA-compliant venues where and when public transportation is available to encourage participation by Title VI communities. All meetings and workshops of the CobbLinc Transportation Advisory committees are open to the public, except as allowed by The Brown Act.

CobbLinc will continue to outreach to the minority communities by inclusion on mailing lists, issuing specific invitations to participate.

Formal Public Meetings

Public Meetings are held prior to a decision point and are a formal means to gather citizen comments and positions from all interested parties for public record and input into the decision making process. CobbLinc public meetings are necessary for the adoption of major plans (e.g. Transit Development Plans, and programming of money (e.g. Transportation Improvement Programs). Public meeting notices are published in a general circulation newspaper citing the time, date, and place of the hearing. CobbLinc will accept prepared comments from the public during the period between the notice and hearing date. These comments will be considered part of the public record. Also during this period, CobbLinc staff will accept questions and provide clarification on issues raised by the public.

List of Organizations Partnered with CobbLinc:

Central Atlanta Progress
Georgia Commute Options (GCO)
Georgia Communities Coalition
Cumberland Community Improvement District (CID)
Town Center Area CID
Midtown Alliance
Cobb Douglas Service Board (CSB)
Cobb Senior Services (CSS)
Department of Human Services (DHS)
Department of Family & Children Services (DFCS)
Cobb County School District
Kennesaw State University
Life University
Chattahoochee Technical College
WellStar
Kaiser Permanente Medical Transport Management, Inc.
Right in the Community (RITC)
Tommy Nobis Center

Visual Rehabilitation Services (VRS) of Smyrna
National Association for the Advancement of Colored People (NAACP)

CobbLinc will partner with these community organizations who will often times, host, advertise and disseminate information to targeted populations (such as low-income and minority populations).



Attachment I

CobbLinc Public Participation Policy on Major
Services and Fare Changes

ATTACHMENT I

COBBLINC PUBLIC PARTICIPATION POLICY – FARE AND MAJOR SERVICE CHANGES

Purpose

To establish a policy for public participation regarding proposed fare changes or major service changes of CobbLinc.

General Provisions

1. The term “governing body” refers to the governmental entity – elected and/or appointed – with operating authority over a transit service provider funded in part with Federal Transit Administration (FTA) funds allocated to CobbLinc either directly to CobbLinc or through the Cobb County Department of Transportation (Cobb DOT). The Cobb County Board of Commissioners is CobbLinc’s governing body.
2. All meetings described below – governing body meeting and any separate public meeting to receive comments – must be held in ADA accessible facilities.
3. CobbLinc, when proposing a service or fare change, will make reasonable accommodations for members of the public who are disabled.

Policy

1. This policy applies to a fare increase or decrease and a service increase or major service reduction. This policy does not apply to a temporary fare decrease or service increase as would occur, for example, for a special event. A major service reduction is defined as any of the following:
 - a. The elimination of an entire route or a portion of a route that reduces the geographic area of transit service area. The realignment of a route or elimination of a portion of a route when existing or new service will still be available within one-quarter mile of the previous alignment will not be considered a major service reduction.
 - b. A reduction in the service hours of any route of at least 20 percent of the total hours operated on the route on a daily basis.
 - c. The elimination of at least 20 percent of the stops on a route – cumulative during a rolling one-year period.

2. A major service increase is defined as any of the following:
 - a. The creation of an entire route or an expansion of a route that extends the geographic area of transit service area a least a one-half mile in length.
 - b. An increase in the service hours of any route of at least 10 percent of the total hours operated on a daily basis, or an increase in service of the number of days of the week that any route operates.
3. When a fare increase or major service reduction is considered by a transit operator, the following steps, at a minimum, will be taken to ensure an adequate public comment process:
 - a. Notice of the proposed major service reduction or fare increase with specific information regarding the existing and proposed service or fare levels. The notice will announce the starting and ending dates of a minimum 30-day public comment period. The notice will also announce a public meeting(s) and public hearing to be held during the required comment period. The public meeting will be held within Cobb County at a facility that is accessible through the use of public transit services. The meeting(s) will be scheduled at times that transit services are available to facilitate attendance by transit users. The notification will include the posting of documentation at Marietta Transfer Center shelters, Cumberland Transfer Center shelters, and all bus stops with shelters and inside all vehicles.
 - b. At least 15 days prior to the governing body's public hearing, written notice will also be published in the appropriate local newspaper – *Marietta Daily Journal*– and a local Spanish paper, as a paid advertisement of notice.
 - c. Prior to the commencement of the comment period, notice will be provided to Cobb DOT staff for display on the DOT website. Also, information shall be available at CobbLinc offices.
 - d. The governing body of CobbLinc will be informed of the comment period and proposed major service decrease or fare increase. The governing body may be informed prior to or during the public comment period.
 - e. During the comment period, the governing body of CobbLinc will hold a public hearing. The public hearing shall be placed on the regular agenda to allow for discussion and public comment to be received by the governing body.
 - f. Following the completion of the comment period, the conduct of the public meeting(s), and public hearing before the governing body, the proposed major service decrease or fare increase will be discussed at a meeting of the governing body of CobbLinc. Any comments received during the public comment period will be documented. The

documentation must be available for public review and distributed to the governing body of the transit operator prior to taking action. The governing body will act on the proposed service reduction or fare increase after consideration of comments received.

4. When a fare decrease or major service increase is proposed by CobbLinc, the change shall be publicized in the following manner:
 - a. Notice of the proposed major service increase or fare decrease with specific information regarding the existing and proposed service or fare levels shall be posted at Marietta Transfer Center shelters, Cumberland Transfer Center shelters, all bus stops with shelters and inside all vehicles. Information shall be posted at least 15 days prior to scheduled consideration by the governing body of CobbLinc.
 - b. The governing body of CobbLinc will be informed of the proposed major service increase or fare decrease. The topic of the proposed major service increase or fare decrease shall be placed on the regular agenda for discussion to allow for public comment to be received by the governing body.
 - c. At least 15 days prior to the change, notice shall be provided to Cobb DOT staff for display on the DOT website. Also, information shall be available at CobbLinc offices.
 - d. Written notice will be transmitted to appropriate media outlets – including the *Marietta Daily Journal* and a local Spanish paper – to encourage media coverage. Publishing of a legal notice is not required.



Attachment J

Procedures for Monitoring Transit Service and
Subrecipient Compliance

ATTACHMENT J

PROCEDURES FOR MONITORING TRANSIT SERVICE AND SUBRECIPIENT COMPLIANCE

CobbLinc conducts periodic compliance assessments to verify that the transit service is provided to minority communities and minority users in an equitable manner consistent with the objectives of Title VI. This compliance assessment also applies to any Subrecipient of CobbLinc. The following compliance assessment process is intended to identify areas of possible noncompliance, if any, and implement corrected actions, if needed, independent of FTA actions.

MONITORING TITLE VI

- The Engineer IV is designated as Cobb DOT Title VI Officer. The Transit Operations Manager is designated as CobbLinc Title VI officer.
- In order to determine and maintain Title VI compliance as part of CobbLinc's decision-making process and as an integral part of transit management and contract administration, all proposed services and service changes will be reviewed by the Title VI Officer.
- In concert with CobbLinc's aforementioned service standards and policies, the CobbLinc Title VI Officer will evaluate system-wide service changes and proposed improvements, at the planning and programming stages, to determine whether the overall benefits and costs of such changes or improvements are distributed equally, and are not discriminatory.
- In the event of any finding of possible noncompliance with Title VI requirements, or disparate impacts CobbLinc's Title VI Officer will report such findings to the DOT Director and the County Manager, along with the recommended corrective actions.

MONITORING QUALITY OF TRANSIT AND SUBRECIPIENT SERVICES

Periodic service monitoring activities will be undertaken to compare the level and quality of service provided to predominantly minority area. Monitoring will be conducted once every three years in accordance with guidance outlined in the Title VI Circular. Monitoring will consist of the following procedures:

- CobbLinc will select a sample of bus routes that provide service to a demographic cross-section of the recipient's population.

- CobbLinc will assess the performance of each route in the sample for each of the recipient's service standards and policies.
- CobbLinc will compare the transit service observed in the assessment to the established service policies and standards.

RESULTS OF MONITORING QUALITY OF SERVICE

The Title VI Monitoring activities and compliance assessment will take place in FY 2019 and FY 2020 prior to the CobbLinc FY 2021 Title VI update and will be conducted at a minimum, once every three years.

MONITORING OF SERVICE CUTS

As of January 2011, CobbLinc has not implemented any service cuts. However, if reductions should occur, CobbLinc will evaluate potential service cuts by monitoring each route to determine the least performing, as well as the routes that would have the least impact on customers, including minority and low income groups.

In all cases changes are implemented with a great deal of public input. This includes public forums, town hall and community meetings, focus groups and passenger surveys done at both the local and the regional level.

TRANSIT COMMITTEES

CobbLinc has several committees to review various aspects of its operations and to ensure service is delivered equitably. The County strives to ensure all Committees have a diverse make-up reflective of the Community by notifying targeted community groups of vacancies as they occur and recruiting throughout the community.

CobbLinc has a standing committee of citizens called the Transit Advisory Board (TAB), which holds monthly meetings. To focus specifically on the needs of the disability community, another group of citizens and professionals in the disability community hold bi-monthly meetings with CobbLinc. This committee is known as the Accessibility Advisory Committee (AAC). Additionally, CobbLinc also holds an internal staff meeting each month known as the Transit Service Evaluation Committee which consists of DOT, CobbLinc, and contracted staff persons. One of the regular activities of this committee is to consider any citizen requests for service additions or modifications.

Name of Committee	Hispanic	Black	Caucasian	Asian	Other
Cobb County Population*	12.6%	25.9%	53.8%	5.0%	2.7%
Accessibility Advisory Committee	0.0%	14.3%	85.7%	0.0%	0.0%
Transit Advisory Board	8.3%	41.7%	41.7%	8.3%	0.0%

* Source: 2012-2016 American Community Survey 5-Year Estimate

SUBRECIPIENT PROCEDURES

Currently, Cobb County only has one sub recipient who is implementing construction projects along CobbLinc routes, consisting of pedestrian access and traffic signal improvements. Title VI requirements are passed through to subrecipient and its subcontractors via the contractual Agreement between Cobb County and the subrecipient. CobbLinc has obtained a copy of subrecipient Title VI program to review for compliance to ensure the following:

- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations
- Ensure meaningful access to programs and activities by persons with LEP
- Compliance with general reporting requirements
- Assessment of the Subrecipient Title VI documentation to ensure requirements of the FTA Circular 4702.1B are being met

Cobb County conducts periodic project management meetings to discuss progress and adherence to all federal and local requirements, including Title VI. Any updates or revisions to the subrecipient's Title VI Program will be required to be submitted to the County every three years.



Attachment K

Title VI Resolution

RESOLUTION

Resolution authorizing the submission of grant applications and performance of various grant management activities with the Federal Transit Administration, an operating administration of the United States Department of Transportation, for Federal transportation assistance authorized by 49 U.S.C. chapter 53, title 23 United States Code and other Federal statutes administered by the Federal Transit Administration.

WHEREAS, the Federal Transit Administration has been delegated authority to award Federal financial assistance for a transportation project; and

WHEREAS, the grant or cooperative agreement for Federal financial assistance will impose certain obligations upon Cobb County, and may require Cobb County to provide the local share of the project cost; and

WHEREAS, Cobb County has provided or will provide all annual certifications and assurances to the Federal Transit Administration required for the project;

NOW, THEREFORE, BE IT RESOLVED by the Cobb County Board of Commissioners:

1. That the Chairman of Cobb County Board of Commissioners is authorized to execute grant awards and cooperative agreements, annual Certifications and Assurances and perform various grant management activities on behalf of Cobb County with the Federal Transit Administration for Federal assistance authorized by 49 U.S.C. Chapter 53, Title 23, United States Code, or other Federal statutes authorizing a project administered by the Federal Transit Administration. Cobb County Government has received authority from the designated recipient, the Metropolitan Atlanta Rapid Transit Authority (MARTA), to apply for Urbanized Area Formula Program assistance.
2. That the Chairman of Cobb County Board of Commissioners is authorized to file with its applications the annual certifications and assurances and other documents the Federal Transit Administration requires before awarding a Federal assistance grant or cooperative agreement.

CERTIFICATION

The undersigned duly qualified Chairman of the Cobb County Board of Commissioners, acting on behalf of the Cobb County Board of Commissioners, certified that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Cobb County Board of Commissioners held on January 24, 2017.

This 28th day of Feb., 2018


 Mike Boyce, Chairman
 Cobb County Board of Commissioners





Attachment L

Racial Make-Up of Transit-Related, Non-Elected
Boards, Advisory Councils or Committees

ATTACHMENT L

RACIAL MAKE-UP OF TRANSIT-RELATED, NON-ELECTED BOARDS, ADVISORY COUNCILS OR COMMITTEES

CobbLinc has several committees to review various aspects of its operations and to ensure service is delivered equitably. The County strives to ensure all Committees have a diverse make-up reflective of the Community by notifying targeted community groups of vacancies as they occur and recruiting throughout the community.

CobbLinc has a standing committee of citizens called the Transit Advisory Board (TAB), which holds monthly meetings. To focus specifically on the needs of the disability community, another group of citizens and professionals in the disability community hold bi-monthly meetings with CobbLinc. This committee is known as the Accessibility Advisory Committee (AAC).

Additionally, CobbLinc also holds an internal staff meeting each month known as the Transit Service Evaluation Committee which consists of DOT, CobbLinc, and contracted staff persons. One of the regular activities of this committee is to consider any citizen requests for service additions or modifications.

Name of Committee	Hispanic	Black	Caucasian	Asian	Other
Cobb County Population*	12.6%	25.9%	53.8%	5.0%	2.7%
Accessibility Advisory Committee	0.0%	14.3%	85.7%	0.0%	0.0%
Transit Advisory Board	8.3%	41.7%	41.7%	8.3%	0.0%

* Source: 2012-2016 American Community Survey 5-Year Estimate



Attachment M

Disproportionate Burden Policy

ATTACHMENT M

DISPROPORTIONATE BURDEN POLICY

This policy established a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1B:

The policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly and cannot be altered until the next [Title VI] program submission. At the conclusion of the analysis, if the transit provider finds that low-income populations will bear a disproportionate burden of the proposed fare/service change, the transit provider should take steps to avoid, minimize, or mitigate impacts where practicable. The transit provider should describe alternatives available to low-income populations affected by the fare/service changes.

CobbLinc's Disproportionate Burden Threshold to determine the adverse impacts of a major service change (as defined in the first part of this document) or a fare adjustment is established at 25 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.



Attachment N

Transit Amenities Policies

ATTACHMENT N

TRANSIT AMENITIES POLICY

Transit amenities are described as follows by the FTA Circular 4702.1B:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This... is not intended to impact funding decisions for transit amenities. Rather, this applies after a transit provider has decided to fund an amenity.

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters, benches, trash receptacles, and park-and-ride facilities. The location of transit amenities is determined by factors such as ridership, individual request, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).

Amenities are provided upon request from citizen or government official; terrain of land is adequate for the installation of a shelter; the availability of right of way is adequate; space is available; erection of a shelter does not block the visibility of homes or businesses; and within CobbLinc budget. Permission from city is required for locations within municipal city limits.

Bus Shelters

County policy states that shelters are considered for installation based on the following criteria:

- Stops where more than 10 passengers board each day.
- An existing bus stop is required.
- Distribution of shelters county-wide is without regard to race, color, or national origin of the surrounding community as to not discriminate.
- Locations for shelters with advertisements are chosen by the vendor based on the visibility and traffic.

Bus Stop Benches

Benches are considered for installation based on the following criteria:

- Stops where more than 10 passengers board each day.
- An existing bus stop is required.
- Distribution of benches county-wide is without regard to race, color, or national origin of the surrounding community as to not discriminate.

Trash Receptacles

Trash receptacles are considered for installation based on the following criteria:

- Stops where more than 10 passengers board each day.
- An existing bus stop is required.
- Distribution of trash receptacles county-wide is without regard to race, color, or national origin of the surrounding community as to not discriminate.

Next Bus Arrival Signage

Electronic signage informing passengers of the predicted arrival of the next bus for a given route can significantly improve the experience for customers. The County's policy with respect to electronic bus arrival signage is to install signage at locations meeting the following criteria:

- The location is a multi-modal transit center.
- The location is served by multiple routes.
- Ridership is high at the location.
- Funding is available for installation/maintenance.



Attachment O

Vehicle Assignment Policy

ATTACHMENT O

VEHICLE ASSIGNMENT POLICY

Vehicle assignment is described as follows by FTA Circular 4702.1B:

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy on how these vehicles will be deployed throughout the service area.

CobbLinc currently has three general types of buses in the fleet, all of which are maintained to the same strict standards:

- 40-foot Nova Buses
- 40-foot New Flyer Buses
- 45-foot MCI Buses

The age of the vehicles is taken into consideration when assigning to routes; however low-floor buses are assigned to all local routes. All buses are maintained to run any route at any given time. Low-floor buses are deployed on frequent service and high-ridership routes, and carry a higher share of ridership than their numerical proportion of the overall bus fleet. All buses are equipped with air conditioning, automated stop announcements and security cameras. There are only low-floor 40-foot buses in the fleet designated for local service due to the operating characteristics of the routes.

In short, buses are not assigned to specific communities within Cobb County based on vehicle age or size but rather to serve specific routes that call for them based on the needs of that route. Many of the routes and runs serve multiple communities with diverse populations.



Attachment P

Disparate Impact Policy

ATTACHMENT P

DISPARATE IMPACT POLICY

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations. Per FTA Circular 4702.1B:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...

The policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.

In the course of performing a Title VI Equity Analysis, CobbLinc must analyze how the proposed action would impact minority as compared to non-minority populations. In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceed the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, CobbLinc must evaluate whether there is an alternative that has more equitable impact. Otherwise, CobbLinc must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold to determine if the adverse impacts of a major service change (as defined in the first part of this document) or fare adjustment is established at 25 percent on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.



Attachment Q

Systemwide Service Standards

ATTACHMENT Q

SYSTEMWIDE SERVICE STANDARDS

Pursuant to requirements set forth in the Federal Transit Administration's (FTA) Circular 4702.1B, CobbLinc must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service.

The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry:

- A. Vehicle Load
- B. Vehicle Headways
- C. On-Time Performance
- D. Service Availability

For the purposes of defining service standards and policies for CobbLinc fixed-route service, the agency has split its system into two route categories:

- Local: Routes designed to carry passengers between major passenger hubs, employment centers, and residential neighborhoods.
- Express: Designed to be limited stop routes that connect with MARTA Rail Stations and downtown employment centers and are operated out of 8 park and ride lots.

The categories were not developed to, and in fact do not, differentiate routes by minority or income status of the areas or passengers served.

A. VEHICLE LOAD

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standard for peak and off-peak times for each mode of fixed-route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.

CobbLinc calculates Vehicle Load Factor by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route. Vehicle Load Factor is monitored regularly to ensure customer comfort and to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns.

B. VEHICLE HEADWAY

Vehicle headway is described as follows by FTA Circular 4702.1B:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measure in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., four buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off-peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15-minute peak headways and 30-minutes off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.

CobbLinc calculates headway by determining the average length of time between buses on each route during peak and off-peak times. In the event a route regularly exceeds Vehicle Load Factor standards, CobbLinc will evaluate whether frequency on that route should be adjusted within the confines of existing or expected funding levels.

C. ON-TIME PERFORMANCE

On-time performance is described as follows by FTA Circular 4702.1B:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a schedule run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route.

Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measure against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed “on-time” window.

A bus is determined to be late if it departs its scheduled “time point” five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure. It is CobbLinc’s goal to be on-time at least 95 percent of the time. On-time performance is tracked and also included within monthly performance reports to CobbLinc. Discussions with bus operators are also used to identify vehicle scheduling issues which are corrected through service changes.

D. SERVICE AVAILABILITY

Service availability/transit access is described as follows by FTA Circular 4702.1B:

Service availability is a general measure of the distribution of routes within a transit provider’s service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.

CobbLinc’s goal is to ensure 80 percent of county residents live within walking distance (i.e., one quarter mile) of a bus stop. CobbLinc service is particularly strong in communities with significant minority and low-income populations. Transit access is determined by mapping all active bus stops within the system and then calculating the population (based on 2010 Census data) within one-quarter mile radii of those stops. This information is then compared to the total county population.



Appendix A

Limited English Proficiency (LEP)

- A-1 LEP Language Spoken at Home Table
- A-2 LEP Survey Results

APPENDIX A-1

LEP TABLE OF LANGUAGE SPOKEN

Language Spoken at Home – Cobb County			
Population 5 years and over	671,058	+/-30	671,058
English only	529,795	+/-3,527	78.9%
Language other than English	141,263	+/-3,523	21.1%
Speak English less than "very well"	52,200	+/-1,533	7.8%
Spanish	80,617	+/-2,588	12.0%
Speak English less than "very well"	35,325	+/-2,049	5.3%
Other Indo-European languages	31,711	+/-1,968	4.7%
Speak English less than "very well"	8,091	+/-1,057	1.2%
Asian and Pacific Islander languages	18,123	+/-1,287	2.7%
Speak English less than "very well"	7,297	+/-811	1.1%
Other languages	10,812	+/-1,471	1.6%
Speak English less than "very well"	1,487	+/-452	0.2%

Source: 2011-2015 American Community Survey



LIMITED ENGLISH PROFICIENCY (LEP) SURVEY

Dear Staff Member,

We need your input in determining the amount of interaction between staff members and clients who speak English with limited proficiency. Please take a few moments to answer these brief questions. This will assist us to determine additional needs for translation and interpretation services that ensure the best possible service to all patrons, regardless of their language of origin.

Best Regards,

Maurice A. Jones

Maurice A. Jones, Transit Operations Manager

Providing your name on this form is not required.

1. On average, how often do you assist customers with limited English proficiency?
___ Times per Day Week Month
2. On average, how much time do you spend working with customers that have limited English proficiency?
___ Hours per Day Week Month
3. Do you use outside sources (Volunteer Services), other than family to assist with translations/interpreting?
 Frequently Sometimes Never What Source(s): _____
4. How often do you use family, friends, or other persons brought by the clients to do translations/interpreting?
 Frequently Sometimes Never
5. How often do these encounters involve situation where children provide interpretation?
 Frequently Sometimes Never
6. In order of frequency, which language groups do you encounter when working with limited English proficient clients? **(1 being the most frequent and 7 being the least)**
___ Spanish ___ Bosnain ___ Russian ___ Arabic ___ African ___ Asian Other: _____
7. Have you ever used a translation/interpretation service? Yes No
If yes, check any that apply In Person Co-Worker Volunteer Telephone
8. Are you comfortable and qualified to interpret another language? Yes No
Language(s): _____
9. Are you comfortable and qualified to translate another language? Yes No
Language(s): _____

Limited English Proficiency (LEP) Survey - 1 of 3

Division	1					2				
	0-1 times per month	2-4 times per month	1-2 times per week	3-4 times per week	1 time or more per day	0-1 hours per month	Up to 2 hours per week	3-4 hours per week	Up to 1 hours per week	2 hours or more per day
Customer Service	0%	40%	20%	40%	0%	20%	40%	20%	0%	20%
Paratransit Drivers	73%	0%	13%	13%	0%	93%	7%	0%	0%	0%
Fixed Routes - Regular	Circular	40%	20%	20%	0%	20%	60%	40%	0%	0%
	RT 10	0%	0%	40%	0%	60%	0%	0%	0%	40%
	RT 15	33%	0%	17%	0%	50%	40%	0%	0%	20%
	RT 20	17%	0%	0%	17%	67%	17%	0%	17%	33%
	RT 25	0%	0%	100%	0%	0%	0%	100%	0%	0%
	RT 30	14%	0%	14%	14%	57%	29%	0%	14%	29%
	RT 40	0%	0%	0%	100%	0%	0%	100%	0%	0%
	RT 45	0%	0%	0%	33%	67%	0%	33%	33%	33%
	RT 50	20%	0%	0%	20%	60%	40%	0%	0%	40%
Subtotal	14%	2%	21%	20%	42%	21%	30%	7%	22%	20%
Fixed Routes - Express	RT 100	60%	0%	20%	0%	20%	80%	20%	0%	0%
	RT 101	50%	0%	0%	0%	50%	50%	0%	0%	50%
	RT 102	60%	0%	0%	0%	40%	60%	0%	20%	20%
	RT 476	100%	0%	0%	0%	0%	100%	0%	0%	0%
	RT 480	0%	50%	0%	0%	50%	50%	0%	0%	50%
	Subtotal	54%	10%	4%	0%	32%	68%	4%	4%	24%

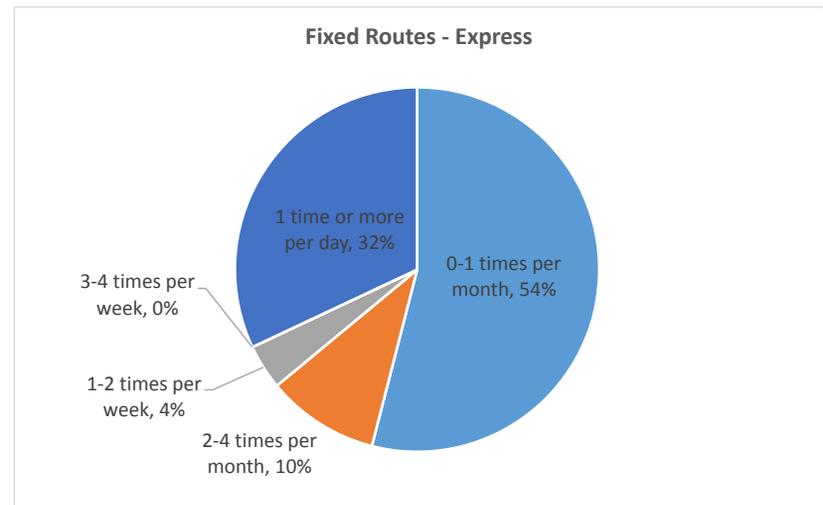
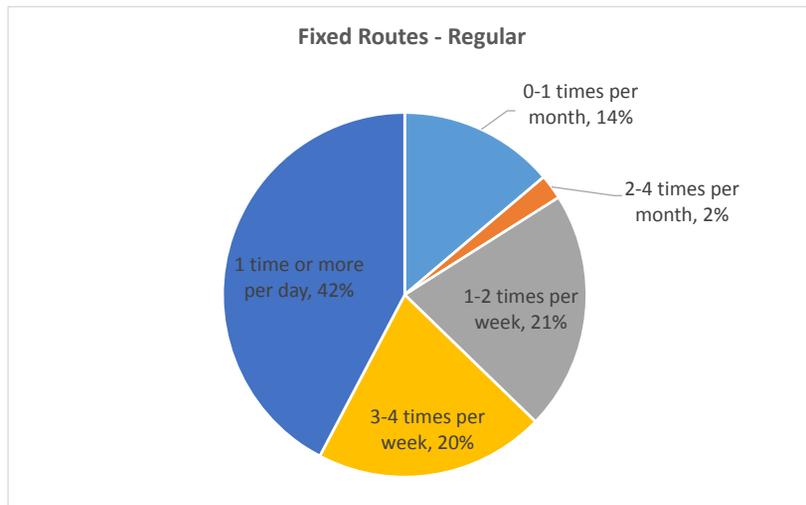
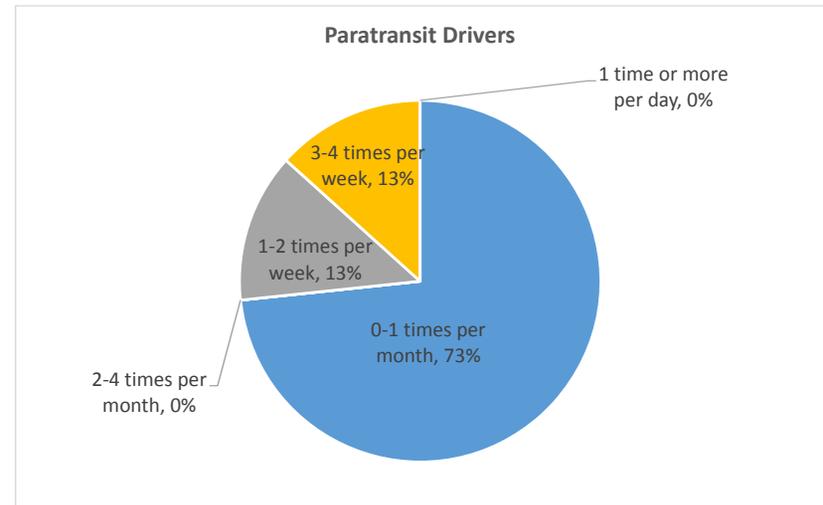
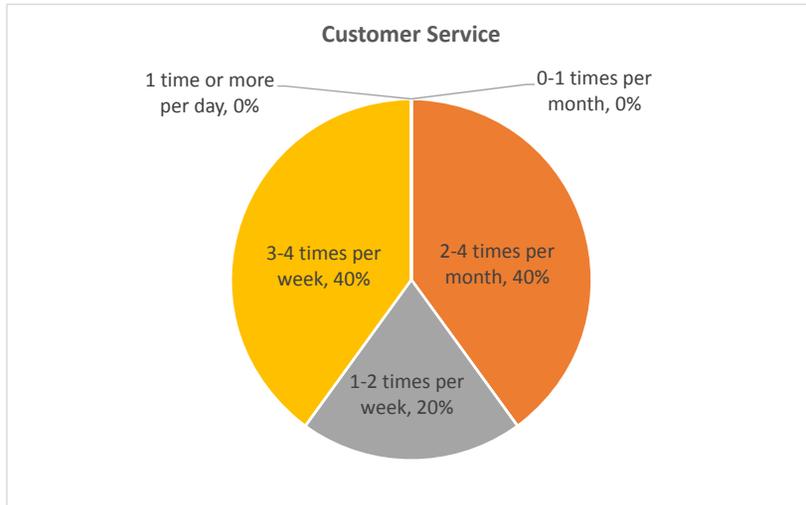
Limited English Proficiency (LEP) Survey - 2 of 3

Division	3			4			5			6		
	Frequently	Sometimes	Never	Frequently	Sometimes	Never	Frequently	Sometimes	Never	Spanish	African	
Customer Service	0%	60%	40%	0%	40%	60%	40%	60%	0%	63%	38%	
Paratransit Drivers	7%	20%	73%	7%	20%	73%	13%	27%	60%	67%	33%	
Fixed Routes - Regular	Circular	0%	0%	100%	0%	20%	80%	0%	20%	80%	100%	0%
	RT 10	0%	40%	60%	0%	80%	20%	0%	100%	0%	83%	17%
	RT 15	0%	50%	50%	17%	33%	50%	17%	33%	50%	100%	0%
	RT 20	0%	33%	67%	0%	50%	50%	17%	50%	33%	71%	29%
	RT 25	0%	0%	100%	0%	100%	0%	0%	100%	0%	100%	0%
	RT 30	0%	43%	57%	14%	43%	43%	43%	29%	29%	70%	30%
	RT 40	100%	0%	0%	0%	100%	0%	100%	0%	0%	100%	0%
	RT 45	0%	100%	0%	33%	67%	0%	67%	33%	0%	75%	25%
	RT 50	20%	0%	80%	20%	40%	40%	20%	40%	40%	57%	43%
Subtotal	13%	30%	57%	9%	59%	31%	29%	45%	26%	84%	16%	
Fixed Routes - Express	RT 100	0%	40%	60%	0%	20%	80%	20%	20%	60%	100%	0%
	RT 101	0%	50%	50%	0%	50%	50%	0%	50%	50%	50%	50%
	RT 102	0%	40%	60%	0%	40%	60%	0%	25%	75%	67%	33%
	RT 476	0%	25%	75%	0%	0%	100%	0%	25%	75%	100%	0%
	RT 480	0%	50%	50%	0%	50%	50%	0%	100%	0%	67%	33%
	Subtotal	0%	41%	59%	0%	32%	68%	4%	44%	52%	77%	23%

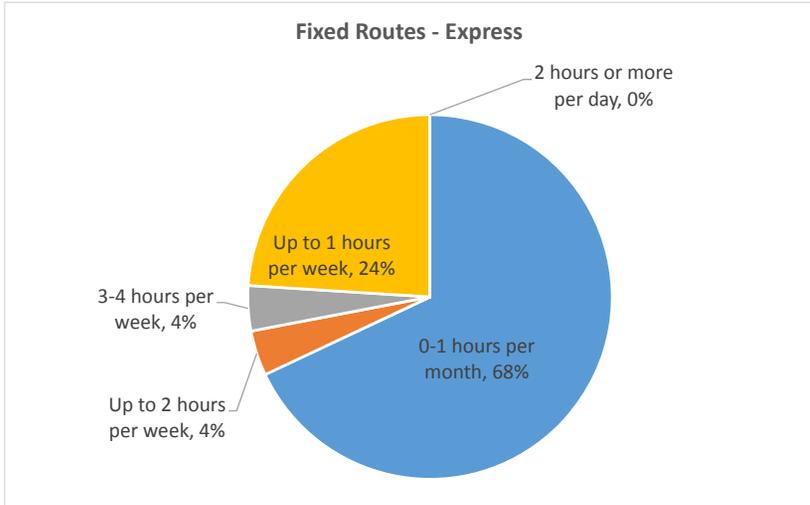
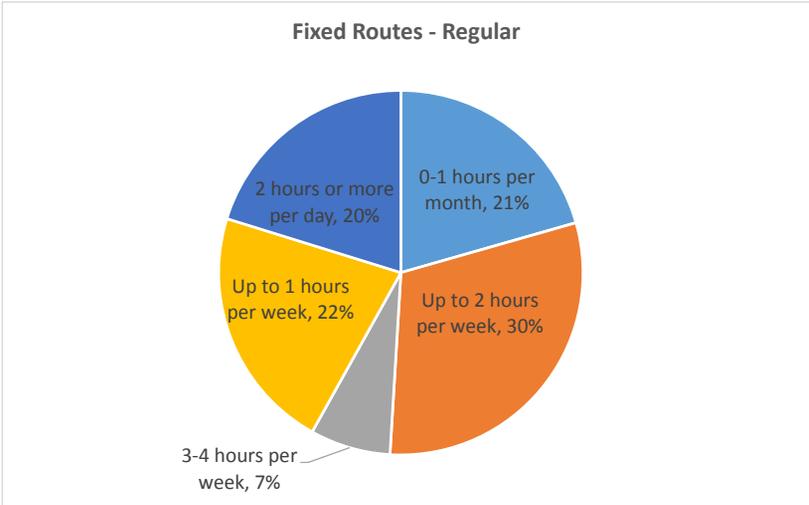
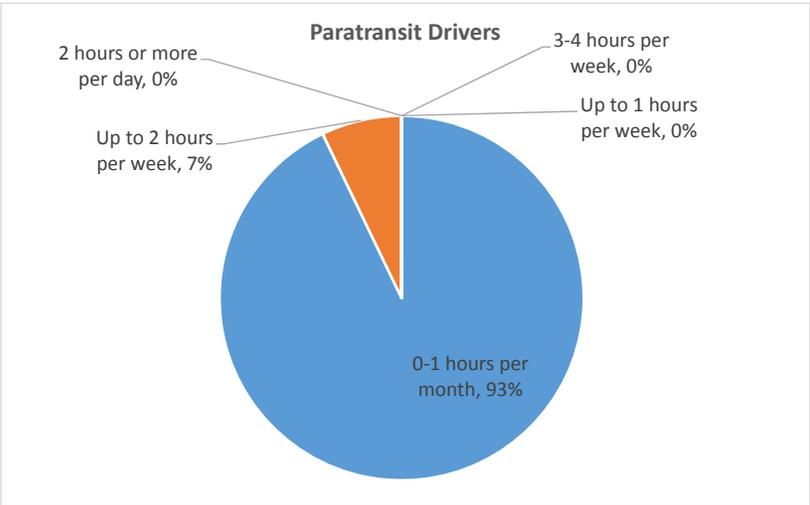
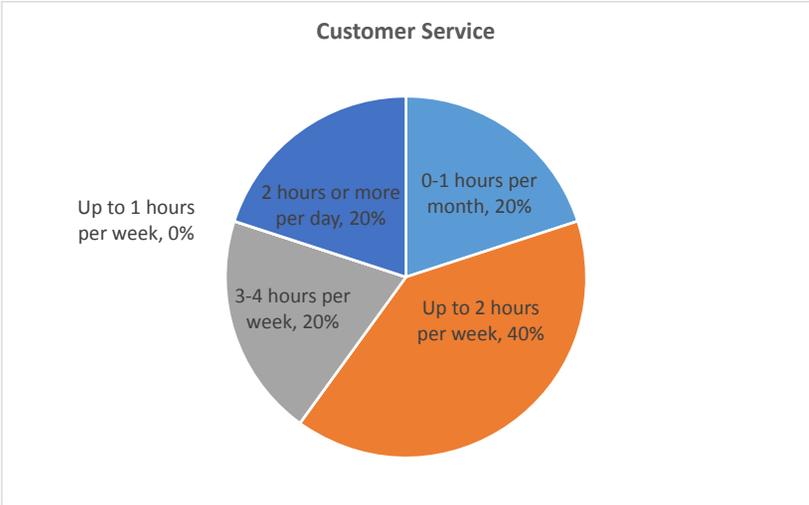
Limited English Proficiency (LEP) Survey - 3 of 3

Division		7		8		9	
		Yes	No	Yes	No	Yes	No
Customer Service		80%	20%	0%	100%	0%	100%
Paratransit Drivers		7%	93%	13%	87%	13%	87%
Fixed Routes - Regular	Circular	0%	100%	40%	60%	40%	60%
	RT 10	20%	80%	40%	60%	40%	60%
	RT 15	17%	83%	17%	83%	17%	83%
	RT 20	0%	100%	33%	67%	17%	83%
	RT 25	0%	100%	0%	100%	0%	100%
	RT 30	0%	100%	29%	71%	29%	71%
	RT 40	0%	100%	0%	100%	0%	100%
	RT 45	0%	100%	33%	67%	33%	67%
	RT 50	20%	80%	40%	60%	20%	80%
	Subtotal	6%	94%	26%	74%	22%	78%
Fixed Routes - Express	RT 100	0%	100%	0%	100%	0%	100%
	RT 101	100%	0%	0%	100%	0%	100%
	RT 102	20%	80%	40%	60%	40%	60%
	RT 476	25%	75%	25%	75%	25%	75%
	RT 480	0%	100%	0%	100%	0%	100%
	Subtotal	29%	71%	13%	87%	13%	87%

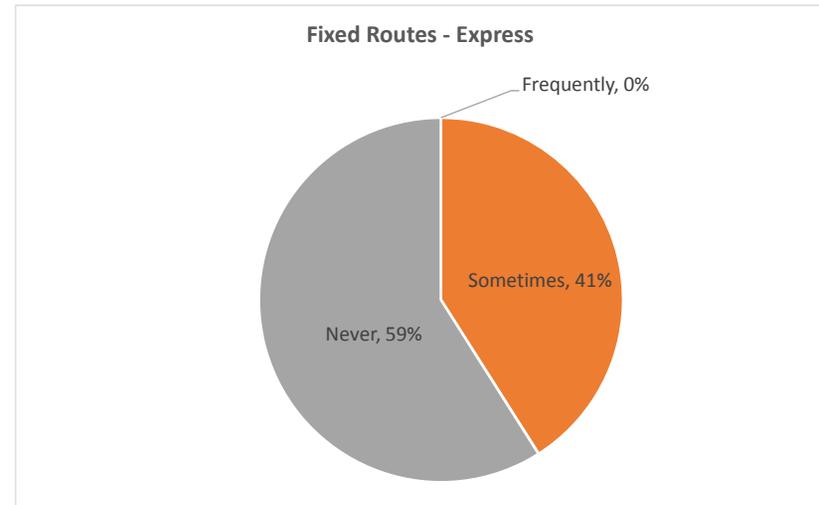
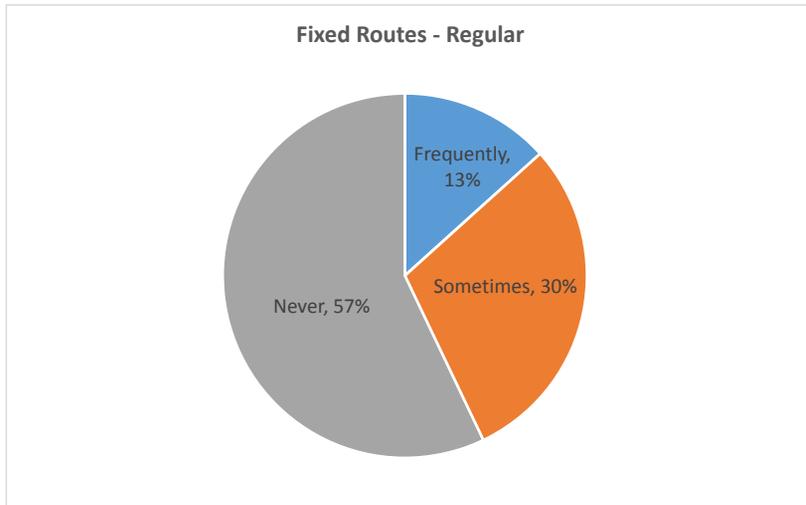
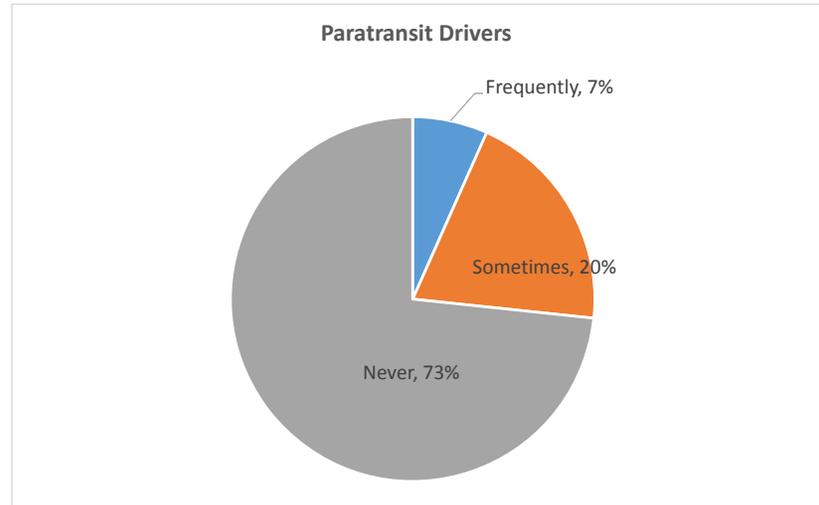
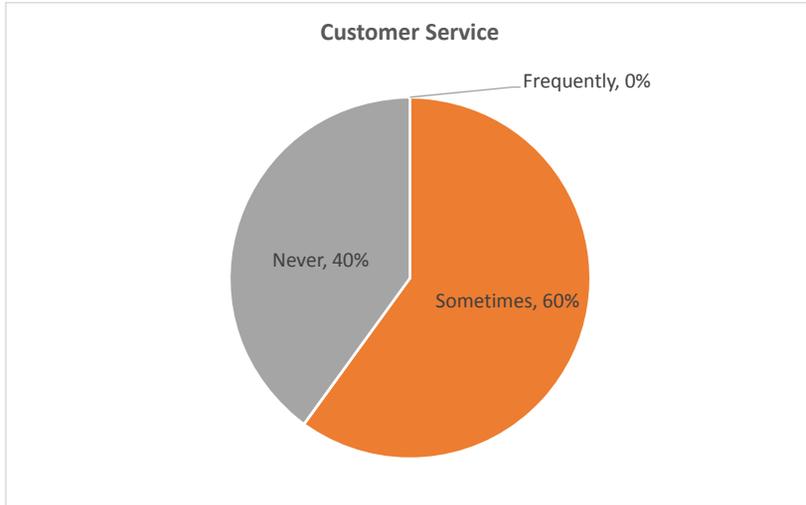
1. On average, how often do you assist customers with limited English proficiency?



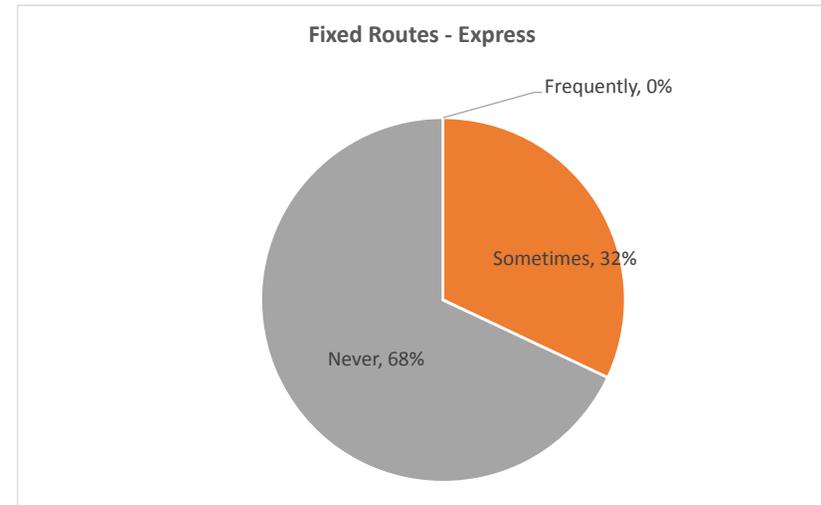
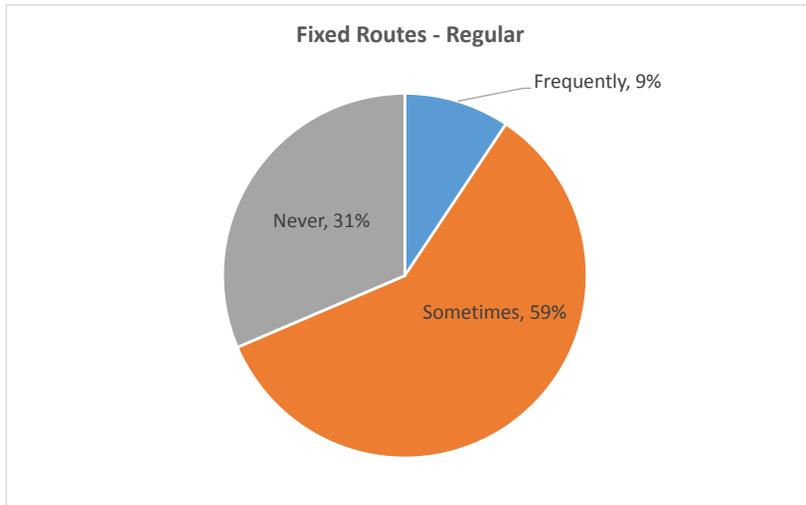
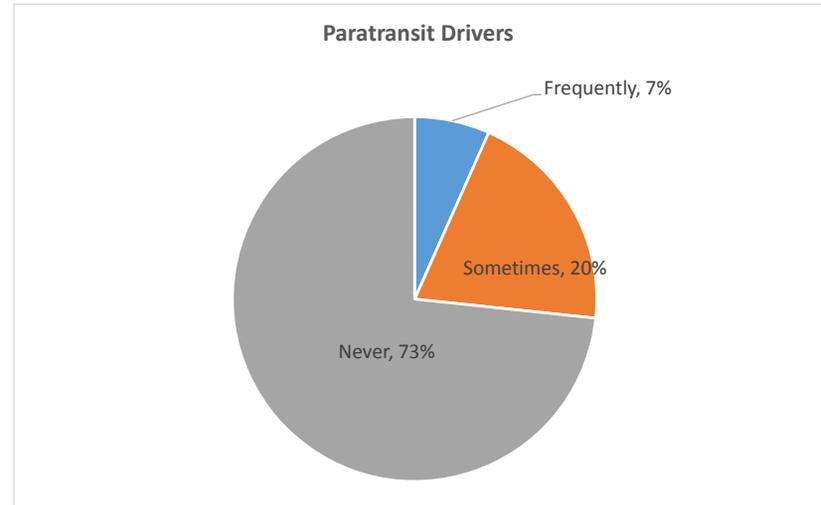
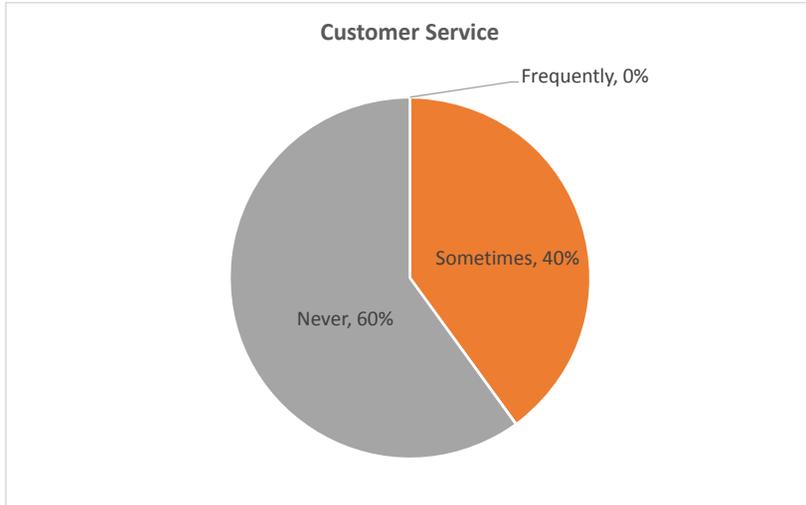
2. On average, how much time do you spend working with customers that have limited English proficiency?



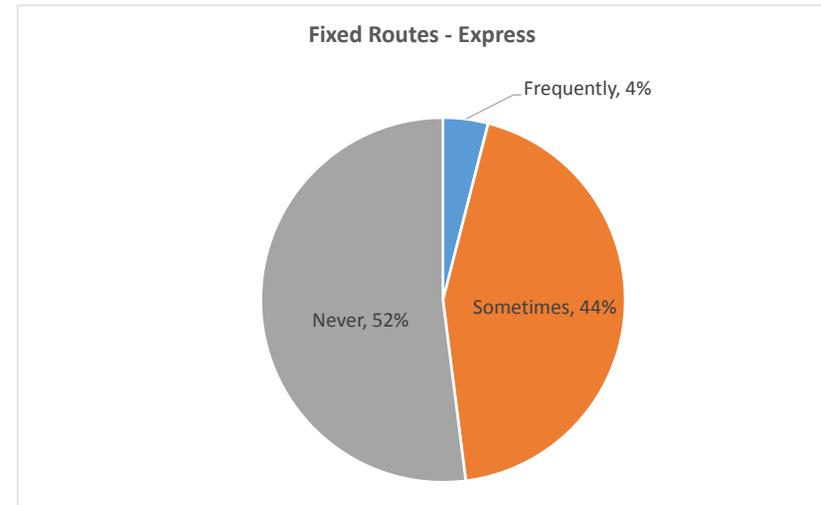
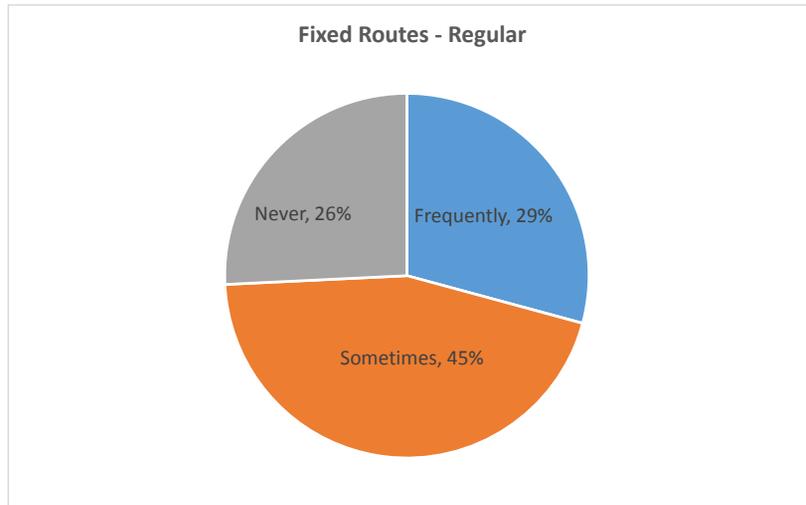
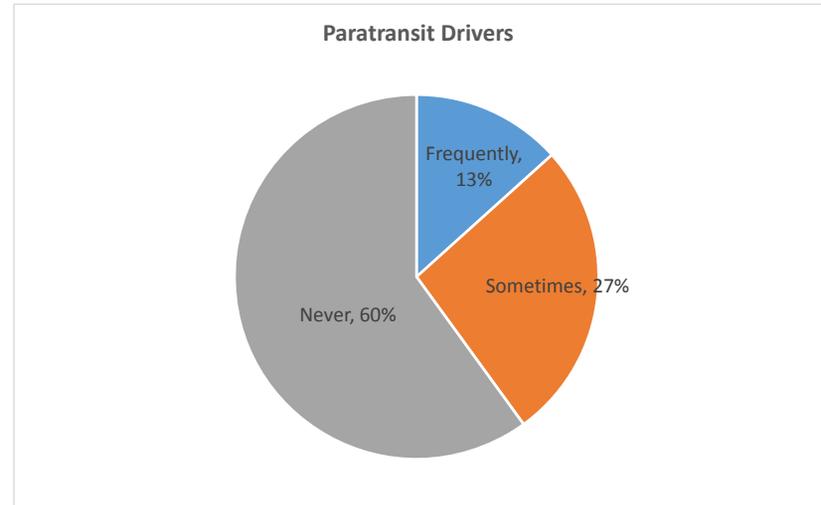
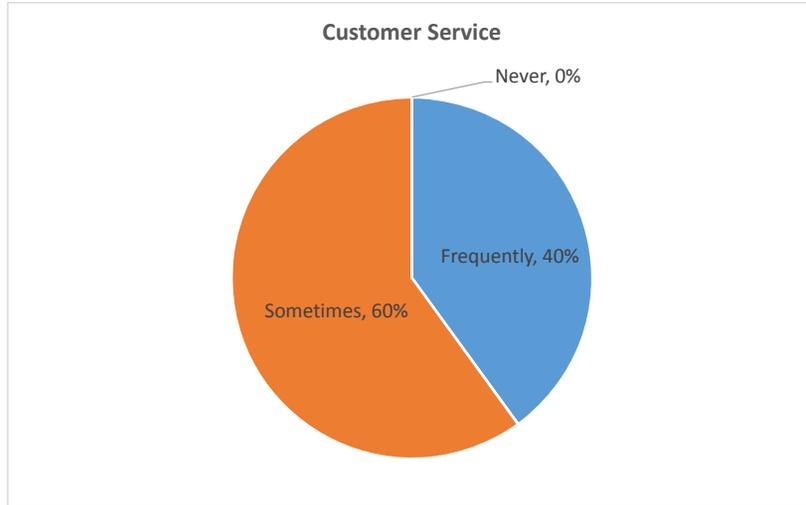
3. Do you use outside sources (Volunteer Services), other than family to assist with translations/interpreting?



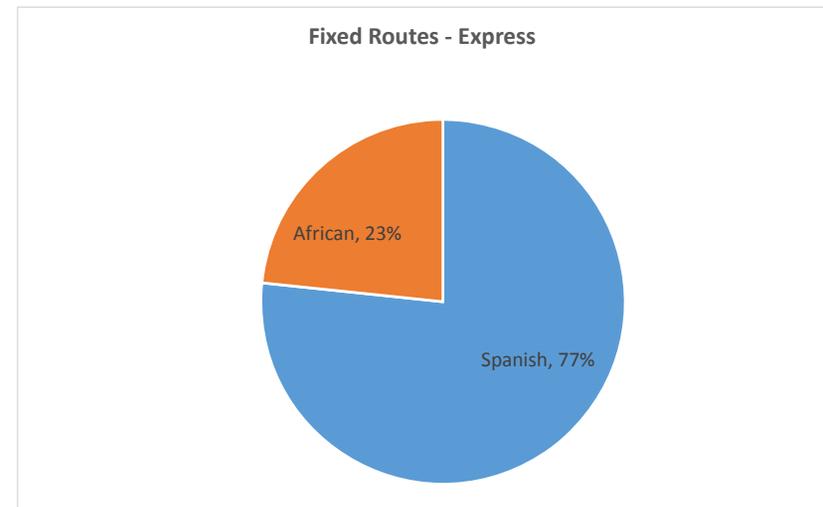
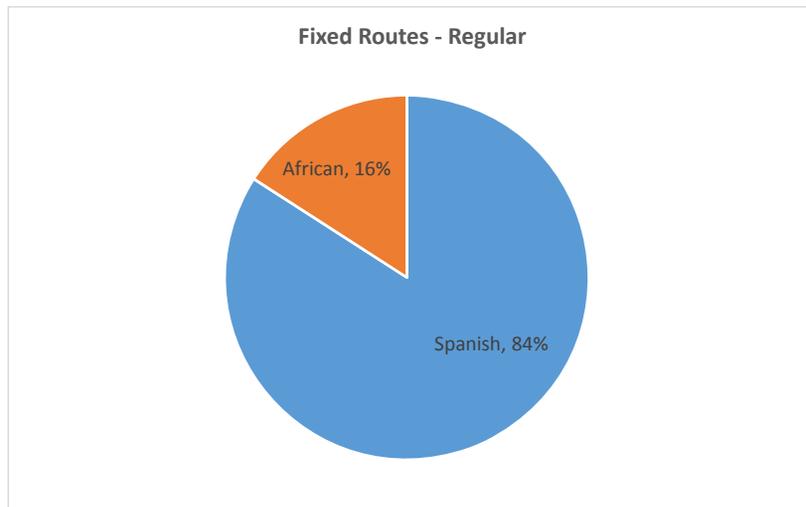
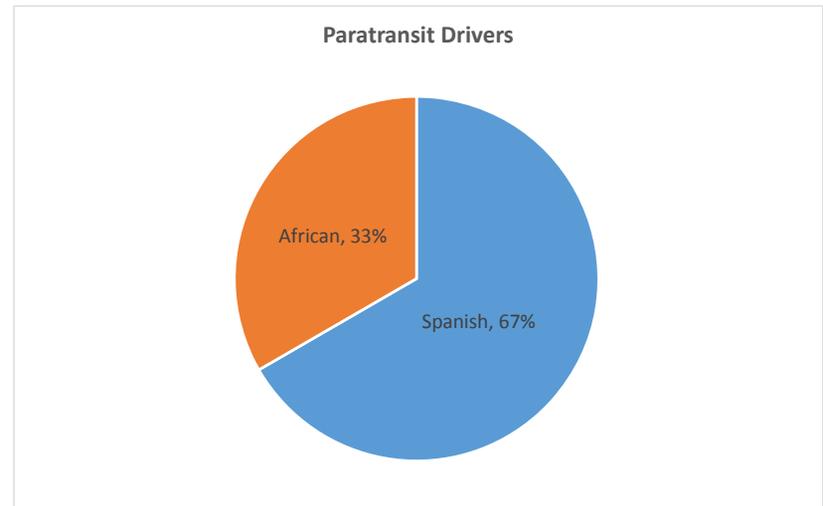
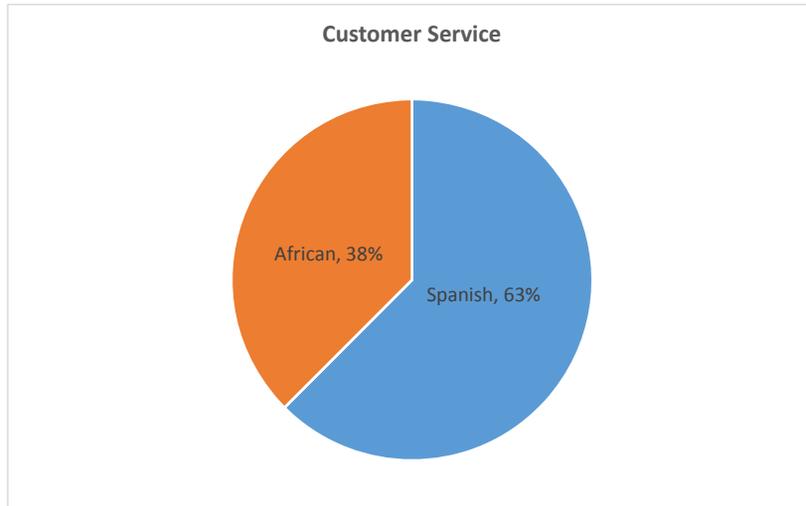
4. How often do you use family, friends, or other persons brought by the clients to do translations/interpreting?



5. How often do these encounters involve a situation where children provide interpretation?

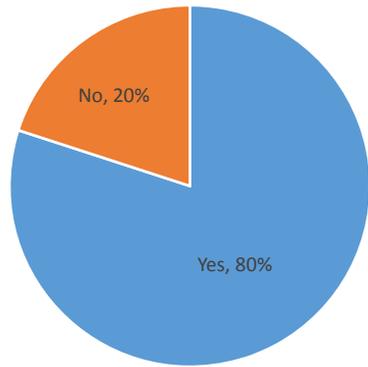


6. In order of frequency, which language groups do you encounter when working with limited English proficient clients?

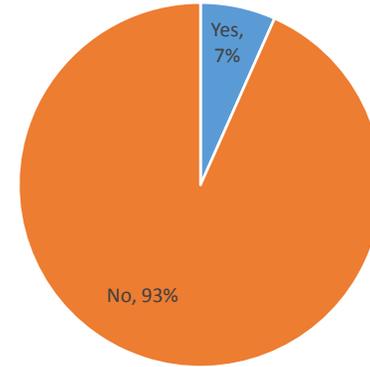


7. Have you ever used a translation/interpretation service?

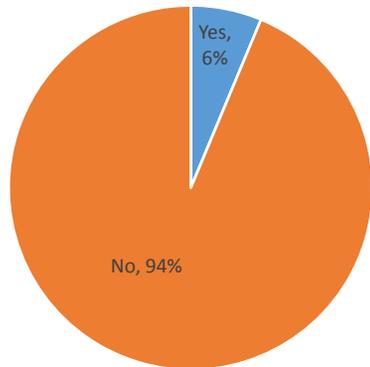
Customer Service



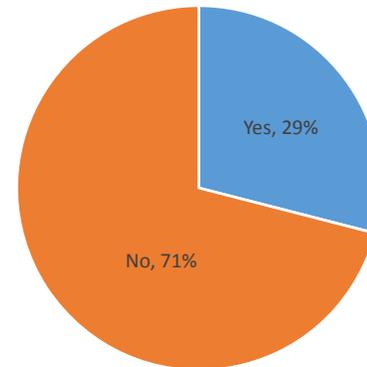
Paratransit Drivers



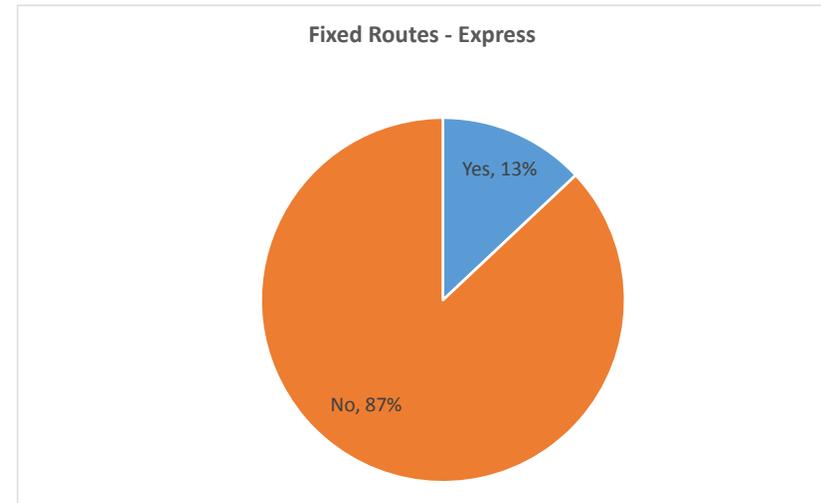
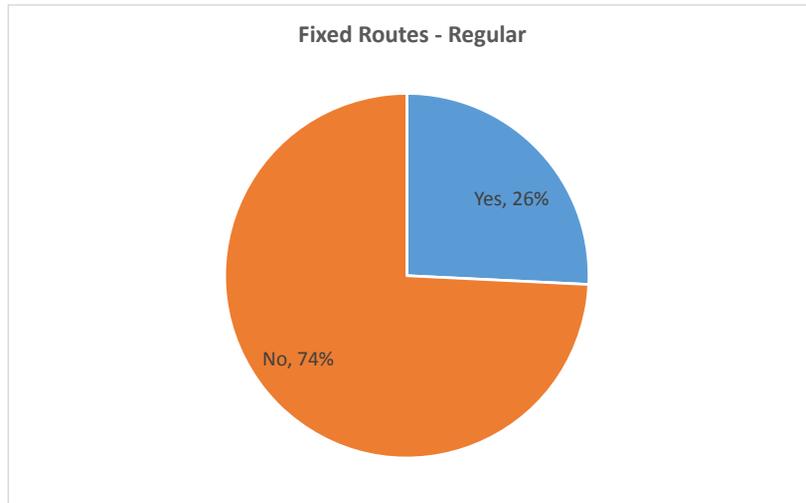
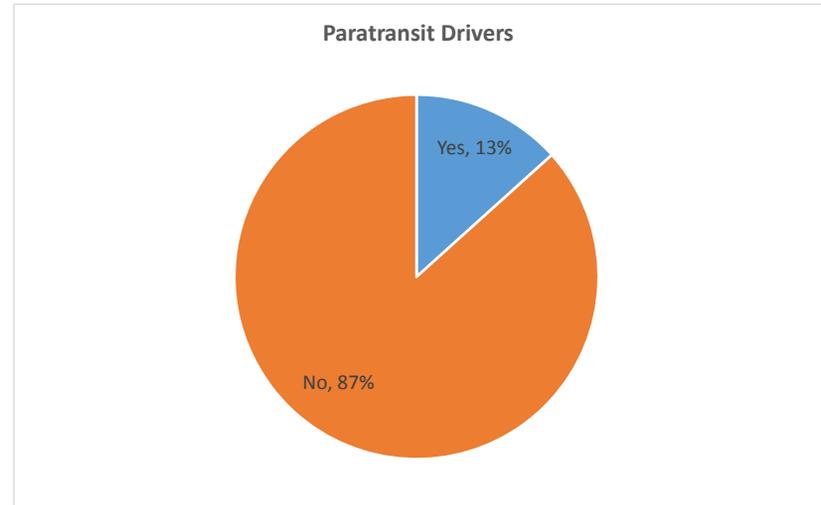
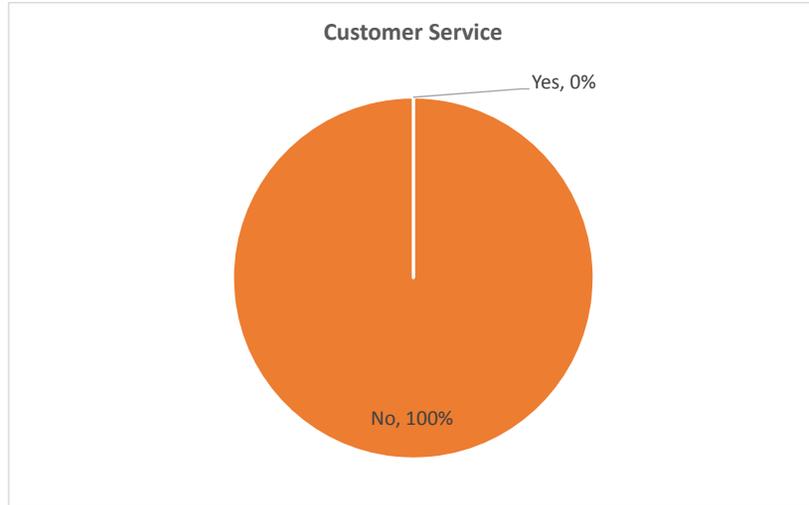
Fixed Routes - Regular



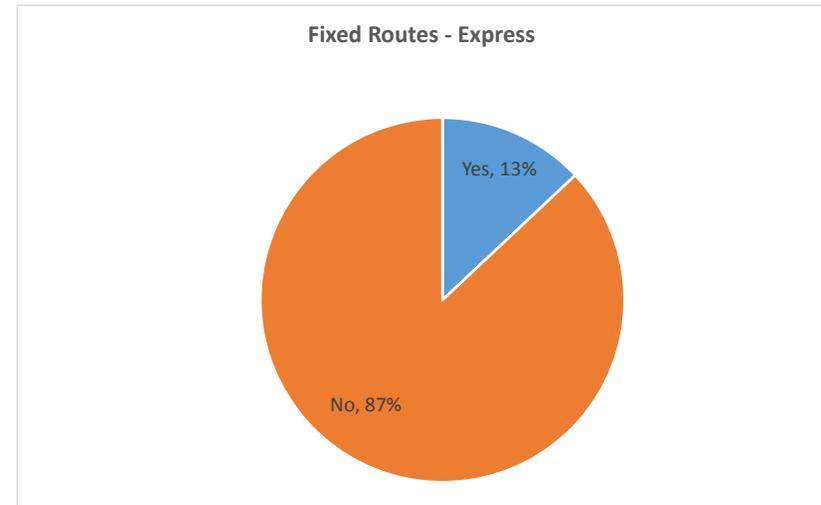
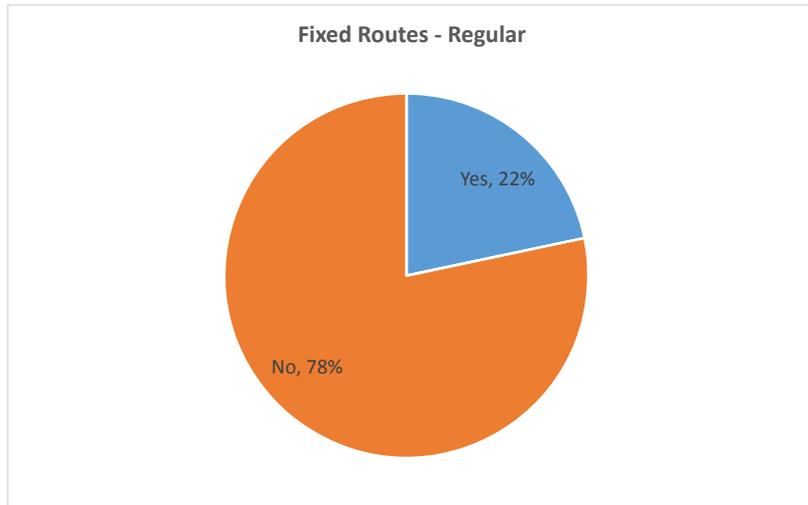
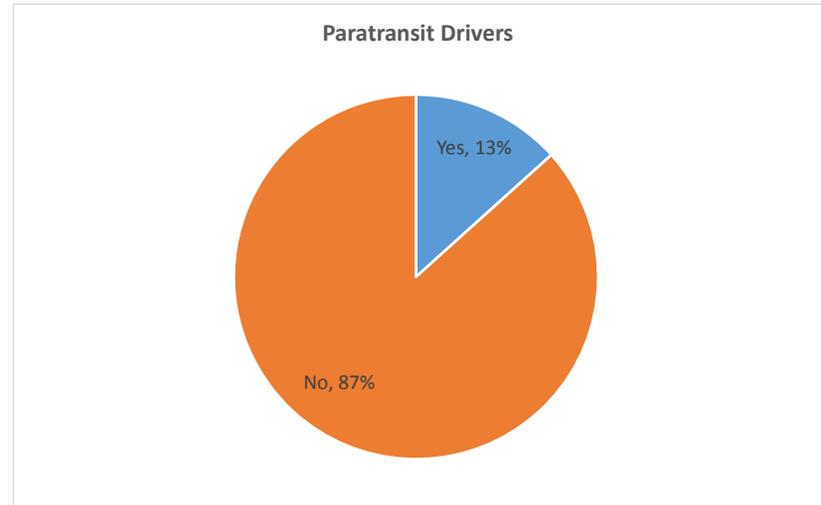
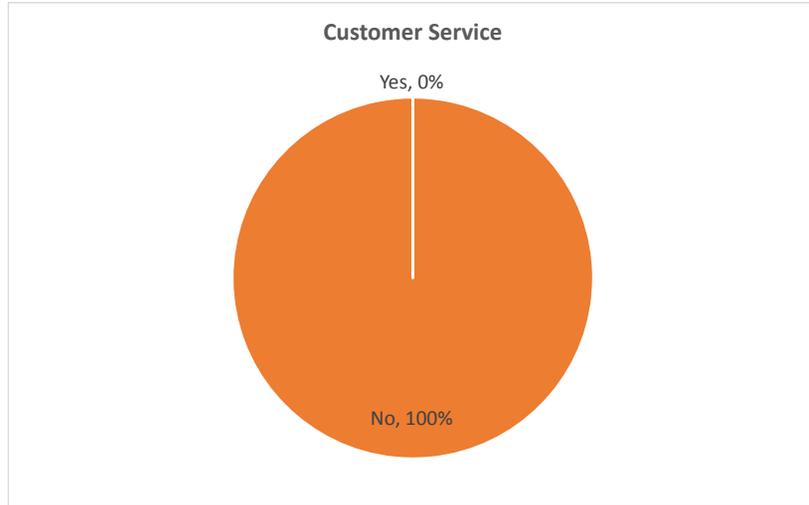
Fixed Routes - Express



8. Are you comfortable and qualified to interpret another language?



9. Are you comfortable and qualified to translate another language?



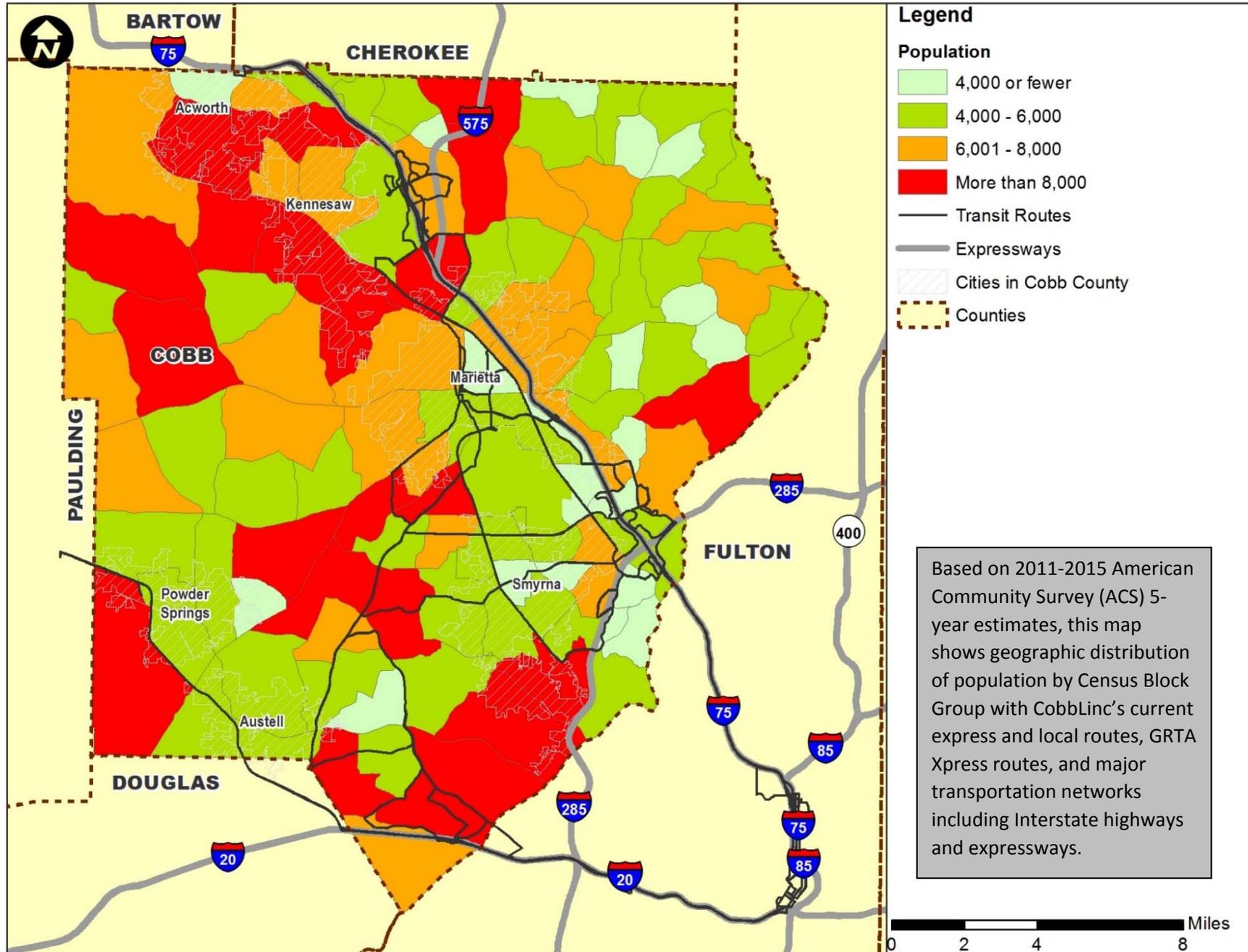


Appendix B

Demographic Maps

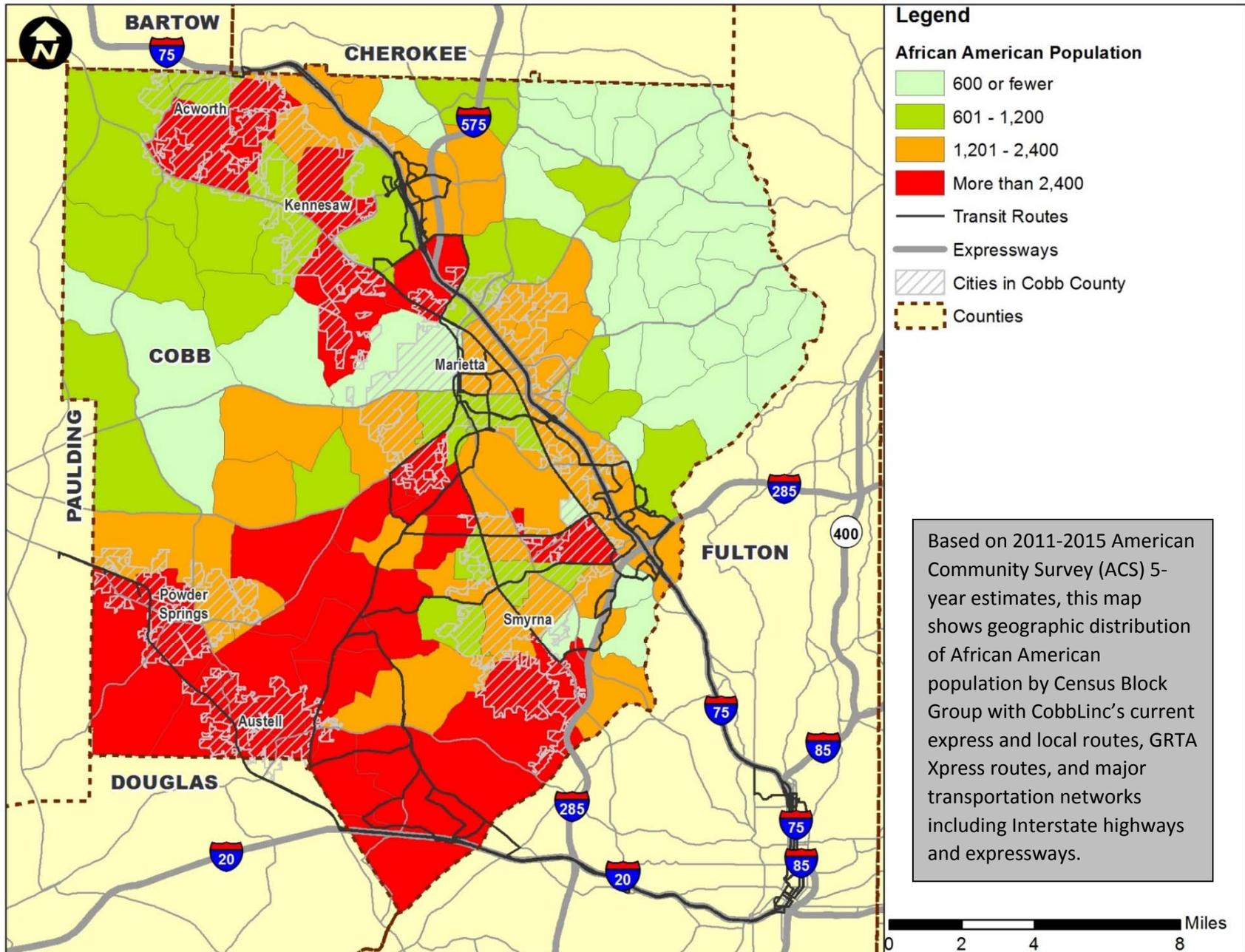
- Map – Distribution of Population in Cobb County
- Map – Distribution of African American Population in Cobb County
- Map – Distribution of Hispanic Population in Cobb County
- Map – Distribution of Low Income Population in Cobb County
- Map – Distribution of Percent White Only Population in Cobb County
- Map – Distribution of Percent Elderly Population in Cobb County
- Map – Activity Centers in Cobb County

Distribution of Population in Cobb County



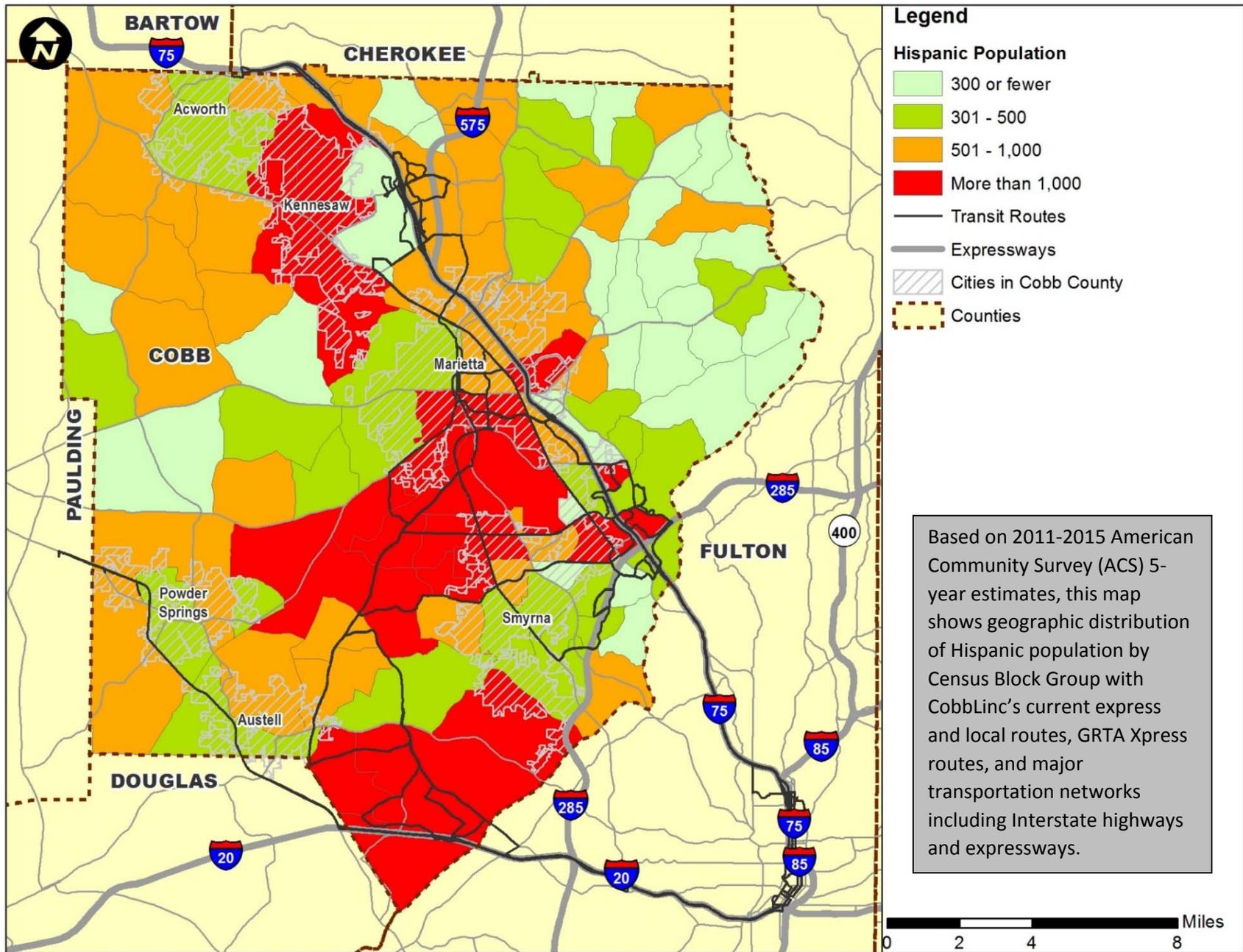
Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Distribution of African American Population in Cobb County



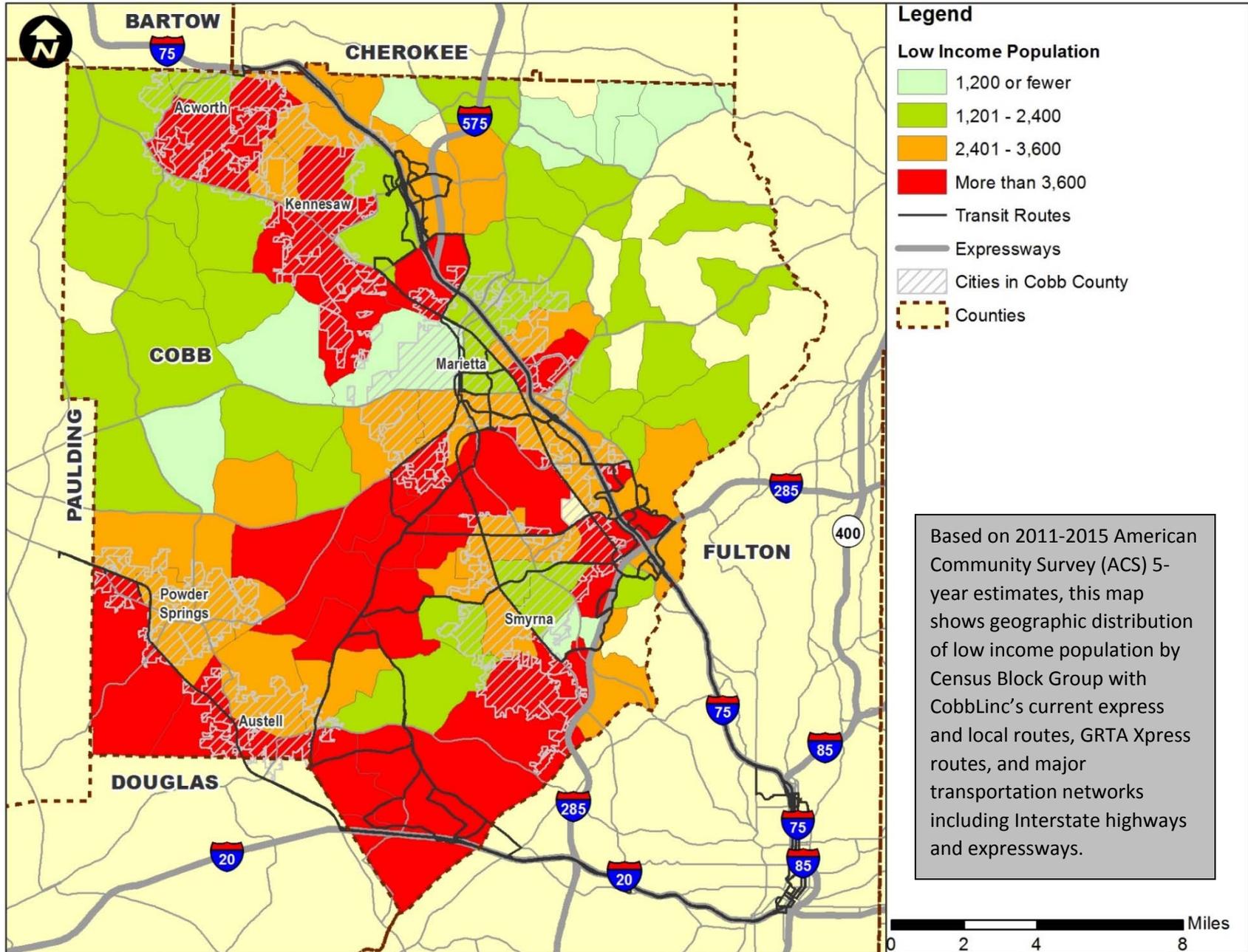
Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Distribution of Hispanic Population in Cobb County



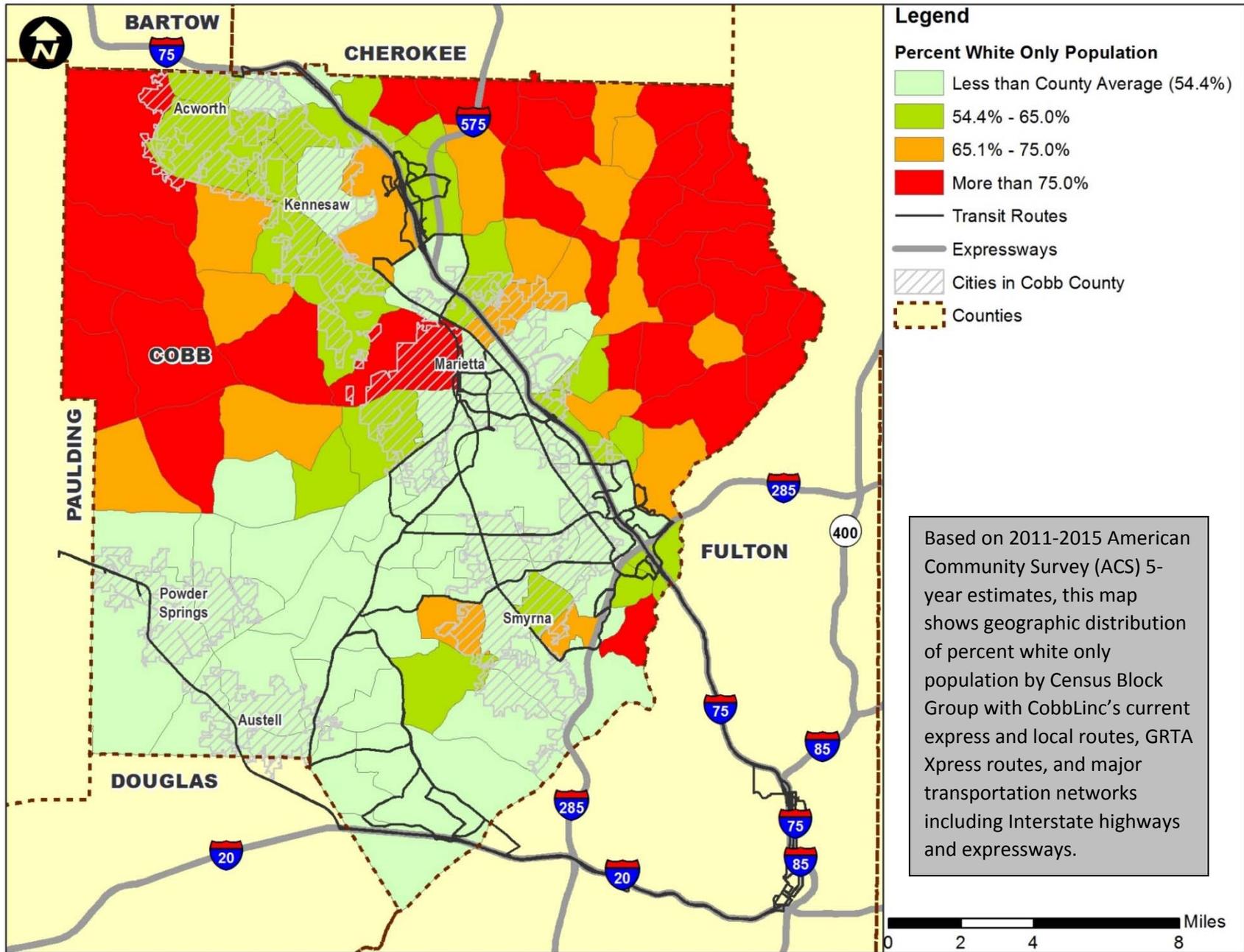
Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Distribution of Low Income Population in Cobb County



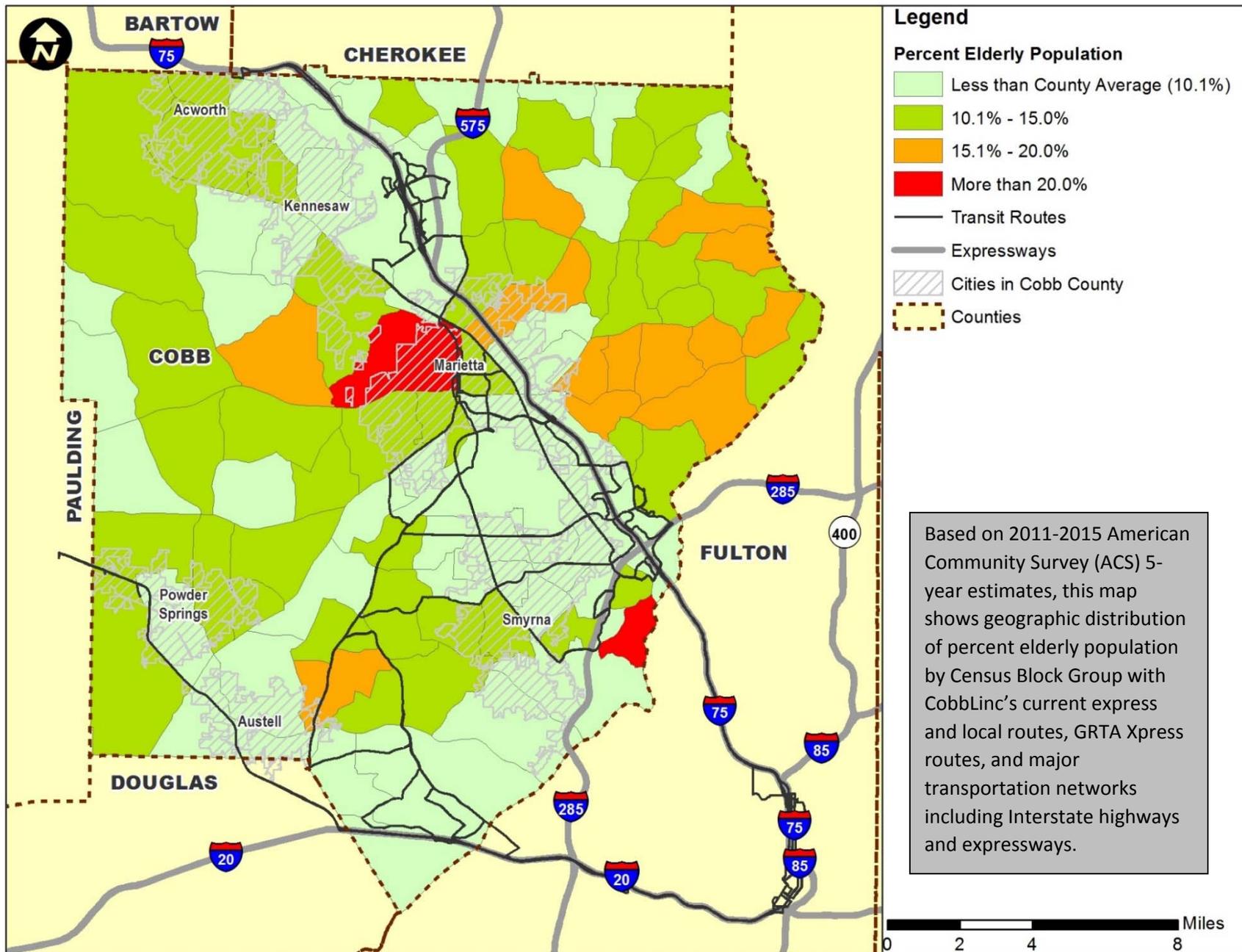
Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Distribution of Percent White Only Population in Cobb County



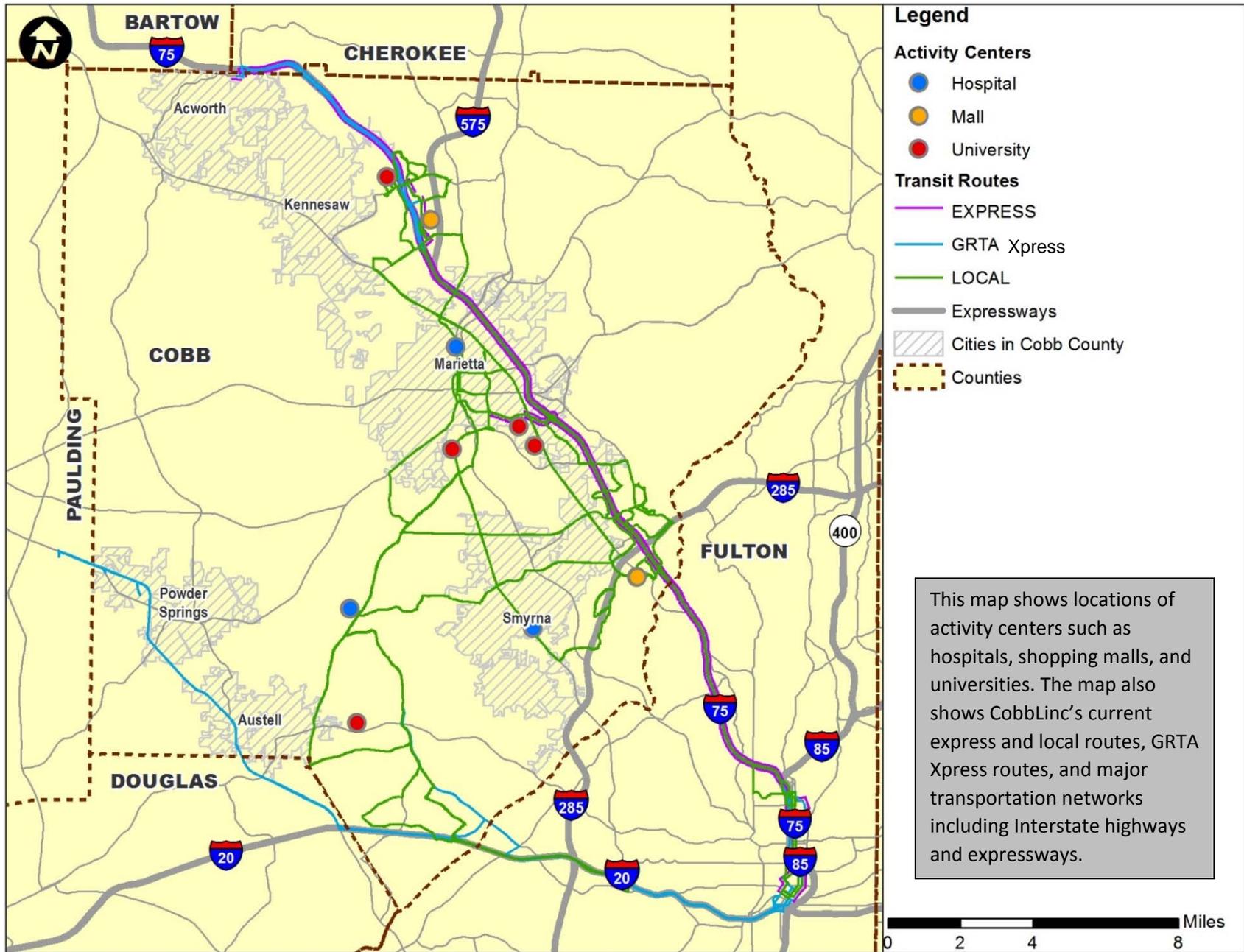
Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Distribution of Percent Elderly Population in Cobb County



Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Activity Centers in Cobb County



This map shows locations of activity centers such as hospitals, shopping malls, and universities. The map also shows CobbLinc's current express and local routes, GRTA Xpress routes, and major transportation networks including Interstate highways and expressways.

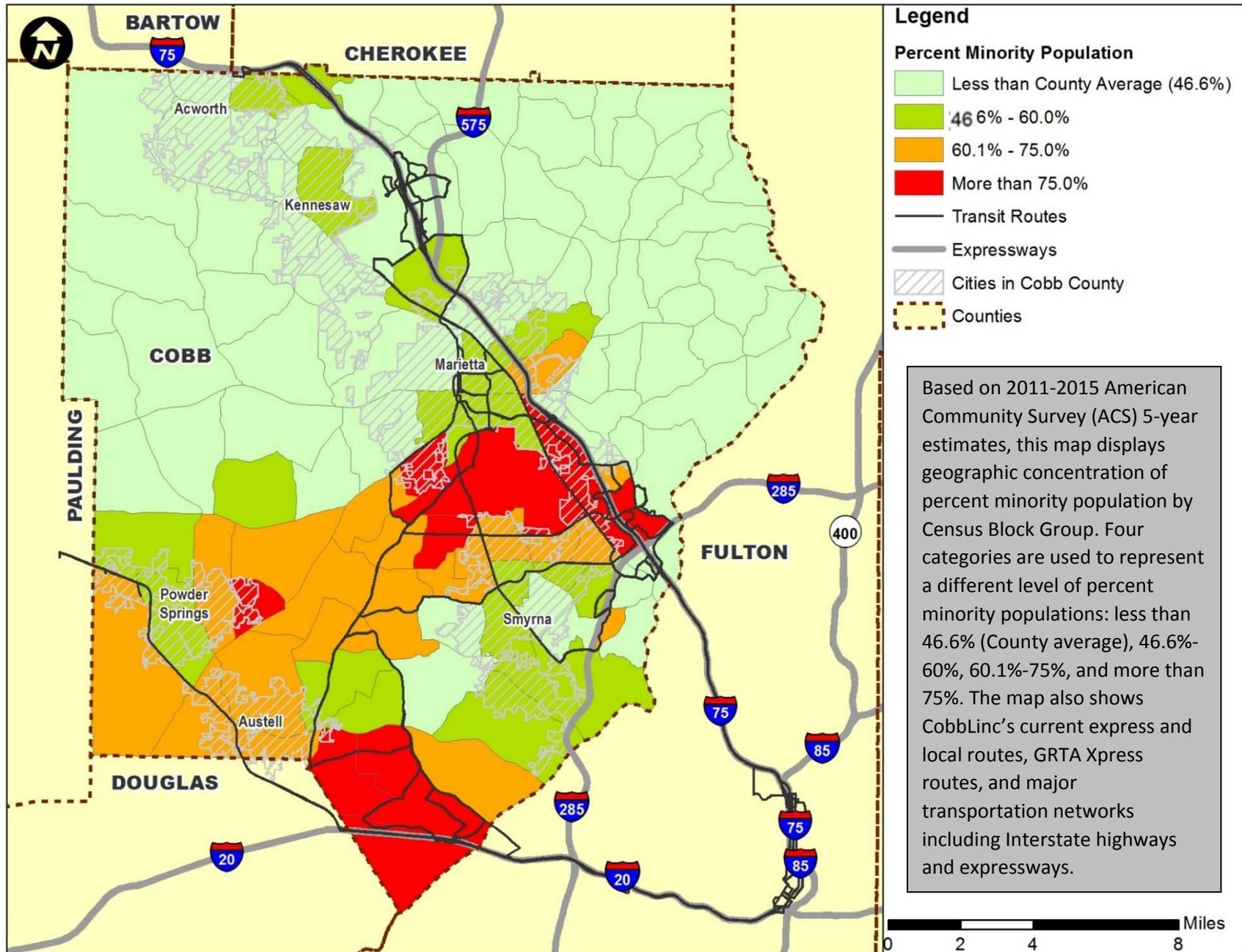


Appendix C

Environmental Justice (EJ) Maps

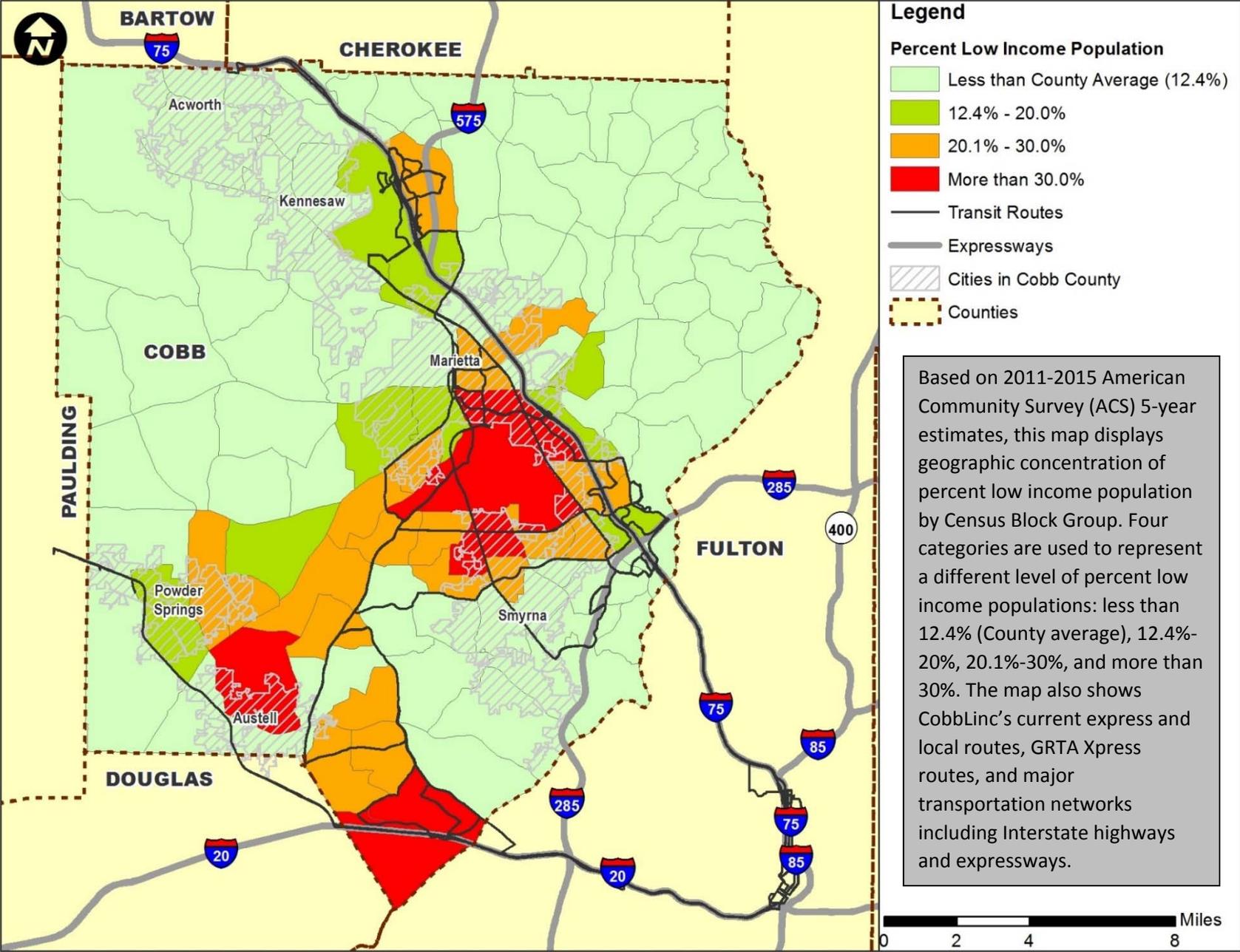
- Map – Environmental Justice Analysis: Concentration of Percent Minority Population
- Map – Environmental Justice Analysis: Concentration of Percent Low-Income Population
- Map – Environmental Justice Analysis: Concentration of Percent Limited English Proficient (LEP) Population

Environmental Justice Analysis: Concentration of Percent Minority Population



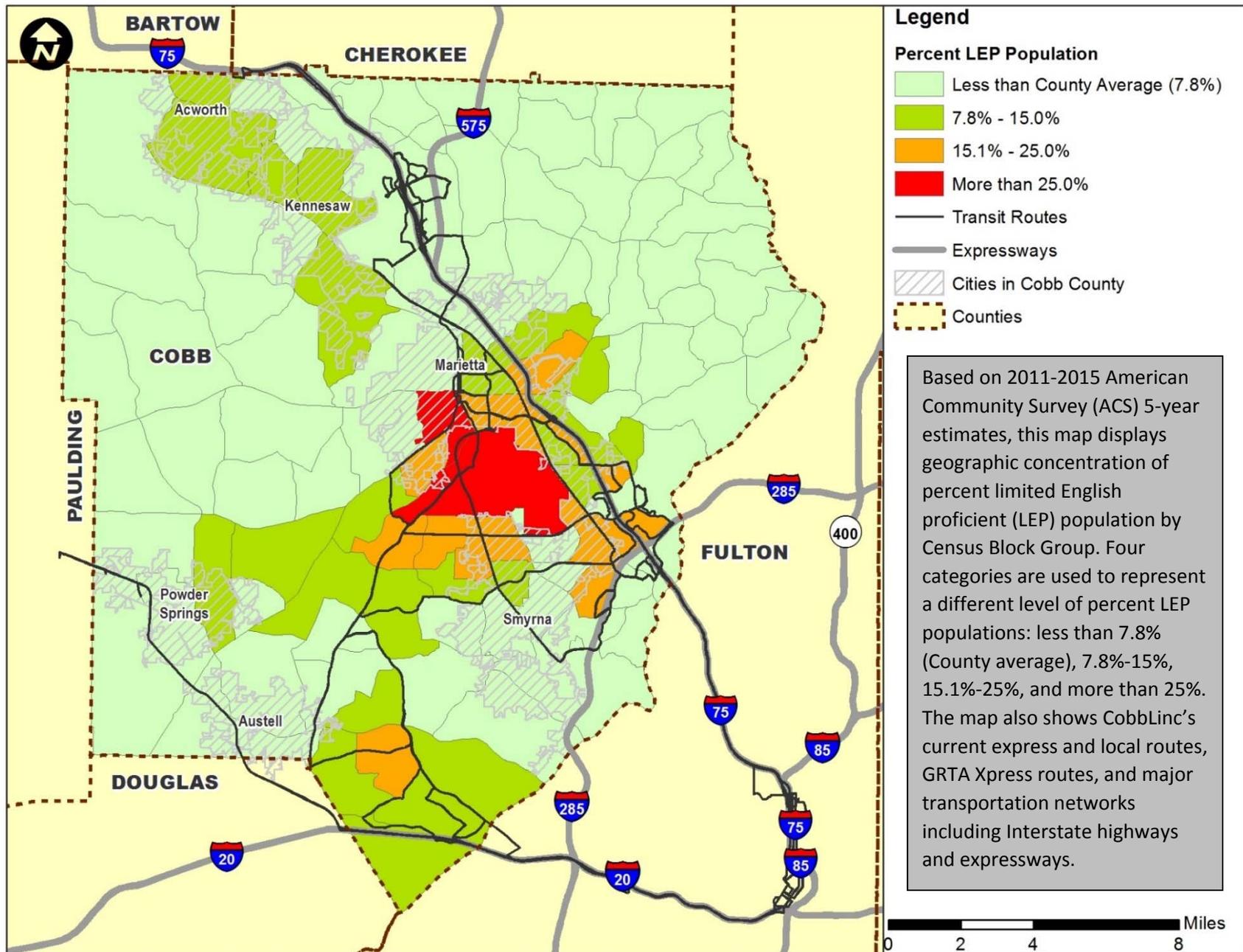
Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Environmental Justice Analysis: Concentration of Percent Low Income Population



Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates

Environmental Justice Analysis: Concentration of Percent LEP Population



Source: 2011-2015 American Community Survey (ACS) 5-Year Estimates