



# TITLE VI PLAN

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# Chatham Area Transit Authority Title VI Plan

## March 2016

### I. Policy Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Chatham Area Transit Authority (CAT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. This plan was developed to guide Chatham Area Transit Authority in its administration and management of Title VI-related activities.

### II. Title VI Mission

Our mission is to provide leadership and guidance to ensure nondiscrimination in CAT's transportation programs, activities and services, and to promote and engage the participation of all people regardless of race, color or national origin.

### III. Program Goals

Five Title VI goals for preventing discrimination in a Federal-Aid Program are:

#### Goal 1

Create, implement and maintain a Title VI Interdisciplinary Team. The Title VI Interdisciplinary Team is a coordinated and cooperative effort by functional programs and civil rights to ensure Title VI and related statute requirements are identified and considered in advance of any decision-making activity.

#### Goal 2

Create awareness of statutory non-discriminatory requirements. This goal is accomplished by disseminating statutes/regulations via a Title VI Resource Directory and educating staff through training and presentations.

#### Goal 3

Establish a systematic and ongoing public involvement process that engages communities affected by transportation projects.

## **Goal 4**

Identify potential discriminatory impacts early. Early detection can often minimize and reduce negative impacts to minority and low-income populations and delays to project delivery.

## **Goal 5**

Avoid, eliminate or mitigate adverse impacts. Transportation agencies may encounter some situations where negative impacts are unavoidable. In these situations, Transportation agencies must work with communities to develop mitigation measures to minimize impact.

CAT, as the recipient of Federal aid, established its Title VI Program goals to attain nondiscrimination in all of its operations.

Please refer to Terri Harrison, Title VI/EEO Officer who maintains the Civil Rights Title VI Program Plan and Annual Title VI Element Update by calling (912) 629-3909.

### **TITLE VI Officer Contact information**

Terri Harrison, CFO, Title VI/EEO Officer, 900 E. Gwinnett Street, Savannah, GA 31401, (912) 629-3909 or (912) 236-2111. Additional assistance can be received from the Compliance Coordinator – Programs who staffs CAT's Title VI Program and completes associated duties as directed by the Title VI/EEO Officer.

### **Title VI/EEO Officer and Coordinator Responsibilities**

The Title VI/EEO Officer, with assistance from the Compliance Coordinator – Programs, is charged with the responsibility for implementing, monitoring, and ensuring CAT's compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received by CAT.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of state highway programs, e.g., relocates, affected citizens, and impacted communities.
3. Conduct annual Title VI reviews of special emphasis program areas (right of way, planning, design, etc.) to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of sub-recipients and contractors.
5. Review CAT program directives in coordination with Middle Management Team and the Planning Coordinator for special emphasis program areas. Where applicable, include Title VI language and related requirements.
6. Conduct training programs on Title VI and other related statutes for employees and sub-recipients and contractors.
7. Prepare a yearly report of Title VI accomplishments and goals, as required.
8. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
9. Conduct post-grant approval reviews of CAT programs and applicants (e.g., design and relocation, and persons seeking contracts with the CAT), for compliance with Title VI requirements.

10. Identify and eliminate discrimination.
11. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.
12. Data Collection
13. Statistical data on race, color or national origin of participants in, and beneficiaries of federally funded program, (e.g., relocates, impacted citizens, and affected communities), will be gathered and maintained by the Title VI Coordinator. Each of the Title VI special emphasis program areas will maintain data to be incorporated in the Title VI Annual Update. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

#### **IV. Title VI Information Dissemination**

Title VI information notices (Appendix A) shall be prominently and publicly displayed in Chatham Area Transit Authority facility and on their revenue vehicles. The Title VI/EEO Officer is Terri Harrison, CFO and is also identified on Chatham Area Transit Authority website, at [www.catchacat.org](http://www.catchacat.org). Additional information relating to nondiscrimination obligation can be obtained from the Chatham Area Transit Authority Title VI/EEO Officer or the Compliance Coordinator - Programs.

Title VI information shall be disseminated to Chatham Area Transit Authority employees annually via distribution and discussion at an annual mandatory Safety Meeting, through website posting and through employee onboarding and annual training. These training materials remind employees of Chatham Area Transit Authority's policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and Chatham Area Transit Authority expectations to perform their duties accordingly. All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt.

#### **V. Limited English Proficiency (LEP)**

CAT is committed to ensuring that all of its programs and services are accessible to its LEP customers in compliance with Title VI. This includes, but is not limited to, providing internal and external resources for persons with limited English proficiency access to bilingual staff, interpreters, and translated materials and/or interpretation at meetings/events to ensure that information and services are made available in the languages readily understood by all CAT customers.

#### **Background of Limited English Proficiency (LEP) Plan**

On August 11, 2000, President William J. Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit or encounter. These individuals are referred to as being Limited English proficient, or "LEP".

Each Federal agency shall prepare a plan to improve access to its federally conducted Programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.-Executive Order 13166

Not only do all federal agencies have to develop LEP Plans as a condition of receiving federal financial assistance, but recipients of federal funds must comply with Title VI and LEP guidelines the federal agency from which funds are provided. Federal financial assistance include grants, training, use of equipment, donations of surplus property and other forms of financial contributions from federal sources. Recipients of federal funds range from state and local agencies, to nonprofits and other organizations.

Title VI covers a recipient's entire program and activity, which means all parts of recipients' operations are covered. This is true even if only one part of the recipients receive the federal assistance. Simply put, any organization that receives federal financial assistance is required to follow Executive Order 13166. The U.S. Department of Transportation published Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons in the Federal Register dated December 14, 2005. The guidance was issued to ensure that persons in the United States are not excluded from participation in DOT-assisted programs and activities simply because they face challenges communicating in English.

The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrator, airport operators, metropolitan planning organizations, and regional, state and local transit operators among many recipients' operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the Nation Highway System, all of the operations of the entire state department, all of the operations of the entire state highway on the National Highway, all of the operations of the entire state department of transportation – not just the particular highway program or project – are covered by the DOT guidance. US DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons.

### **Elements of an Effective LEP Policy**

The US Department of Justice, Civil Rights Division has developed a set of planning elements including:

1. Identifying LEP persons
2. Identifying ways in which language assistance will be provided.
3. Training staff;
4. Providing notice to LEP persons.

### **Determining Need**

CAT utilizes the four-factor analysis identified by the USDOT in determining what constitutes reasonable steps to ensure meaningful access.

### **The Four-Factor Analysis**

**Factor One** – the number and proportion of LEP persons in the eligible service area

- 2010, 2011 and 2012 Census Data

CAT serves the city of Savannah and portions of Chatham County. The Census' identified above has a range of four (4) classifications of how well people speak English. The classifications are 1) very well, 2) well, 3) not well, and 4) not at all. For transportation purposes, we consider people that speak English "not well" or "not at all" as Limited English Proficient (LEP) persons.

**Factor Two** – the frequency with which LEP persons come in contact with the program

CAT's key planning documents are the Long Range Transportation Plan (LRTP), the Transportation Improvement Program (TIP) and the Unified Planning Work Program (UPWP). The LEP population comprises of a large percentage of Chatham County's population who would use our services. A LEP survey conducted included 66 CAT employees who interacted with consumers on a regular basis. The results of the survey indicate a growing number of LEP riders who utilize CAT services. The results of the survey are summarized below.

- On average, contact with LEP persons utilizing CAT is significant. Approximately 60% of surveyed CAT employees reported contact with LEP persons.
- More than half (60.6%) of those surveyed reported at least one LEP person using CAT to commute daily.
- On an average day, CAT employees encounter approximately 258 LEP persons utilizing CAT's services. This accounts for approximately 2% of the total ridership on a daily basis based on 10,979 passengers per day.
- Spanish is the dominate LEP language group, representing 71% of the LEP persons encountered.
- Twenty of the 66 surveyed employees reported a request for translation assistance.

**Factor Three** – the nature and importance of the service provided by the program

The census shows that the largest population gains for Chatham County, comes from the Hispanic and Asian communities. Transportation services and planning affects LEP populations throughout all of our processes and in particular during special transportation studies and regular updates of the LRTP and TIP. The transportation planning of services and the financial decisions carried out by CAT, definitely impact the mobility and access of LEP populations. CAT's transportation planning process participation offers opportunities for LEP persons in the form of public comment on the revisions made to schedules (newly created, modified or eliminated services) and how funds are appropriated to service Chatham County. CAT strives to meet the needs of its client base to make sure that all segments of the population, including LEP persons, have the opportunity to be provided public transit. CAT understands the importance of public transportation to it citizens and companies needing to fulfill their employee needs.

**Factor Four** –resources available and overall cost

- Funding for developing and carrying out the LEP requirements comes from the our MPO through Section 5303.
- CAT's website provides information regarding all services and compliance with Title VI. Individuals may select from a choice of 67 different languages to view
- CAT also works intricately with the CORE Metropolitan Planning Organization (MPO) to pool all available staff resources together to better serve the LEP persons in the Savannah area. The existing resources include:
  - Bi-lingual staff members in Spanish can help translate the functional areas from English to the appropriate languages as needed, to facilitate understanding the services and programs available to them.
  - Should the services of a Chinese individual need language assistance, we have a viable relationship with the MPO who has staff that are willing to translate on our behalf.
- CAT has a bilingual Call Center, Transit Ambassador and will continue to pursue hiring bilingual staff.
- Additionally, two (2) English speaking Transit Ambassadors were provided Business Spanish to customer queries in Spanish.
- Transportation information can be provided in various formats written and electronically and where appropriate, audiotape and large font formats are available upon request.
- CAT staff have identified and initiated dialogue with some community organizations (Hispanic and Latino organizations, Hispanic, Latino and Chinese churches, etc.) where LEP persons congregate in order to facilitate their attendance at public meetings. They also assist in publicizing meeting notices, flyers and other distributed materials.
- The MPO's SAGIS Department and the Graphics Department helps to provide GIS analysis related to LEP and to make easier to understand ride guides, graphics, maps and charts.
- The Advisory Committee on Accessible Transportation (ACAT) provides input into transportation planning and transit services.
- CAT also has an advisory council who offers suggestions and/or observations about transit service. It is comprised of a former member of the CAT board, two frequent users of public transportation, a member of Living Independence for Everyone (LIFE) representing the disabled community and a representative of the Latin American Services Organization (LASO) representing the Latino community.
- Title VI Notice is posted on all buses in English and Spanish.
- CAT has published advertisements promoting transit in the leading Spanish-speaking newspaper, La Voz. Spanish-speaking customers can call CAT's phone number to get transit information in Spanish.

## English Proficiency (LEP)

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Chatham Area Transit Authority (CAT) is responsible for ensuring that all persons, including persons with Limited English Proficiency (LEP) are provided equal access to its available services and information. CAT is committed to ensuring that all of its programs and services are accessible to its LEP customers in compliance with Title VI. This includes, but is not limited to, providing resources, including bilingual staff, interpreters, and translated materials to ensure that information and services will be made available in the languages readily understood by all CAT customers.

Contact: Valerie Ragland  
Limited English Proficiency Specialist  
Chatham Area Transit Authority  
900 E. Gwinnett Street  
Savannah, GA 31401  
Telephone: (912) 629-3924 or (912) 236-2111

### **Safe Harbor Stipulation**

Federal law provides a “Safe Harbor” stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A “Safe Harbor” means that if a recipient provides written translations (as under circumstances outlined in paragraphs A and B of the publication (Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons) such action will be considered strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

Strong evidence of compliance with the recipient’s written-translation obligations under “Safe Harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected of encounter. Translation of other documents, if needed, can be provided orally. The failure to provide written translations under the circumstances does not mean there is non-compliance, but rather provides a guide for recipients that would like greater certainty of compliance that can be provided by a fact-intensive, four-factor analysis. For example, even if a Safe Harbor is not used, if written translation of certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways to providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. This Safe Harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable.

### **VI. New Compliance Requirements**

Federal Transit Administration introduced new compliance requirements associated with FTA Circular 4702.1A which requires that under Title VI of the Civil Rights Acts of 1964, Chatham Area Transit Authority (CAT) has existing policies that are currently in use as well as crafting policies to meet the new compliance requirements to evaluate system-wide service changes

and proposed improvements at the planning stages to determine whether those changes have a discriminatory impact on minority and low income populations. CAT is in the process of taking the proposed policies to the public and the governing board for the approval of the new policies. CAT takes the approach of combining its own methodology combination of on-board customer survey data, ridership counts, and Census-derived demographic data to assess the effects of service change on minority and low-income populations.

The definition used for the CAT's Title VI Analysis defined by FTA is a minority defined as American Indian, Asian, African American, Hispanic, and Native Hawaiian. The definition of classified poverty is defined by 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 2012. U.S. Census and American Community Survey (ACS), which form the basis of this review. Based on data from DHHS in 2013 is 1 person/\$11,490 annually and 2 persons/\$15,510 annually and 3 persons/\$19,530.

## **VII. Major Service Change Policy**

All major service changes as specified by CAT in coordination with FTA are subject to a Title VI Equity Analysis prior to Board approval of the service change. CAT completes an equity analysis for a major service change and present to the public in the form of public meetings and to the CAT Board of Directors for its consideration and included in the Title VI program with a record of action taken by the Board.

A major service change is defined by CAT as: route elimination, new route creation, change of a route in which is 25% or more revenue miles are adjusted to a different route. In addition, anytime there is a 25% or greater change in revenue hours and/or revenue miles, 25% or greater reduction in span of service or fare change all of which will constitute a major service change.

## **VIII. Disproportionate Burden Policy**

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations.

The threshold is the difference between the burdens borne on low-income populations compared to non-low income populations. Exceeding the threshold means that a fare or service change either negatively impacts low-income populations' more than non-low-income populations or that the change benefits non-low-income populations more than low-income populations.

If the threshold is exceeded, CAT evaluates whether there is an alternative that has a more equitable impact.

## **IX. Disparate Impact Policy**

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations.

The threshold is the difference between the burdens borne on minority populations compared to non-minority populations. Exceeding the threshold means that a fare or service change either negatively impacts minority populations more than non-minority populations or that the change benefits non-minority populations more than minority populations.

## **X. Evaluation Methodology**

A geographic information systems (GIS)-based approach was employed in this analysis to measure the location and magnitude of service changes and compare minority/non-minority and low-income/non-low-income populations for distribution of impacts and benefits. CAT used census tracts to examine the demographics of every route in the service area, and compared the low-income and minority populations. The additional processes were to :

- Spatially allocate current and proposed transit service levels to population groups based on intersection between service buffer and census tract.
- Calculate the percent difference in current versus proposed service levels for each census tract.
- Calculate the average percent change in service for all minority/low-income and non-minority/non-low-income populations within one-quarter mile of the current and proposed transit service.

Information on minority populations is available at the census tract level. The information regarding on low-income populations is available at the traffic analysis zone (TAZ) level. Census tracts are made up of several blocks.

To estimate the low-income populations at the TAZ, the total population of each was divided by total of households occupied to determine the persons per household. The persons per household were then divided by the median income of the TAZ. The amount was the income per person per zone. This approach assumes that the percentage of low-income population is uniform throughout the TAZ. In addition, the poverty level per from DHHS helped to identify both poverty and low-income population is uniform throughout the TAZ.

The methodology developed to analyze the impact of the minority and low-income populations included the following steps, several of which are discussed in more detail below:

Defining the term poverty low income to mean those with a reported annual household income below \$11,490 per person is considered poverty and income from \$12,000- \$20,000 is considered low income per person.

Defining the term “minority” to mean those who self identified as any ethnicity other than “white” alone.

Analyzing data from the 2013 CAT system-wide onboard customer survey for low income and minority populations to determine current ridership patterns.

## **XI. Monitoring Procedures**

Periodic service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision making is equitable service. Monitoring shall be conducted at minimum once every three years. If the result of monitoring determines that prior decisions have resulted in disparate impacts, corrective action(s) shall be taken to remedy the disparities. The following service monitoring procedure shall be used:

### **Quality of Service Methodology.**

- (1) The Authority shall identify an appropriate number of Census tracts that represent a cross-section of the Savannah/Chatham County population. A portion of this sample will include Census tracts with minority and/or low-income residents and will predominately identify the most frequently traveled destinations for riders using the service.
- (2) For each of the three most frequently traveled destinations, a comparison of the average peak hour travel time to destination, average non-peak hour travel time to destination, number of transfers required to reach the destination, total cost of trip to the destination, and cost per mile of trip to the destination for people beginning the trip in the selected Census tracts.
- (4) If disparities exist in any of these factors along the trips to any of the destinations analyzed, a determination shall be made define whether the differences are significant.
- (5) If significant disparities in one or more quality of service indicators have been confirmed, a determination shall be made regarding why the disparity exists and corrective action to correct the disparity.

## **XII. Subcontracts and Vendors**

All subcontractors and vendors who receive payments from Chatham Area Transit Authority where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

## **XIII. Subrecipients**

CAT does not have subrecipients.

## **XIV. Record Keeping:**

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of Chatham Area Transit Authority Title VI Plan, copies of Title VI complaints or lawsuits and

related documentation, and records of correspondence to and from complainants, and Title VI investigations.

## **XV. Title VI Complaint Procedure**

Chatham Area Transit's (CAT) Title VI Complaint Procedure outlines a process for Title VI complaints and is consistent with guidelines found in the Federal Transit Administration 49 CFR Section 21.9(b) for CAT and its sub-recipients. The purpose of 49 CFR Section 21.9(b) is to ensure that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations," and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries..

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color or national origin by a recipient of Federal Transit Administration (FTA) funding can file a Title VI of the Civil Rights Act of 1964 written complaint with Chatham Area Transit Authority, 900 E. Gwinnett Street, Savannah, GA 31401. Complaints may be submitted on the basis of intentional discrimination or on the basis of disparate impact discrimination, where a neutral policy or practice has the effect of disproportionately excluding or adversely affecting minority beneficiaries or other protected individuals and the recipient's practice lacks a substantial legitimate justification.

The complaint procedure has five steps, outlined below:

1. **Submission of 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 or national origin has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through CAT may file a written complaint with the Title VI Coordinator. Such complaint must be filed within 180 calendar days after the date the person believes the discrimination occurred.
2. **Referral to Review Coordinator:** Upon receipt of the Complaint, the Title VI Coordinator shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the Complaint, in consultation with the CEO/Executive Director. The staff review coordinator(s) shall complete their review no later than 45 calendar days after the date CAT received the Complaint. If more time is required, the Title VI Coordinator shall notify the Complainant of the estimated time-frame for completing the review. Upon completion of the review, the staff review coordinator(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review coordinator(s) may recommend improvements to CAT's processes relative to Title VI and environmental justice, as appropriate. The staff review coordinator(s) shall forward their recommendations to the CEO/Executive Director, for concurrence. If the CEO/Executive Director concurs, he shall issue CAT's written response to the Complainant.
3. **Request for Reconsideration:** If the Complainant disagrees with the Title VI Coordinator's response, he or she may request reconsideration by submitting the request, in writing, to the CEO/Executive Director within 10 calendar days after receipt of the Title VI Coordinator's response. The request for reconsideration shall be

sufficiently detailed to contain any items the Complainant feels were not fully understood by the Title VI Coordinator. The CEO/Executive Director will notify the Complainant of his decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the CEO/Executive Director agrees to reconsider, the matter shall be returned to the staff review coordinator(s) to re-evaluate in accordance with Paragraph 2, above.

4. Appeal: If the request for reconsideration is denied, the Complainant may appeal the CEO/Executive Director's response to the Complaint by submitting a written appeal to CAT's CEO/Executive Team no later than 10 calendar days after receipt of the Executive Director's written decision rejecting reconsideration.
5. Submission of Complaint to the Federal Transit Administration: If the Complainant is dissatisfied with CAT's Executive Team's resolution of the Complaint, he or she may also submit a complaint to the Federal Transit Administration (FTA) Office of Civil Rights for investigation. In accordance with Chapter IX, Complaints, of FTA Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the date of the alleged discrimination unless the time for filing is extended by the FTA. Chapter IX of the FTA Circular 4702.1A, which outlines the complaint process to the Federal Transit Administration, may be obtained by requesting a copy from CAT's Title VI Coordinator at (912) 629-3912 or Cedric.Dumas@catchacat.org.
6. Tracking/Monitoring Complaints: All Title VI complaints will be entered into CAT's Customer Complaint system by the Title VI/EEO Officer or the Compliance Coordinator - Programs. Complaints shall be monitored on a quarterly basis to determine compliance with Title VI.

### **Have Your Rights Been Violated?**

If your answer is yes, you have a right to file a formal complaint in writing. Send your complaint to:

Terri Harrison, Title VI/EEO Officer  
Chatham Area Transit Authority  
900 E. Gwinnett Street  
Savannah, GA 31401

(912) 629-3909 or CAT at (912) 236-2111

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For individuals with Limited English Proficiency and sensory disabilities, this information is available in various languages, Braille, large print, on audio-cassette, or computer disk. To obtain a copy in one of these alternate formats, please call or write to the System Development Department, Chatham Area Transit Authority, 900 E. Gwinnett Street, Savannah, GA 31401, (912) 629-3924 or (912) 236-2111, FAX (912) 944-6058.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights

Attention: Title VI Program Coordinator  
 230 Peachtree, NW  
 Suite 800  
 Atlanta, GA 30303  
 Telephone (404) 865-5600  
 Fax (404) 865-5605

**XVI. Title VI Investigations, Complaints and Lawsuits**

In accordance with 49 CFR, CAT must record and report any investigations, complaints or lawsuits involving allegations of discrimination. The records of these events shall include the date of the investigation, lawsuit or complaint. The records for the previous three years shall be included in the Title VI Plan when submitted to FTA.

CAT has had no investigations, complaints or lawsuits involving allegations of discrimination on the basis of race, color or national origin over the past three years. The format to summarize these incidents is shown in the following table:

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color or national origin)	<b>Status</b>	<b>Action(s)Taken</b>
<b>Investigations</b>	None	N/A	N/A	N/A
1.				
2.				
<b>Lawsuits</b>	None	N/A	N/A	N/A
1.				
2.				
<b>Complaints</b>	None	N/A	N/A	N/A
1.				
2.				

**XVII. Limited English Proficiency (LEP) Plan**

Chatham Area Transit has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to CAT 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 Cat’s extent of obligation to provide LEP services, CAT 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 CAT service area who maybe served or likely to encounter an CAT program, activity, or service; 2) the frequency with which LEP individuals come in contact with an CAT service; 3) the nature and importance of the program, activity or

service provided by the CAT to the LEP population; and 4) the resources available to CAT and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## **XVIII. Community Outreach**

As an agency receiving federal financial assistance, we have and will continue the following community outreach efforts:

Chatham Area Transit Authority engages the public in its planning and decision-making processes, as well as its marketing and outreach activities. We have employed a firm to study to explore possible service expansion through the possible coordination with other public transit agencies, review of funding options, and sustainability of service. The public is always invited to participate in the process whether through public meetings, completion of surveys or providing comments by telephone, postal mail or e-mail.

### **Public Meetings**

When new service is proposed it is taken before the Local Citizen's Advisory Committee and the CAT Board of Directors to discuss the feasibility of extending service. All are welcome to attend the meeting. Meetings are scheduled once a year unless otherwise needed. Additionally, CAT participates with the MPC in looking at coordinating services.

### **Minority Representation on Decision-making Bodies.**

Balanced membership is always encouraged on any transit-related non-elected boards, advisory councils or committees which are integral parts of CAT's planning process, implementation of programs and other related activities.

- The Chatham Area Transit Authority Board is composed of nine elected county commissioners and four citizen appointees, one of whom is from the disabled community. Of the nine county commissioners, five are white males, one is a white female, one is a black female, and two are black males. Of the additional non-elected four citizen appointees, one is a black male and three are white males (one of whom is disabled).
- The Georgia and the United States Departments of Transportation are obligated to provide the necessary funding as well as keeping the Metropolitan Planning Organization (MPO), i.e., CUTS, informed of their policies and requirements; for furnishing copies of their plans and programs which affect the area; and for furnishing technical assistance and data to the planning process. The MPO is responsible for executing all transportation study contracts and managing, directing, and controlling the study. The MPO is also responsible for coordinating transportation with other planning policies and programs. In addition to the sponsoring agencies, the CUTS process consists of three principal committees and supported by the staff members of the Georgia Department of Transportation and the Metropolitan Planning Commission. The Policy Committee provides guidance at the policy-making level. The membership of the Policy Committee consists of the top elected and appointed officials and/or executives of local state, and federal agencies concerned with transportation planning. This committee has the primary responsibility for formulating transportation-related policies in support of the area's goals and objectives. The Policy Committee also has the responsibility of prioritizing the transportation improvement projects resulting from the planning process. It annually reviews the progress of the projects and ensures that they are implemented on schedule.

Additional projects are added periodically to maintain project planning schedules for a three and a six-year period. The Policy Committee also serves as the liaison between the study and the various governmental units involved in the program.

The **Advisory Committee on Accessible Transportation (ACAT)** serves as the forum for cooperative decision-making with regard to accessible transportation related issues in Chatham County. ACAT acts as a liaison between the transportation planning process and the traditionally underserved communities in Chatham County (i.e., those communities with high concentrations of minority, low-income, disabled and elderly populations). ACAT advises the MPO as well as the Chatham Area Transit Authority and the Savannah-Chatham Council on Disability Issues on accessible transportation related issues. ACAT ensures that the transportation planning process is current and responsive to all applicable laws, rules and regulations, especially, but not limited to, the following: Americans with Disabilities Act of 1990 (ADA); Executive Order 12898 (environmental justice); Section 504 of the Rehabilitation Act of 1973, as amended; Older Americans Act of 1965, as amended; and Title VI of the Civil Rights Act of 1964, as amended. ACAT strives to ensure that the full panoply of transportation options is available to citizens with disabilities and the traditionally underserved.

**Advisory Committee on Accessible Transportation Voting Members:**

- Chatham Area Transit Authority (CAT)
- Chatham County, Staff Representative
- Chatham County-Savannah Metropolitan Planning Commission (MPC)
- Coastal Center for Development Services
- Economic Opportunity Authority for Savannah - Chatham County Inc.
- Georgia Department of Transportation (GDOT)
- Georgia Infirmity Day Center for Rehabilitation
- Goodwill Industries of the Coastal Empire
- Housing Authority of Savannah
- Interested Citizen (3)
- Kicklighter Resource Center
- Living Independence for Everyone (LIFE) Inc.
- National Association for the Advancement of Colored People (NAACP)
- National Federation of the Blind of Georgia
- Savannah Center for the Blind and Low Vision
- Savannah-Chatham County Council on Disability Issues (SCCDI)
- Savannah-Chatham County Fair Housing Council
- Savannah Council of the Blind
- Senior Citizens Savannah - Chatham County Inc.

The **Citizens Advisory Committee (CAC)** is representative of a cross-section of the community and functions as a public information and involvement committee. It reviews all CUTS programs and studies and provides recommendations to MPO. The CAC is entrusted with informing the MPO of the community's perspective while providing information to the community about transportation policies and issues. There are 30 CAC members. Public officials in Chatham County and each of the municipalities appoint members for two-year terms. The Citizens Advisory Committee (CAC) is responsible for advising the Policy Committee on matters of public opinion concerning study findings and recommendations. Its duties include: providing a forum to obtain public views on

transportation issues and problems, reviewing transportation reports and recommendations to ensure that local goals are considered, and directing issues of public concern to the attention of the Policy or Technical Coordinating Committee. The membership of the Citizens Advisory Committee consists of thirty members appointed by the elected officials from throughout the county. They are appointed to two-year terms on a fiscal year basis.

**Citizens Advisory Committee Voting Members:**

- Bloomingdale
- Chatham County (3)
- Garden City
- Pooler
- Port Wentworth
- City of Savannah (5)
- Thunderbolt
- Tybee Island
- Vernonburg
- Effingham County

All of the CUTS committee meetings are open to the public and interested citizens are encouraged to attend. At each meeting, the public is provided with an opportunity to address the committee on any issue related to the transportation planning process. Anyone wishing to speak can sign up at the beginning of the meeting or contact CUTS staff prior to the meeting. In addition, the public is permitted to engage in the discussion of all action items on the agenda prior to the formal vote. Public discussion during informational items is encouraged when time permits, at the discretion of the committee chairs.

The Technical Coordinating Committee (TCC) is made up of key government and agency transportation staff members who are involved in technical aspects of transportation planning. The TCC reviews and evaluates all transportation studies and provides technical guidance and direction to the MPO. The TCC is comprised of technical staff members from local, state and federal agencies concerned with transportation planning.

**Technical Coordinating Committee Voting Members:**

- Chatham County
- City of Savannah
- City of Garden city
- City of Pooler
- City of Bloomingdale
- City of Port Wentworth
- City of Tybee Island
- Town of Thunderbolt
- Town of Vernonburg
- Georgia DOT
- Chatham Area Transit Authority (CAT)
- Georgia Ports Authority (GPA)
- Savannah Airport Commission

- CSX Transportation
- Norfolk Southern Railroad
- Trucking Industry
- Metropolitan Planning Commission (MPC)
- Savannah Economic Development Authority (SEDA)
- Savannah Area Chamber of Commerce
- Hunter Army Airfield
- CORE MPO Citizens Advisory Committee (CAC)
- CORE MPO Advisory Committee on Accessible Transportation (ACAT)
- Bicycle Advocacy Group

**MPO Voting Members:**

- Chatham County
  - City of Savannah
  - City of Garden City
  - City of Pooler
  - City of Bloomingdale
  - City of Port Wentworth
  - City of Tybee Island
  - Town of Thunderbolt
  - Town of Vernonburg
  - Georgia DOT
  - Chatham Area Transit Authority (CAT)
  - Georgia Ports Authority (GPA)
  - Savannah Airport Commission
  - Metropolitan Planning Commission (MPC)
  - Savannah Economic Development Authority (SEDA)
  - Savannah Area Chamber of Commerce
  - Hunter Army Airfield
  - CORE MPO Citizens Advisory Committee (CAC)
  - CORE MPO Advisory Committee on Accessible Transportation (ACAT)
- Transit-related information is available in Spanish and posted on all buses. This information includes fares, half-fare policies and where to apply for a CAT half-fare identification card, and courtesy rules for riding the bus.
  - CAT has published advertisements promoting transit in the leading Spanish-speaking newspaper, La Voz. To be printed in La Voz is a CAT ad with verbiage inviting Spanish-speaking customers to call CAT's phone number to get transit information in Spanish.
  - CAT has a recording in Spanish available 24 hours each day that gives basic information on the transit system. Callers are prompted in Spanish to access this translated information.
  - A Spanish speaking Transit Ambassador is available to provide schedule and route information and other Transit Ambassadors have received training in Business Spanish to assist in responding to customer queries in Spanish.
    - a. CAT works with the Latin American Services Organization (LASO), a local Latino advocacy group, on outreach into the growing Latino population. LASO provides Spanish-speaking interpreters.
    - b. Provide a narrative documenting implementation of the Title VI internal review

process for at least one service delivery or capital program decision that was implemented during the past three years. See Appendix K.



## **Notice to Public**

**Title VI of the Civil Rights Act of 1964** prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance (42 U.S.C. Section 2000d).

CAT is committed to practicing non-discrimination. If you believe you have been subjected to discrimination, you may file a complaint with the CORE MPO's Title VI Coordinator.

For more information visit us on the website at [www.thempc.org](http://www.thempc.org) or call 912-651-1446.

## **Aviso Publico**

**El Título VI de la Ley de los Derechos Civiles de 1964** es una ley federal que protege a los individuos contra la discriminación basada en raza, color o nacionalidad, en los programas que reciben asistencia financiera federal. (42 U.S.C. Sección 2000d).

CORE MPO esta enfocada en garantizar que nadie sea discriminado(a). Si usted cree que ha sido discriminado(a), puede presentar una queja a CORE MPO.

Para mas detalles visita la pagina de internet [www.thempc.org](http://www.thempc.org) o comuniquese al telefono (912) 651-1446.

# Appendix A



## **NOTICE OF TITLE VI PROVISIONS**

Title VI of the Civil Rights Act of 1964, related statutes and regulations provide that no person shall on the ground of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving Federal funds, whether schools, colleges, government entities, or private employers must comply with Federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

It is the responsibility of Chatham Area Transit Authority (CAT) to ensure that this project is performed without discrimination, under Title VI.

**If you feel you are being denied participation in this project, being denied benefits of this program, or otherwise being discriminated against because of your race, color or national origin, you may contact:**

**Terri Harrison, CFO  
Title VI/EEO Officer  
Chatham Area Transit Authority  
900 E. Gwinnett Street  
Savannah, GA 31401  
(912) 629-3909**

To file a complaint, please contact CAT's Title VI/EEO Officer by phone at 912-629-3909 or email at [terri.harrison@catchacat.org](mailto:terri.harrison@catchacat.org). Additionally, complaint forms and instructions are available on our website at [catchacat.org](http://catchacat.org), can be completed and mailed to our Title VI/EEO Officer, 900 E. Gwinnett Street, Savannah, GA 31401.

**YOU SHOULD CONTACT THE ABOVE INDIVIDUAL OR ANY CAT OFFICE AS SOON AS POSSIBLE BUT NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION OCCURRED, OR IF THERE HAS BEEN A CONTINUING COURSE OF CONDUCT, NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION WAS DISCONTINUED.**

# Appendix B



CHATHAM AREA TRANSIT

## DISCRIMINATION COMPLAINT FORM TITLE VI AND RELATED STATUTES

### Contact Information

Name:

Address:

City:

State:

Zip:

Home Phone:

Work Phone:

Email:

### Discrimination Complaint

Name of Staff Person(s) that You Believe Discriminated Against You:

Date of Alleged Incident:

You were discriminated because of:

- Race
- Color
- National Origin (Language)

**Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also attach any written material pertaining to your case:**

Signature:

Date:

Chatham Area Transit Authority  
900 E. Gwinnett Street | Savannah, GA 31401  
Phone: 912-629-3909 | [www.catchacat.org](http://www.catchacat.org)

# Appendix C

## Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe  
1234 Bay St.  
Savannah, GA

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Chatham Area Transit Authority alleging \_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 912-629-3912, or write to me at 900 E. Gwinnett Street, Savannah, GA 31401.

Sincerely,

Compliance Coordinator - Programs

# Appendix D

## Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe  
1234 Bay St.  
Savannah, GA

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against the Chatham Area Transit Authority alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for bringing this important matter to our attention. You were extremely helpful during our review of the program. (If a hearing is requested, the following sentence may be appropriate.) You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Compliance Coordinator - Programs

# APPENDIX E

## Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe  
1234 Bay St.  
Savannah, GA

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against Chatham Area Transit Authority alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color or national origin in any program receiving federal financial assistance.

Chatham Area Transit Authority has analyzed the information and facts pertaining to your case for evidence of CAT's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
230 Peachtree, NW  
Suite 800  
Atlanta, GA 30303  
Telephone (404) 865-5600  
Fax (404) 865-5605

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Compliance Coordinator - Programs

# Appendix F

## Title VI Assurances

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “contract”) agrees as follows:

1. Compliance with Regulations: The contractor shall comply with the Regulations relative to nondiscrimination in Federally assisted programs of the Department of Transportation, (hereinafter, “DOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the “Regulations”), which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination: The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color or national origin, in the selection and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment: In all solicitations either by competitive bidding or negotiation bade by the contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplies shall be notified by the contractor of the contractor’s obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color or national origin.

4. Information and Reports: The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by Chatham Area Transit or the Federal Transit Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the contractor shall so certify to Chatham Area Transit or the Federal Transit Administration as appropriate, and shall set forth what efforts is has made to obtain the information.

5. Sanctions for Noncompliance: In the event of the contractor’s noncompliance with nondiscrimination provisions of this contract, Chatham Area Transit shall impose contract sanctions as it or the Federal Transit Administration may determine to be appropriate, including, but not limited to:

- a. Withholding of payments to the contractor under the contract until the contractor complies; and/or
- b. Cancellation, termination, or suspension of the contract, in whole or in part.

6. Incorporation of Provisions: The contractor shall include the provisions of paragraphs 1 through 6 in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as Chatham Area Transit or the Federal Transit Administration may direct as a means of endorsing such provisions including sanctions for noncompliance; provided however, that in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request Chatham Area Transit, and in addition, the contractor may request the United States to enter such litigation to protect the interests of the United States.

**Federal Transit Administration  
Civil Rights Assurances**

Chatham Area Transit hereby certifies that, as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. Chatham Area Transit will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. Chatham Area Transit will make it known to the public that those person or persons alleging discrimination on the basis of race, color or national origin as it relates to provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

---

Michael Brown  
Interim Executive Director

---

Date

# Appendix G

## Service Standards and Policies

---

### Service Standards & Policies

The Chatham Area Transit Authority (CAT) last updated its *Transit Service Guidelines* in February of 2014. This policy document includes the following information and data:

- Service Guidelines
- Travel Markets
- Transit Coverage
- Transit Access
- Bus Stop Spacing and Amenities
- Route Monitoring System
- New Transit Service
- Load Standards
- On-Time Performance
- Duplication of Service
- Route Directness
- Route Patterns
- Service Frequency and Span
- Title VI Implications
- Service Change Process

Please refer to this document for a complete listing of CAT's service standards and policies.

# Appendix H

## Demographic and Service Profile, Maps and Charts

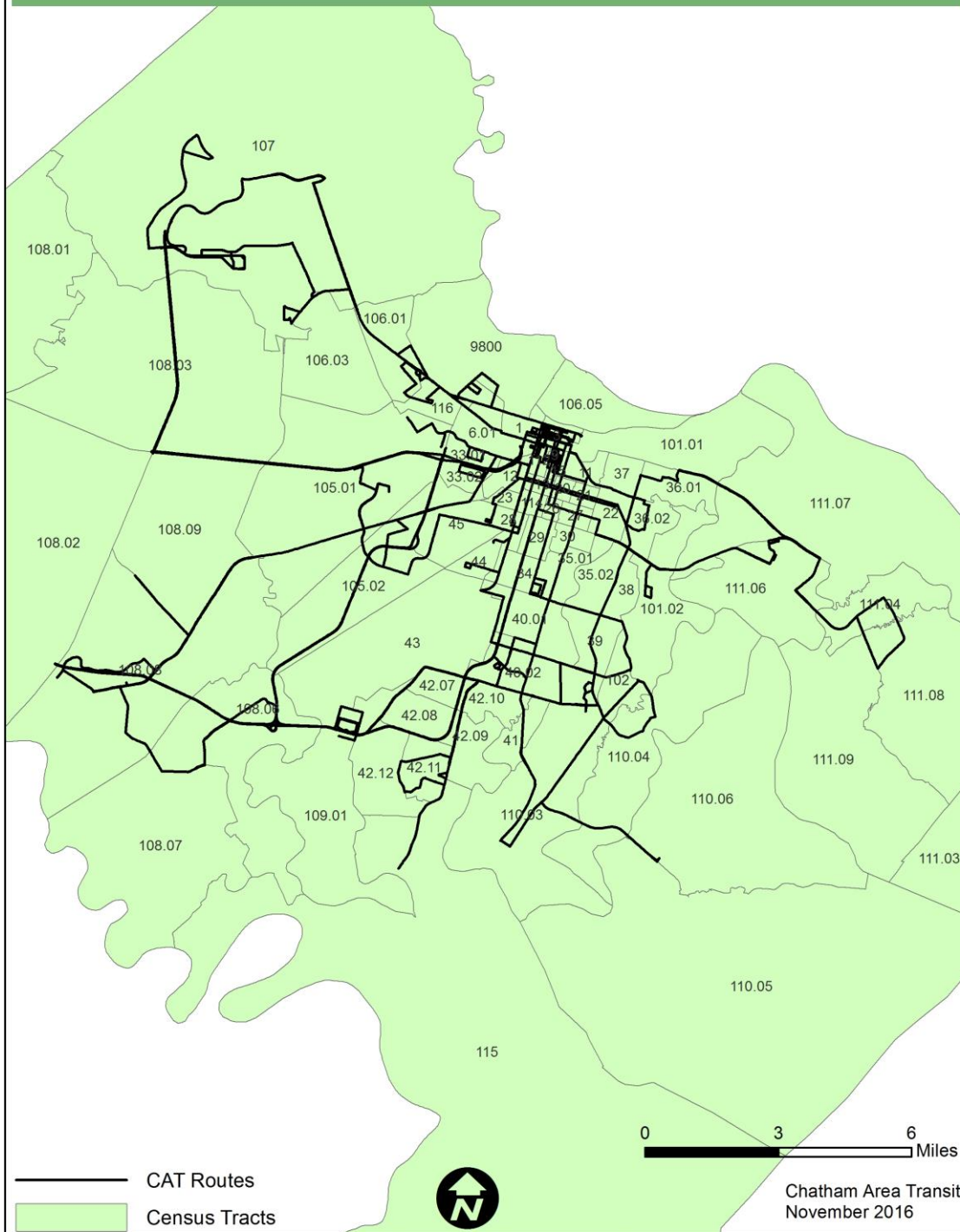
The 2010 U.S. Census identified 233,723 residents in the census tracts within the CAT service area. The minority populations includes: Black, Hispanic or Latino, Asians, Native Americans Alaskan Natives, Pacific Islanders, other non-white races, and persons of two or more races. In the CAT service area, 53% of the residents were designated minority in 2010. In this report, census tracts in which the minority percentage exceeds 53% are defined as minority tracts.

*Service Area Profile:*

	<b>Total Population</b>	<b>Minority Population</b>	<b>% Minority</b>	<b>Low-Income Population</b>	<b>% Low-Income</b>
<b>Chatham County</b>	265,128	131,636	50%	191,806	72%
<b>Transit District</b>	233,723	124,232	53%	185,637	79%

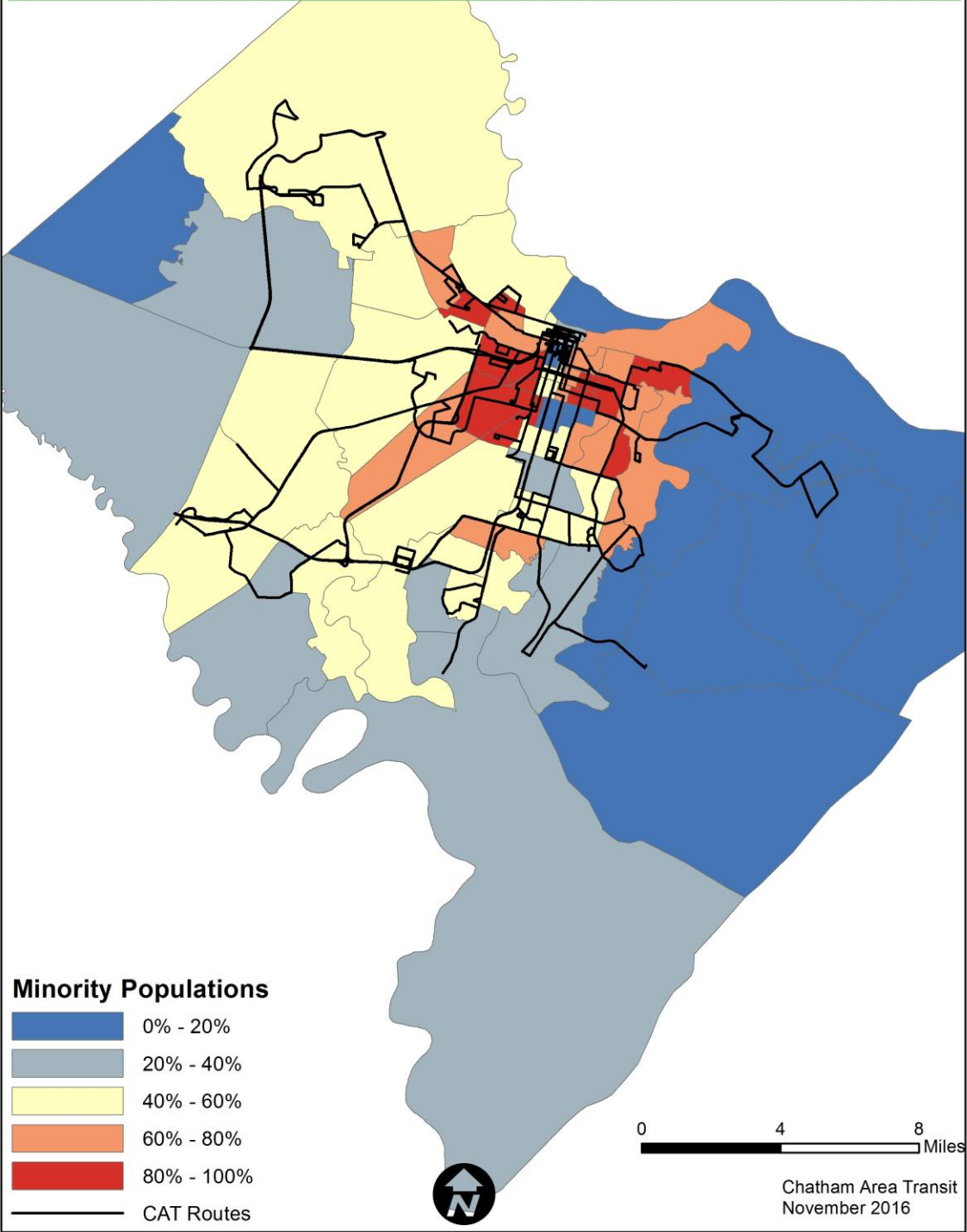
*US Census Tracts:*

# Census Tracts



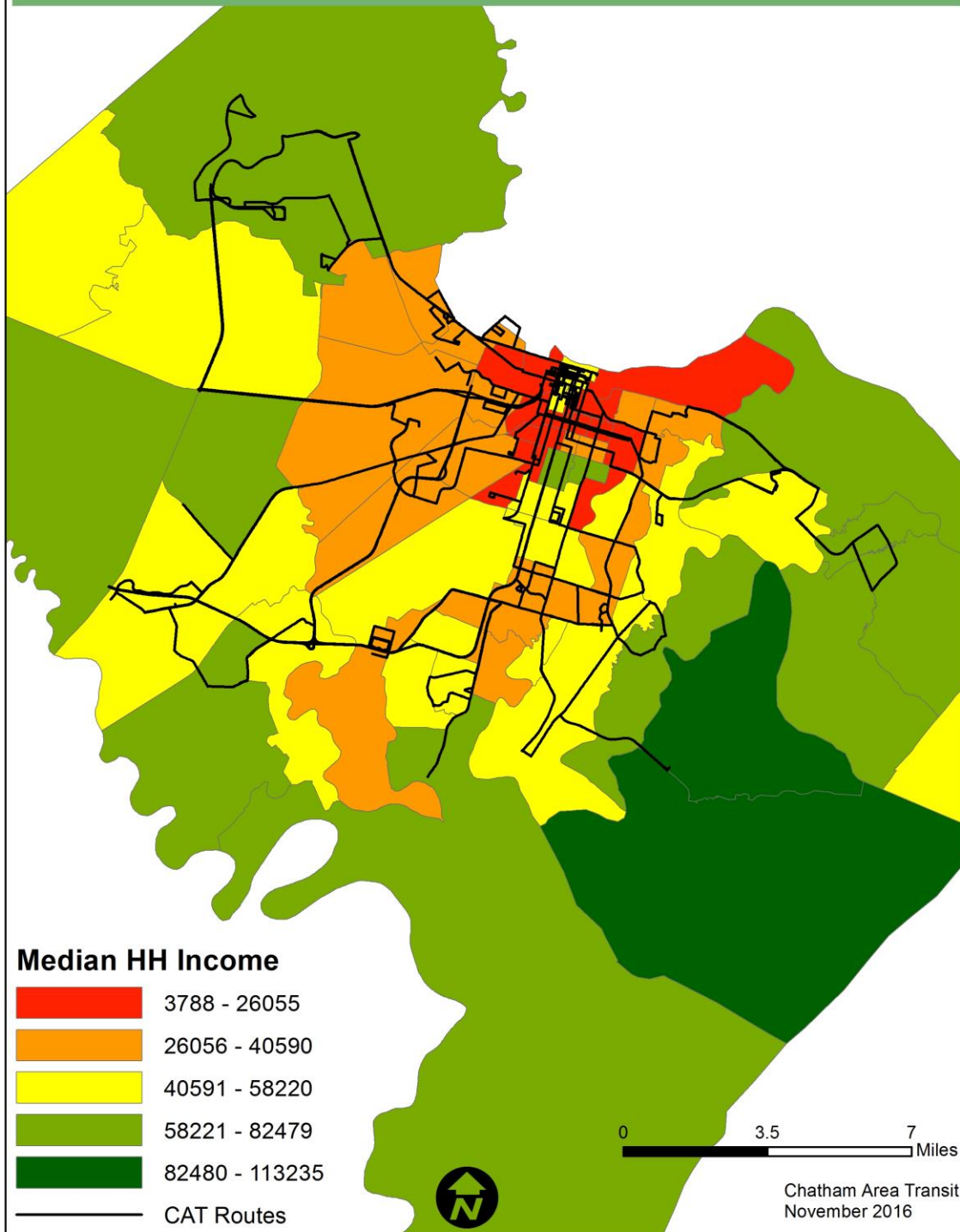
Minority Populations:

# Minority Populations



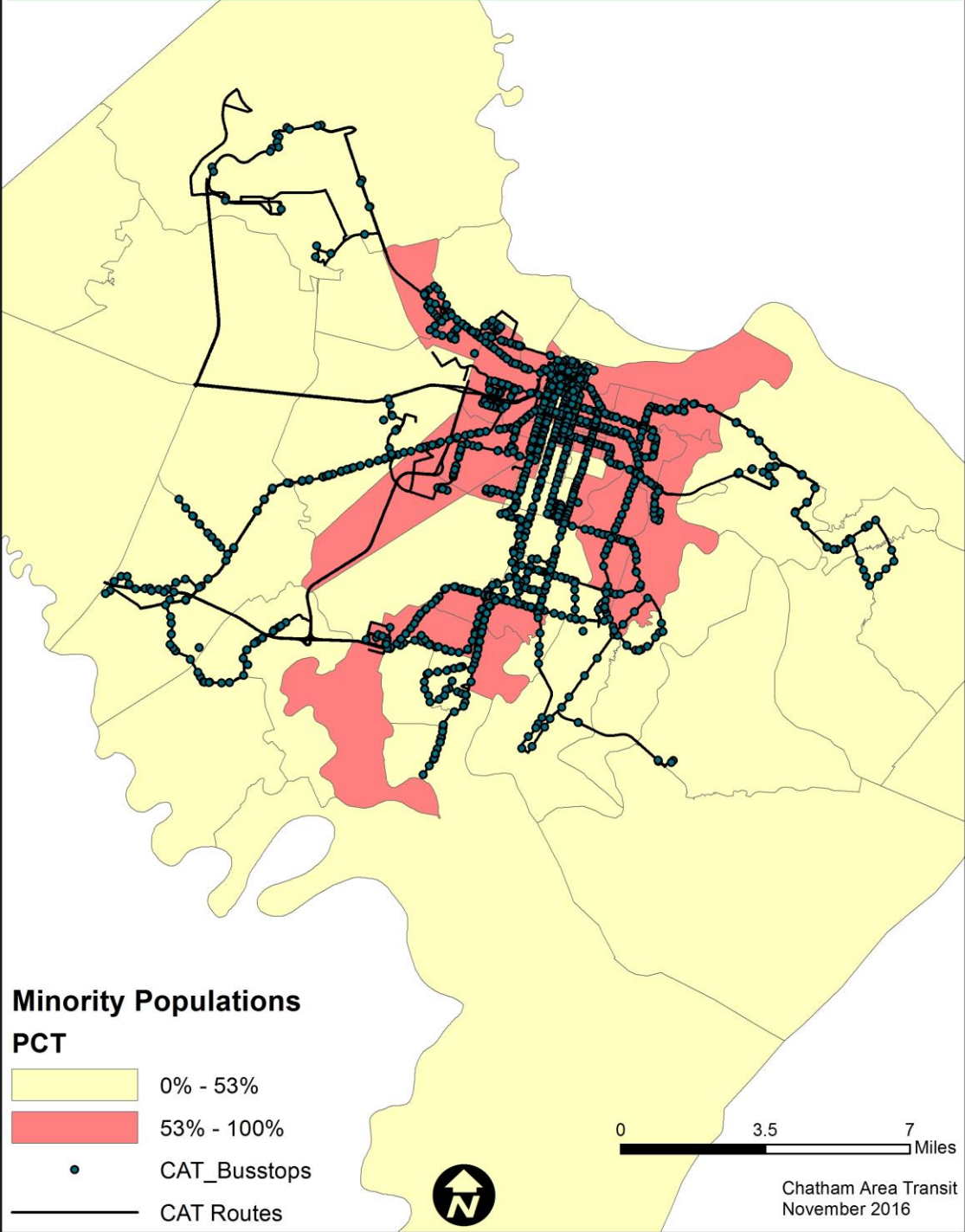
*Low-Income Households:*

# Median Household Income



*Transit Amenities:*

# Transit Amenities



*Minority Routes and Headways:*

Service Type	Route	WK		SAT		SUN	Minority Route	Minority (%)
		Peak	Off-Peak	Peak	Off-Peak	Off-Peak		
<i>Minority Routes</i>								
Local	27 - WATERS	60	60	60	60	60	Yes	56%
Local	17 - SILK HOPE	60	60	60	60	60	Yes	63%
Local	3 - WEST CHATHAM	60	60	60	60	180	Yes	70%
Local	3B - AUGUSTA AVE	60	60	60	60	60	Yes	70%
Local	25 - MLK WEST LAKE	30	30	30	30	30	Yes	72%
Local	29 - WEST GWINNETT	30	60	30	60	60	Yes	75%
Crosstown	12 - HENRY	30	30	30	30	60	Yes	78%
Local	10 - EAST SAVANNAH	60	60	60	60	90	Yes	55%
Crosstown	6 - CROSSTOWN	60	60	60	60	120	Yes	51%
Local	4 - BARNARD	30	60	60	60	60	Yes	50%
Local	31 - SKIDAWAY/SANDFLY	60	60	60	60	120	Yes	54%
	<b>Average</b>	<b>49</b>	<b>52</b>	<b>48</b>	<b>52</b>	<b>82</b>		
<i>Non-Minority Routes</i>								
Shuttle	8 - LIBERTY STREET	20	*	*	*	*	No	25%
Crosstown	20 - MONTGOMERY	120	*	*	*	*	No	44%
Local	11 - CANDLER	90	*	*	*	*	No	48%
Local	14 - ABERCORN LOCAL	30	30	30	30	60	No	49%
Local	28 - WATERS	60	60	60	60	*	No	49%
Shuttle	5D - DOT	20	20	20	20	20	No	45%
Express	100X - AIRPORT EXPRESS	60	60	60	60	*	No	35%
	<b>Average</b>	<b>57</b>	<b>43</b>	<b>43</b>	<b>43</b>	<b>40</b>		

Within Chatham County, a large portion of both minority populations and low-income populations reside near downtown Savannah. Because CAT's transit system is based on a hub-and-spokes model with the Transit Center located downtown, the vast majority of transit routes service these sensitive populations. A breakdown of the transit routes and the percentage of minority and low-income populations within a ¾ mile buffer can be found in the table above.

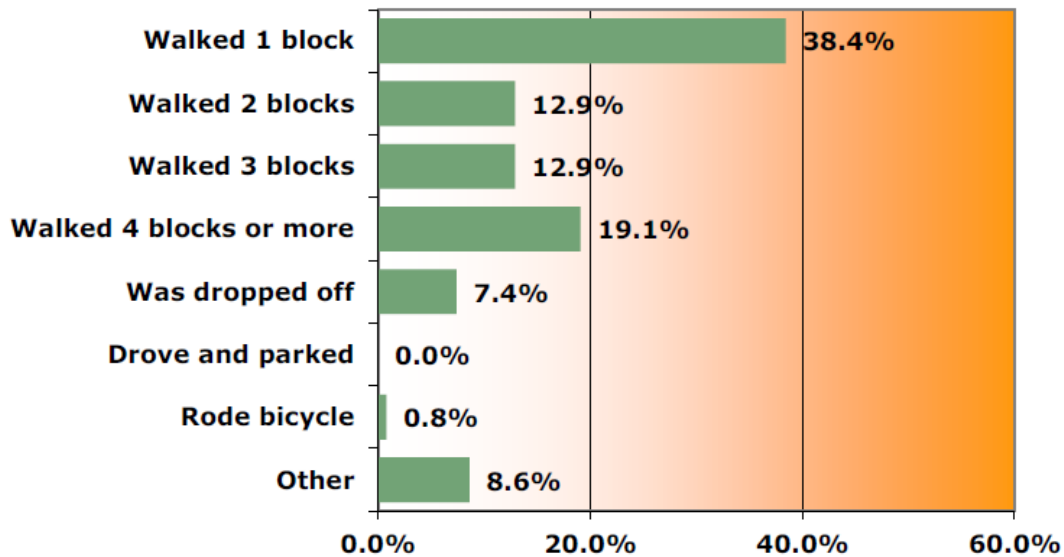
# Appendix I

## Demographic Ridership and Travel Patterns, Collected by Surveys

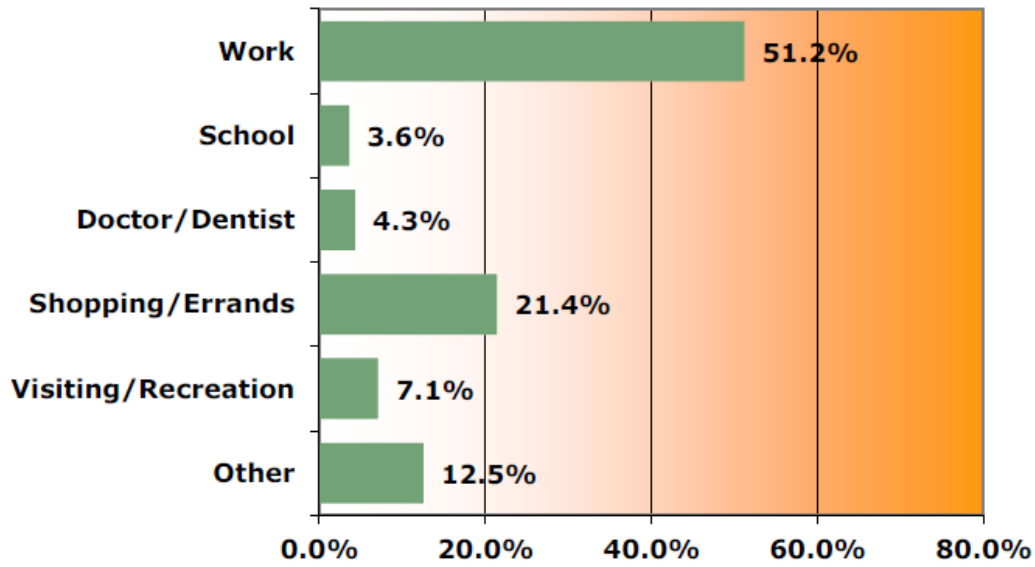
CAT's on-board survey was distributed to fixed route customers to identify their demographic and socio-economic characteristics, trip and travel usage, travel behaviors, and levels of satisfaction with CAT service. A total of 639 responded to the survey.

The analysis of survey data is divided into four sections: Trip Characteristics, Customer Demographics, Fare and Travel Behavior, and Customer Satisfaction.

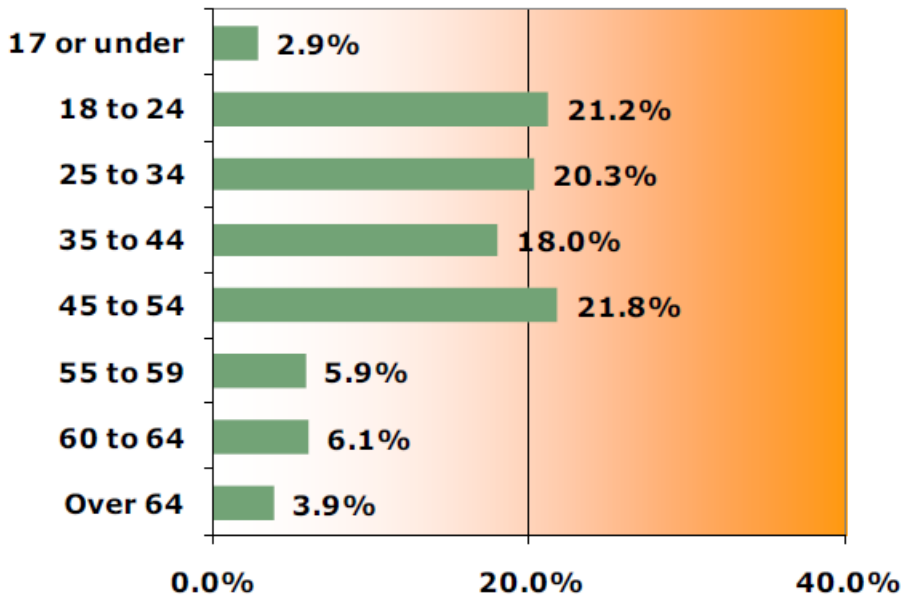
*Mode of Access: How did you get to the bus stop for this trip?*



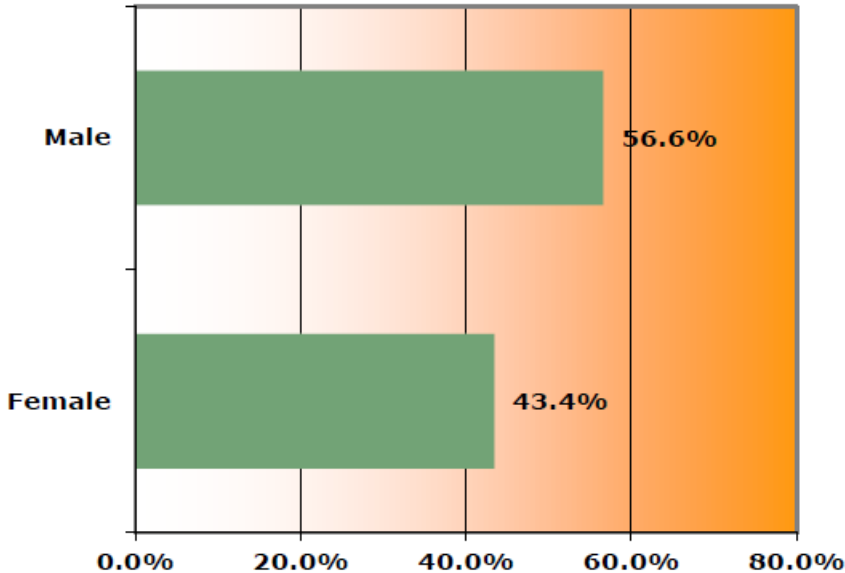
*Trip Purpose: What is the purpose of your trip today?*



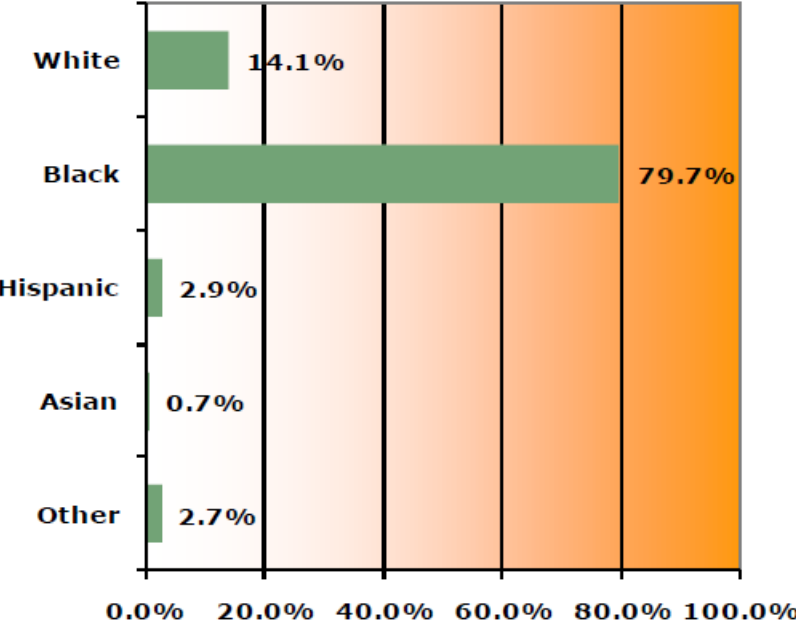
*Age: Your age is....*



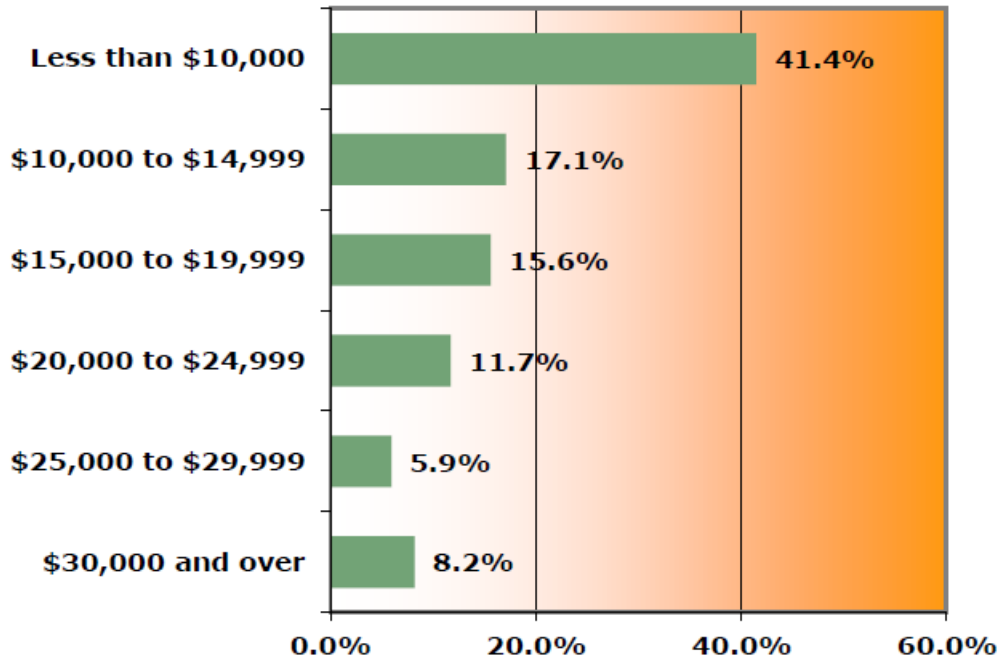
Gender: What is your gender?



Ethnic Heritage: What is your ethnic heritage?

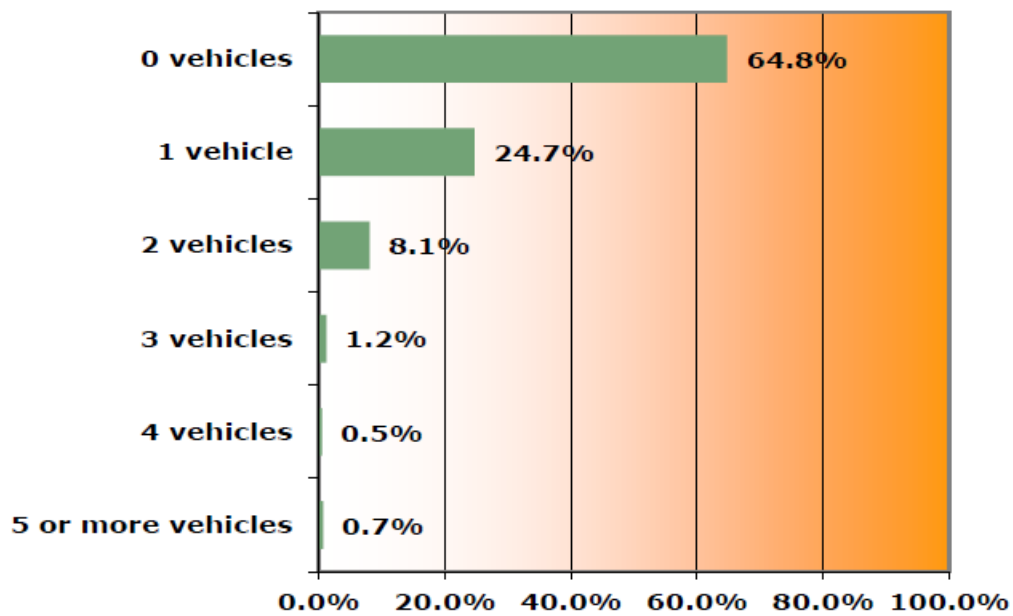


*Household Income: What is your annual household*

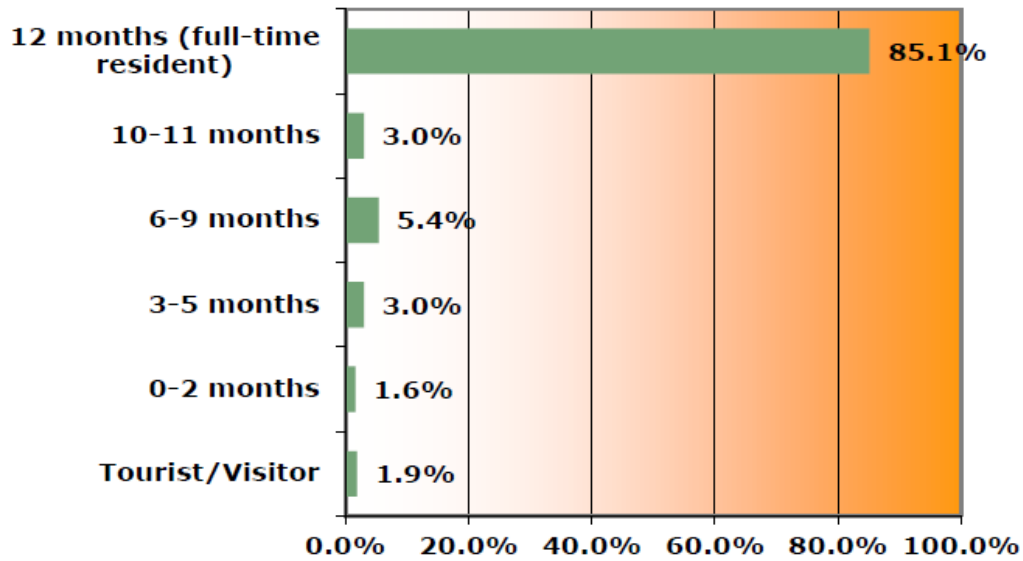


*income?*

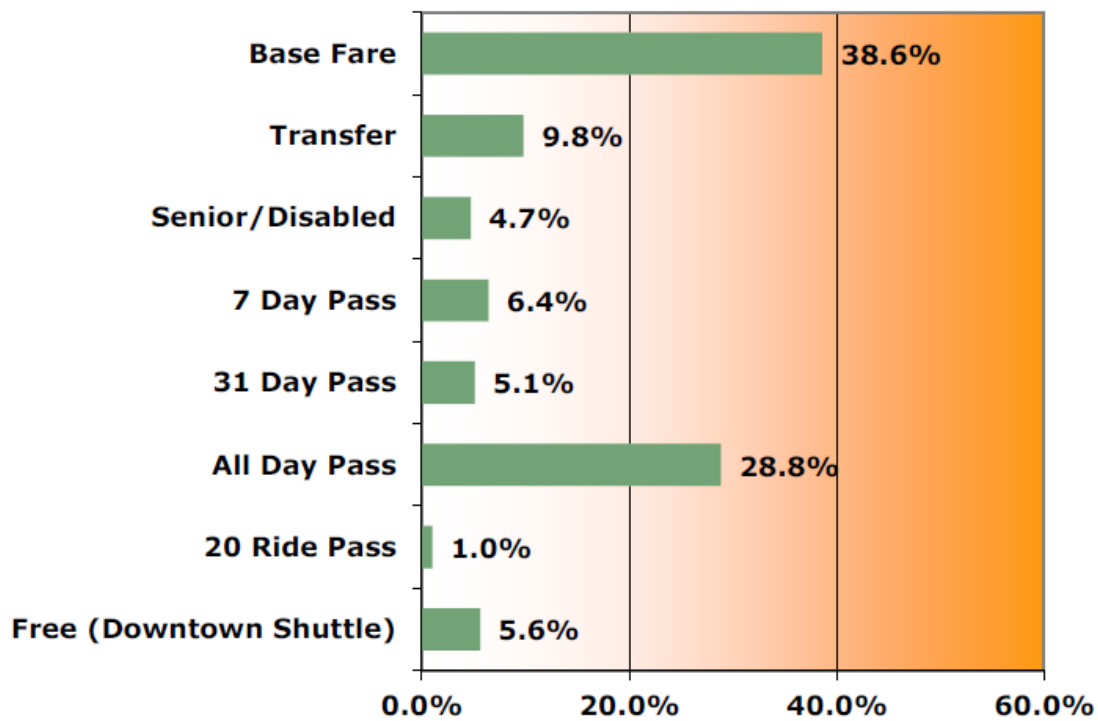
*Vehicle Availability: How many vehicles does your household have available to you?*



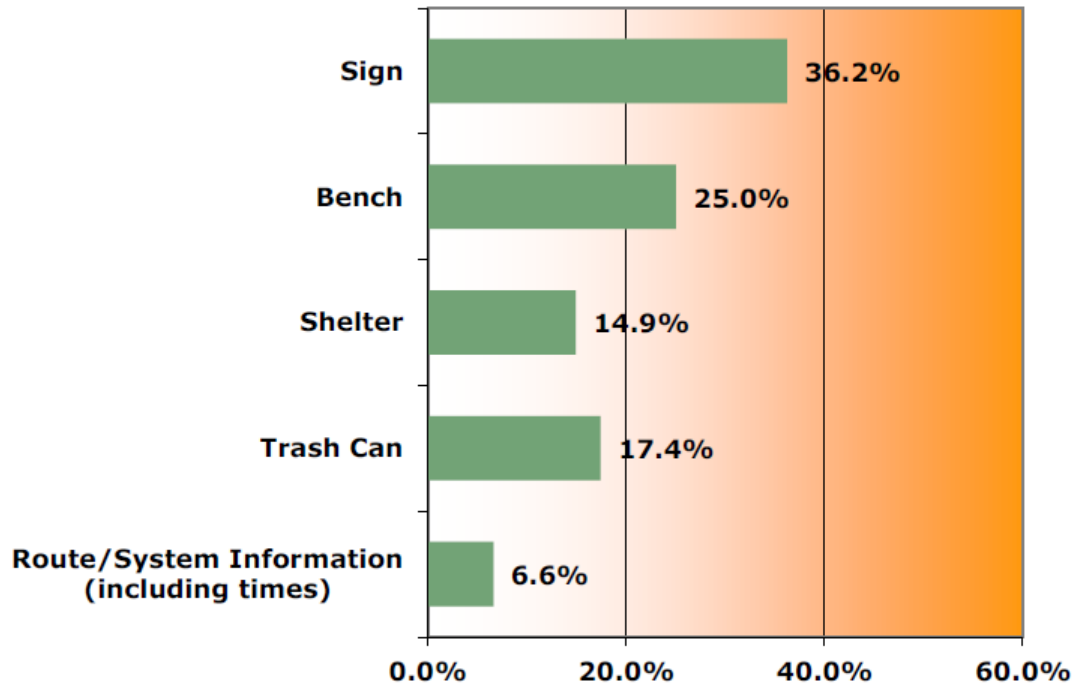
Residency: How many months have you lived in Chatham County?



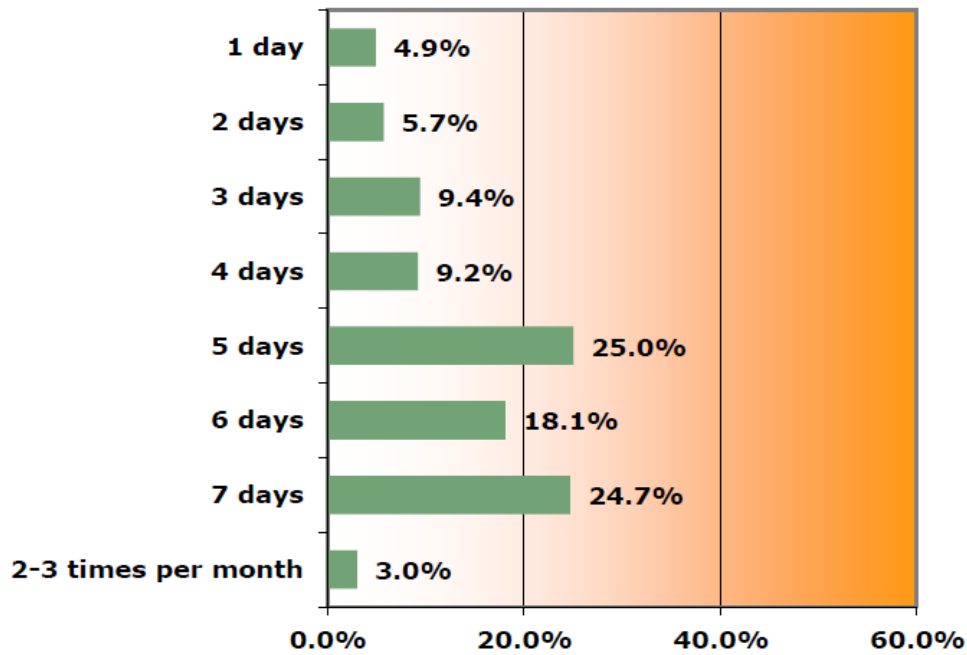
Fare Payment: What type of fare did you use for this trip?



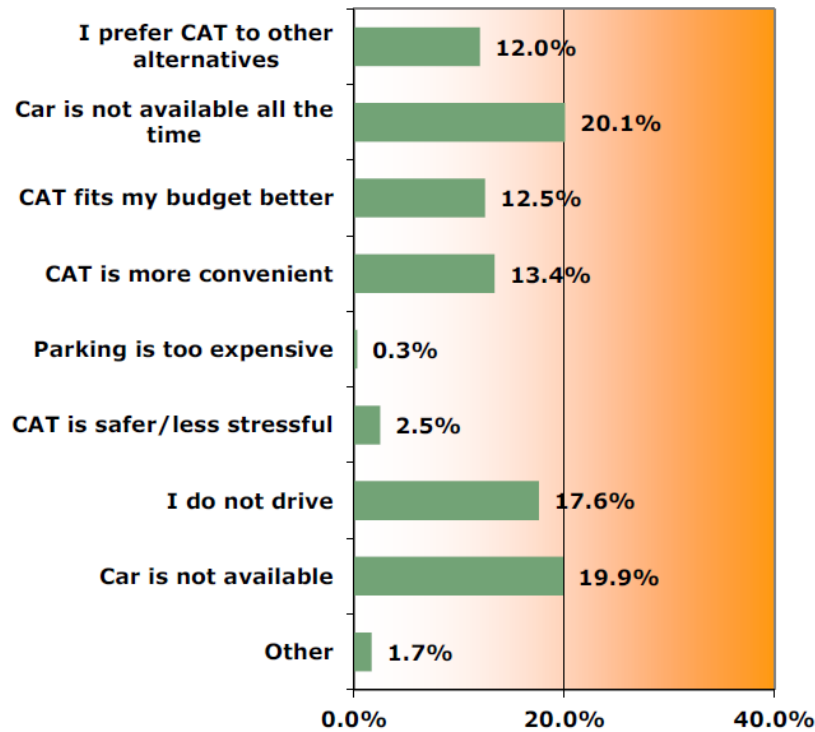
Amenities: Which of the following were at the bus stop where you boarded?



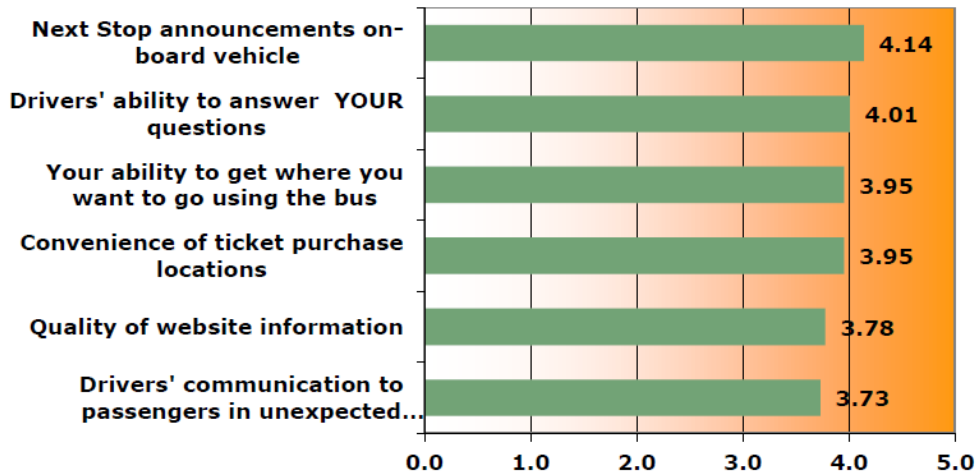
Frequency of Use: On average, how many days a week do you use transit?



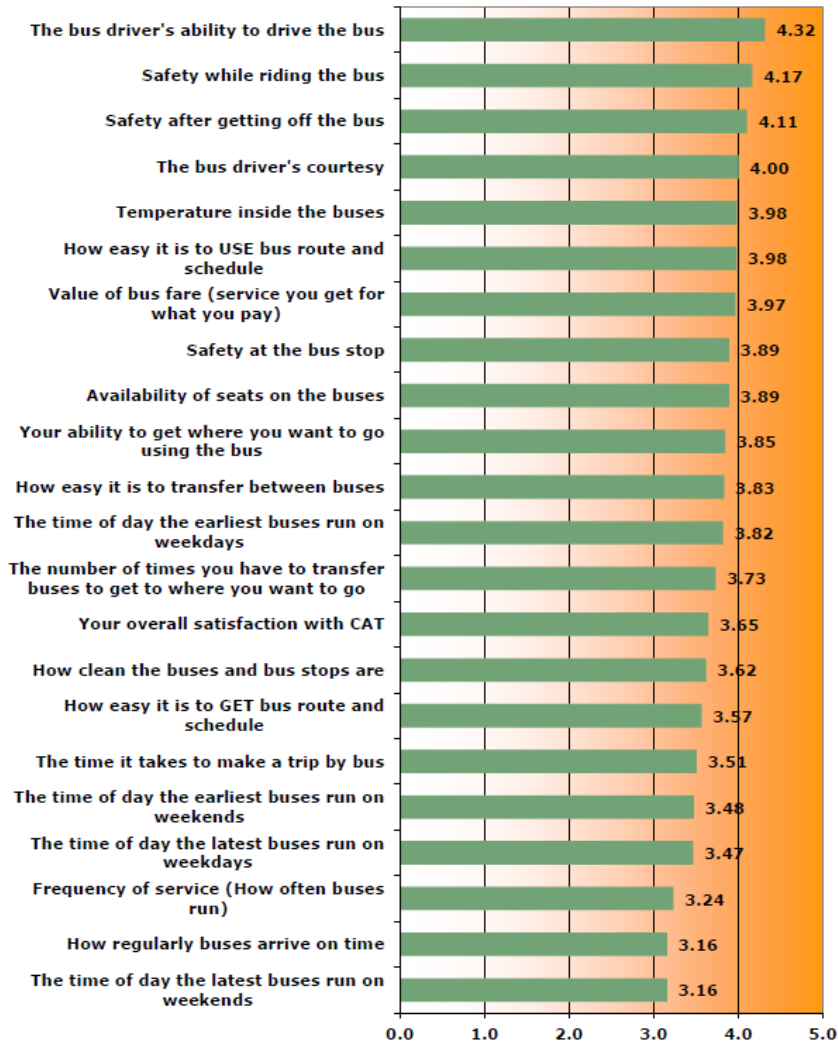
*Reason for Use: What is the most important reason for you using CAT bus service?*



*Customer Satisfaction: How satisfied are you with the following aspects of CAT communication?*



*Customer Satisfaction: How satisfied are you with each of the following...*



*CAT Customer Profile*

The following table represents characteristics of the typical CAT customer based on the results of the on-board survey:

<b>Category</b>	<b>Profile</b>
Gender	Male
Age	45-54
Ethnicity	Black
Annual Household Income	< \$10,000
Vehicles in Household	Zero
Trip Purpose	Work
Trip Destination	Work
Mode of Access	Walk 1 Block
Mode of Egress	Walk 1 Block
Frequency of Use	5 Days Per Week
Tenure of Use	More Than 2 Years
Driver's License	Yes
Residency	Full Time

# Appendix J

## Public Engagement Process - Major Service Change

As described in the *Transit Service Guidelines*, all major service changes as specified by CAT in coordination with FTA are subject to a Title VI Equity Analysis prior to Board approval of the service change. CAT will work to complete an equity analysis for a major service change and present to the public in the form of public meetings and to the CAT Board of Directors for its consideration and included in the Title VI program with a record of action taken by the Board.

A major service change is defined by CAT as: route elimination, new route creation, change of a route in which is 25% or more revenue miles are adjusted to a different route. In addition, anytime there is a 25% or greater change in revenue hours and/or revenue miles, 25% or greater reduction in span of service or fare change all of which will constitute a major service change.

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations.

The threshold is the difference between the burdens borne on low-income populations compared to non-low income populations. Exceeding the threshold means that a fare or service change either negatively impacts low-income populations' more than non-low-income populations or that the change benefits non-low-income populations more than low-income populations.

If the threshold is exceeded, CAT must evaluate whether there is an alternative that has a more equitable impact.

CAT will take steps to propose policy to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by low-income populations compared to non-low-income populations.

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations.

The threshold is the difference between the burdens borne on minority populations compared to non-minority populations. Exceeding the threshold means that a fare or service change either negatively impacts minority populations more than non-minority populations or that the change benefits non-minority populations more than minority populations.

CAT will take steps to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by minority populations compared to non-minority populations.

Chatham Area Transit Authority (CAT) typically implements service changes to its bus service system three (3) times a year. Service changes for CAT bus service are initiated by proposals generated by the

realization of CAT goals and objectives and the identification of problems and issues concerning CAT bus service. The planning, community outreach, and public notification processes are listed in the *Transit Service Guidelines*.

# Appendix K

## Results of Any Service or Fare Equity Analysis Conducted Since Last Title VI Submission

Since the last submission of CAT's Title VI policy there have been no major fare changes and four major changes to the bus routes that would trigger an Equity Analysis. A schedule of the major fare changes that triggered an Equity Analysis and the results of that analysis follow:



### Chatham Area Transit Authority Major Service Changes 2016- 2019

#### Overview

According to CAT's Transit Service Guidelines and Title VI policy, a Major Service Change is defined as *"route elimination, new route creation, change of a route in which is 25% or more revenue miles are adjusted to a different route. In addition, anytime there is a 25% or greater change in revenue hours and/or revenue miles, 25% or greater reduction in span of service or fare change all of which will constitute a major service change."*

#### List of Major Service Changes 2016-2019

1. February 2017: Route 75 discontinuation
2. July 2017: Route 170X discontinuation
3. September 2017: Route 5D & 8 discontinuation, Route 7D creation
4. July 2018: Route 7D service span expansion

Each of the major service changes listed above involved the discontinuation or creation of agency funded services that CAT provides for community partners (City of Savannah and Savannah State University). These services are 100% subsidized by the partner and thus are subject to increases and decreases in service due to partner priorities and budgets. Despite being agency funded services, all of CAT's services are open to the public and therefore CAT followed the necessary steps for Title VI compliance when conducting a major change.

From 2016 to 2019 none of CAT's core fixed routes experienced a Major Service Change.

# Route 75 Discontinuation:



**CHATHAM AREA TRANSIT**

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912.233.5767

610 W. Oglethorpe Avenue  
Savannah, Georgia 31401

[www.catchacat.org](http://www.catchacat.org)

## TITLE VI EQUITY ANALYSIS

Route: 75 (Eastside Prowler)

Date: 1/5/2016

Service Change Classification: Discontinuation of Service (Major)

### Introduction

In 2012 the Federal Transit Administration (FTA) updated its Title VI regulations under Circular 4702.1B, which requires grantees to evaluate service changes and proposed service improvements to determine whether those changes have an adverse impact on minority or low-income populations. As mandated in 4702.1B, Chatham Area Transit (CAT) has a Title VI policy, which offers guidance as to how the authority should prepare an equity analysis in the event of any major service changes. This equity analysis was prepared in consultation with the CAT Title VI policy, as well as FTA Circular 4702.1B.

### Existing Service Levels & Ridership

Route 75 currently runs from 8:00PM to 2:00AM on Fridays and Saturdays. The route originates at Island Towne Centre and makes stops at Island Tree Apartments, Jasmine Place Apartments, and Alhambra Apartments before stopping at the Savannah State University campus. From campus, the route takes the Harry Truman Parkway downtown, does a short loop around the historic district, and then heads back to Island Towne Centre via President Street. Roundtrip, the route takes one (1) hour.

Ridership productivity on Route 75 has significantly declined over the last two years, prompting CAT staff to take a closer look as to whether or not the authority should maintain the service. In FY15 Route 75 averaged 12 passengers per hour and in FY16 that figure dropped to 4 passengers per hour (see Figure 1 below). While staff were encouraged by an increase in ridership productivity in August 2016, the fall months of FY17 experienced similar productivity to FY16, averaging just over 4 passengers per hour.

According to GFI farebox data, roughly 95% of the passengers who use Route 75 are SSU students. Because CAT and the university have an existing contract which allows SSU students to ride all of CAT's routes free of charge, very little farebox revenue is collected on Route 75 to offset the costs of operations. Due to low farebox recovery and ridership productivity rates, CAT staff are recommending the discontinuation of this service.

Figure 1: Route 75 Ridership Productivity FY15 and FY16

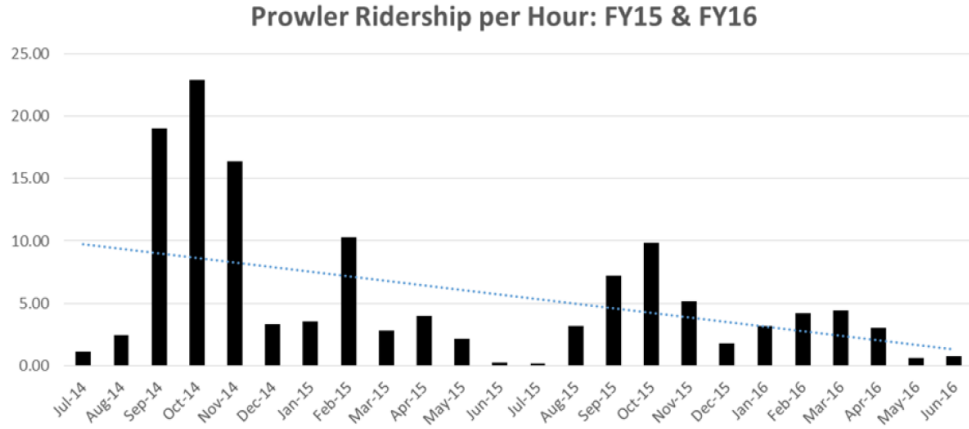
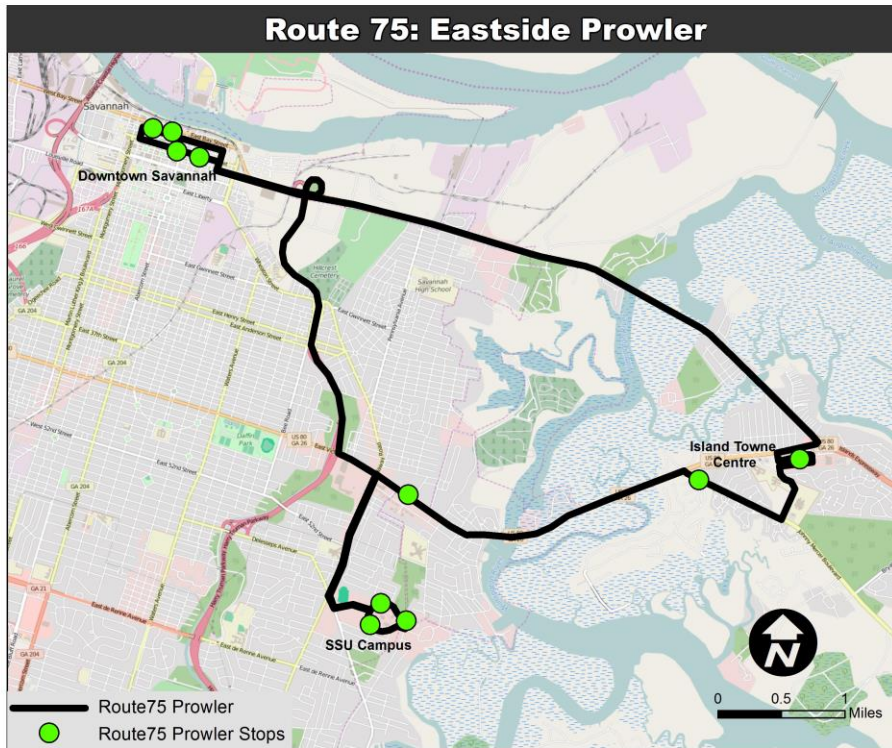


Figure 2: Route 75 Map



**Disproportionate Burden**

CAT’s Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations. The threshold is the difference between the burdens borne on low-income populations compared to non-low income populations. Exceeding the threshold means that a fare or service change either negatively impacts low-income populations’ more than non-low-income populations or that the change benefits non-low-income populations more than low-income populations.

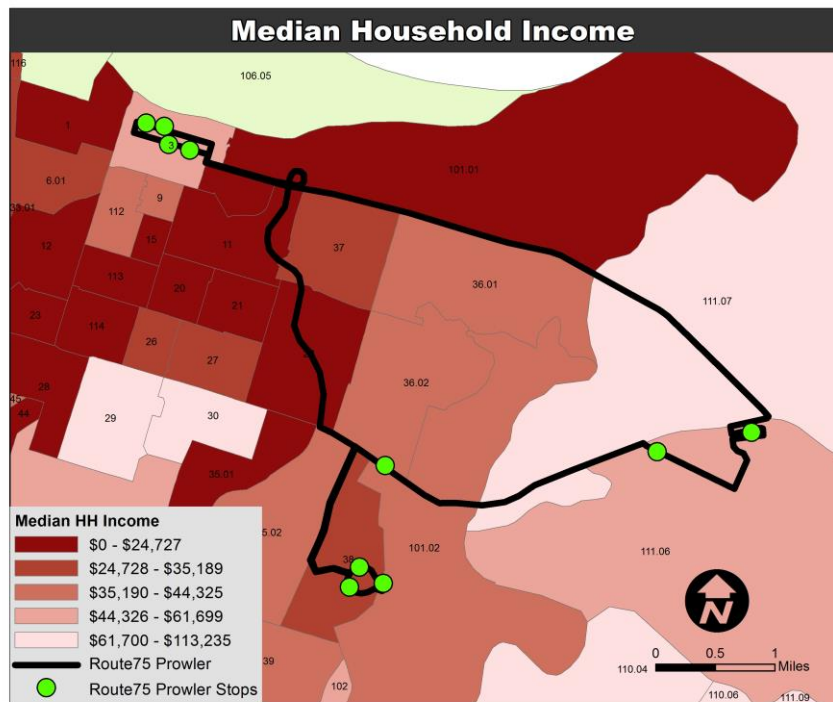
If the threshold is exceeded, CAT must evaluate whether there is an alternative that has a more equitable impact. CAT will take steps to propose policy to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by low-income populations compared to non-low-income populations

According to the American Community Survey (ACS) and the U.S. Census Bureau, the median household income in Chatham County is \$47,218. CAT staff mapped the 2015 ACS estimates for median household income in the areas that are serviced by Route 75. Using quantile breaks, staff were able to identify areas with median household incomes in the 20<sup>th</sup>, 40<sup>th</sup>, 60<sup>th</sup>, 80<sup>th</sup>, and 100<sup>th</sup> percentile. Low income stops were classified as any stop located in an area with a median household income in the 40<sup>th</sup> percentile or lower within Chatham County. There were 3 stops along this route that fell into that classification out of 10 total stops. The difference between low income stops and non-low income stops was -40%, thus no disproportionate burden exists (see Table 1).

Table 1: Low Income Stops versus Non-Low Income Stops

Route	Low Income Stops	Non-Low Income Stops	Difference
75 (Prowler)	30%	70%	-40%

Figure 3: Median Household Income



### Disparate Impact

CAT’s Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disparate impact on minority populations compared to non-minority populations. Exceeding the threshold means that a fare or service change either negatively impacts minority populations more than non-minority

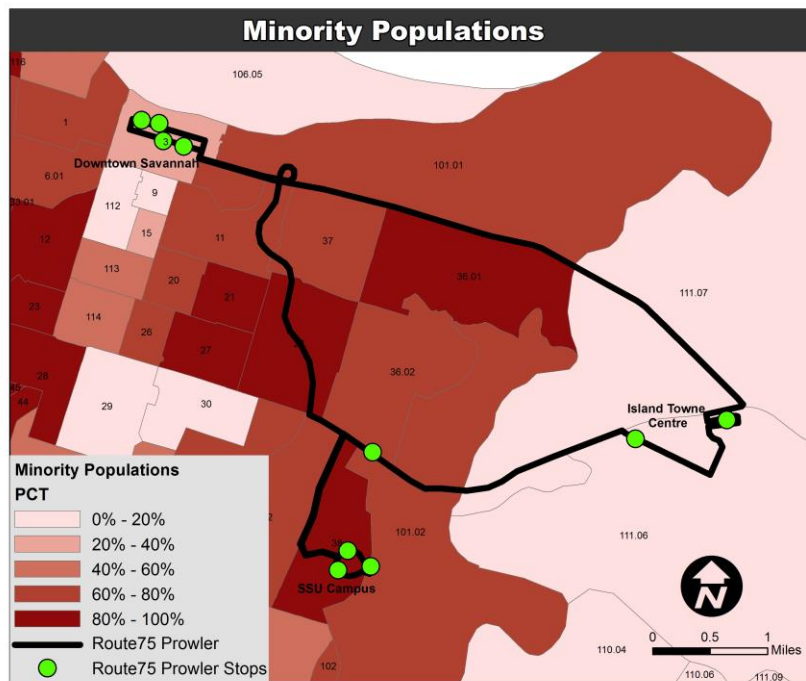
populations or that the change benefits non-minority populations more than minority populations. CAT will take steps to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by minority populations compared to non-minority populations.

According to the American Community Survey (ACS) and the U.S. Census Bureau, minorities account for roughly 50% of Chatham County’s population. CAT staff mapped the 2015 ACS estimates for minority populations in the areas that are serviced by Route 75. Using quantile breaks, staff were able to identify areas with minority populations that account for 20%, 40%, 60%, 80% and 100% of the area’s residents. Minority stops were classified as any stop located in an area with more than 60% minority populations. There were 4 stops along this route that fell into that classification out of 10 total stops. The difference between low income stops and non-low income stops was -20%, thus no disparate impact exists (see Table 2).

Table 2: Minority Stops versus Non-Minority Stops

Route	Minority Stops	Non-Minority Stops	Difference
75 (Prowler)	40%	60%	-20%

Figure 4: Minority Populations



**Public Feedback**

As required in federal guidelines, as well as CAT’s Transit Service Guidelines, the Authority must hold at least one Public Meeting to solicit feedback from the community regarding major service changes. CAT staff held three public meetings in an attempt to gather feedback on the proposed discontinuation of Route 75. A summary of the meetings is listed below.

- *Public Meeting #1*

- Wednesday, December 14<sup>th</sup> 2016
- 610 West Oglethorpe Ave (Transit Center)
- Attendees: 8
- Comments:
  - The elimination of Route 75 could be offset with an evening tripper on Route 31
  - Route 31 is always full and has schedule adherence issues. Shifting resources from Route 75 to Route 31 makes sense.
- *Public Meeting #2*
  - Wednesday, January 11<sup>th</sup> 2017
  - 610 West Oglethorpe Ave (Transit Center)
  - Attendees: 8
  - Comments:
    - A regular CAT passenger has had conversations with SSU students about Route 75 and there is consensus that students do not use this route.
    - Management at the Thunderbolt Marina shared a comment before the meeting stating that Route 75's schedule was not strict and the route was not particularly convenient for marina patrons.
- *Public Meeting #3*
  - Friday, January 13<sup>th</sup> 2017
  - Savannah State University Campus, Social Sciences Building
  - Attendees: 1
  - Comments:
    - Route 75 has become less reliable over the last year, hence why ridership has tailed off
    - On-campus construction has disturbed the Route 75 schedule
    - Students are more likely to take Uber and Lyft downtown due to it's flexible, on-demand schedule
    - Few passengers boarded/alighted at Island Towne Centre

# Route 170X Discontinuation:



**CHATHAM AREA TRANSIT**

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912.233.5767

610 W. Oglethorpe Avenue  
Savannah, Georgia 31401

[www.catchacat.org](http://www.catchacat.org)

## TITLE VI EQUITY ANALYSIS

Route: 170X (University Express)

Date: 6/1/2017

Service Change Classification: Discontinuation of Service (Major)

### Introduction

In 2012 the Federal Transit Administration (FTA) updated its Title VI regulations under Circular 4702.1B, which requires grantees to evaluate service changes and proposed service improvements to determine whether those changes have an adverse impact on minority or low-income populations. As mandated in 4702.1B, Chatham Area Transit (CAT) has a Title VI policy, which offers guidance as to how the authority should prepare an equity analysis in the event of any major service changes. This equity analysis was prepared in consultation with the CAT Title VI policy, as well as FTA Circular 4702.1B.

### Existing Service Levels & Ridership

Route 170X currently runs from 12:00PM to 8:00PM on Tuesday, Friday Saturday and Sunday. The route originates at Savannah State University's Student Union facility and makes stops at McAlpin Square, Oglethorpe Mall, and Walmart on Montgomery Cross Road before circling back to the University. Roundtrip, the route takes one (1) hour.

Ridership productivity on Route 170X has increased over the last two years, but budget shortfalls have prompted staff to take a closer look at how the service is funded. The University Express launched as a pilot program in coordination with the "UPASS" partnership between Savannah State University (SSU) and CAT. SSU and CAT entered into a contract where CAT provided certain services to the University, including the 170X, and allowed SSU students to ride fare-free on CAT's regular fixed routes. The fee imposed on the University was intended to cover a campus shuttle, but the University Express was offered as a promotional service to attract more SSU students to take transit. While the route was open to the public, 99% of 170X passengers were students and therefore the route received no farebox recovery.

Due to the budget shortfalls and the low farebox recovery, CAT staff are recommending the discontinuation of this service.

Figure 1: Route 170X Ridership Productivity FY15 and FY16

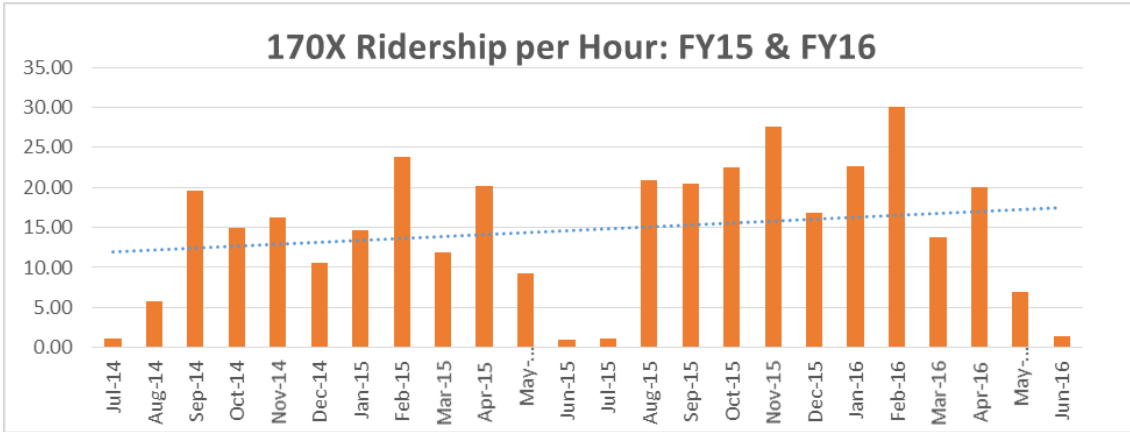
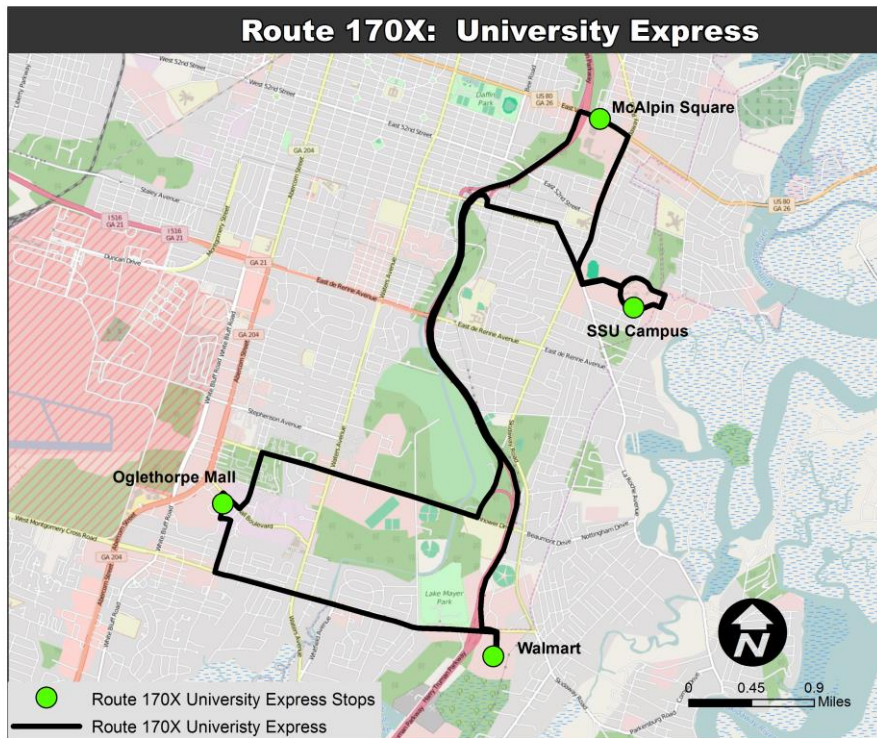


Figure 2: Route 170 Map



**Disproportionate Burden**

CAT’s Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations. The threshold is the difference between the burdens borne on low-income populations compared to non-low income populations. Exceeding the threshold means that a fare or service change either negatively impacts low-income populations’ more than non-low-income populations or that the change benefits non-low-income populations more than low-income populations.

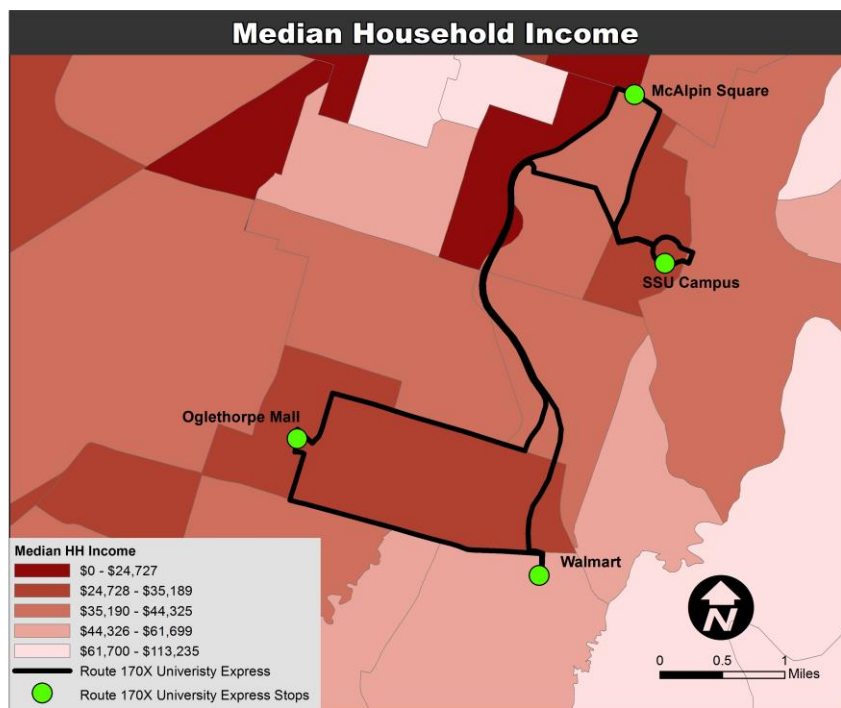
If the threshold is exceeded, CAT must evaluate whether there is an alternative that has a more equitable impact. CAT will take steps to propose policy to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by low-income populations compared to non-low-income populations

According to the American Community Survey (ACS) and the U.S. Census Bureau, the median household income in Chatham County is \$47,218. CAT staff mapped the 2015 ACS estimates for median household income in the areas that are serviced by Route 170X. Using quantile breaks, staff were able to identify areas with median household incomes in the 20<sup>th</sup>, 40<sup>th</sup>, 60<sup>th</sup>, 80<sup>th</sup>, and 100<sup>th</sup> percentile. Low income stops were classified as any stop located in an area with a median household income in the 20<sup>th</sup> percentile or lower within Chatham County. There was only 1 stop along this route that fell into that classification out of 4 total stops. The difference between low income stops and non-low income stops was -50%, thus no disproportionate burden exists (see Table 1).

Table 1: Low Income Stops versus Non-Low Income Stops

Route	Low Income Stops	Non-Low Income Stops	Difference
170X (University Express)	25%	75%	-50%

Figure 3: Median Household Income



**Disparate Impact**

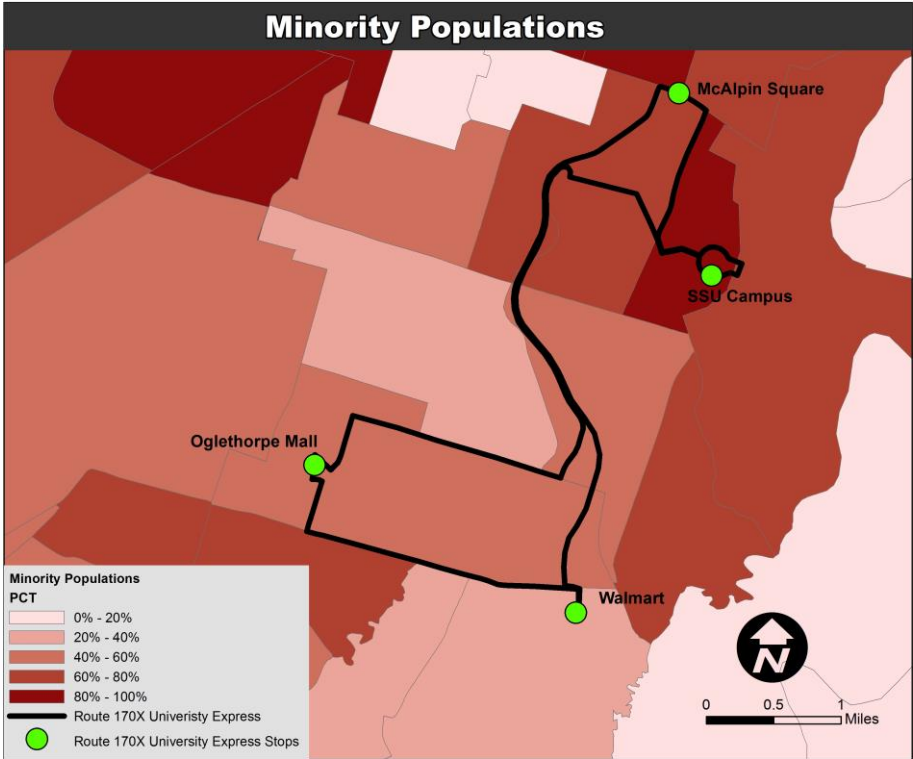
CAT’s Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disparate impact on minority populations compared to non-minority populations. Exceeding the threshold means that a fare or service change either negatively impacts minority populations more than non-minority populations or that the change benefits non-minority populations more than minority populations. CAT will take steps to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by minority populations compared to non-minority populations.

According to the American Community Survey (ACS) and the U.S. Census Bureau, minorities account for roughly 50% of Chatham County’s population. CAT staff mapped the 2015 ACS estimates for minority populations in the areas that are serviced by Route 75. Using quantile breaks, staff were able to identify areas with minority populations that account for 20%, 40%, 60%, 80% and 100% of the area’s residents. Minority stops were classified as any stop located in an area with more than 60% minority populations. There were 2 stops along this route that fell into that classification out of 4 total stops. The difference between low income stops and non-low income stops was 0%, thus no disparate impact exists (see Table 2).

Table 2: Minority Stops versus Non-Minority Stops

Route	Minority Stops	Non-Minority Stops	Difference
170X (University Express)	50%	50%	0%

Figure 4: Minority Populations



**Public Feedback**

As required in federal guidelines, as well as CAT’s Transit Service Guidelines, the Authority must hold at least one Public Meeting to solicit feedback from the community regarding major service changes. CAT staff held three public meetings in an attempt to gather feedback on the proposed discontinuation of Route 170X. A summary of the meetings is listed below.

- *Public Meeting #1*
  - Wednesday, May 10<sup>th</sup> 2017
  - 610 West Oglethorpe Ave (Transit Center)
  - Attendees: 13
  - Comments:
    - Savannah Alderman Van Johnson shared that the discontinuation of the 170X could be a hasty move. He went on to say that ridership might be down because of the construction occurring on campus and that alternatives should be considered.
- *Public Meeting #2*
  - Thursday, May 11<sup>th</sup> 2017
  - Savannah State University, Student Union
  - Attendees: 6
  - Comments:
    - One student said that it will be difficult for students to utilize Route 31 and Route 12 in lieu of the 170X because the 170X made a stop in the middle of campus. Routes 31 and 12 stop near campus, but this will require students to walk long distances with bags, groceries, etc.
    - One student said that she expects students to take Uber to the Mall and Walmart instead of utilizing Route 31 and Route 12
    - One student suggested that we synchronize the schedules of our on-campus shuttle to allow for smoother connections with off-campus routes
    - One student suggested that we increase the marketing of Route 31 and Route 12 to students to encourage them to ride those routes to the Mall and Walmart.
- *Public Meeting #3*
  - Wednesday, June 14<sup>th</sup> 2017
  - 610 West Oglethorpe Ave (Transit Center)
  - Attendees: 1
  - Comments:
    - The one attendee thought it was a good idea to discontinue the 170X in favor of repurposing its resources towards serving other neighborhoods.

# Route 5D & 8 Discontinuation, 7D Creation:

## TITLE VI EQUITY ANALYSIS

Routes: 5D (dot Express), 8 (Liberty Shuttle)

Date: 7/10/2017

Service Change Classification: Discontinuation of Service (Major), New Service (Major)

### Introduction

In 2012 the Federal Transit Administration (FTA) updated its Title VI regulations under Circular 4702.1B, which requires grantees to evaluate service changes and proposed service improvements to determine whether those changes have an adverse impact on minority or low-income populations. As mandated in 4702.1B, Chatham Area Transit (CAT) has a Title VI policy, which offers guidance as to how the authority should prepare an equity analysis in the event of any major service changes. This equity analysis was prepared in consultation with the CAT Title VI policy, as well as FTA Circular 4702.1B.

### Existing Service Levels & Ridership

#### *Route 5D (dot Express)*

Route 5D currently runs from 9:00AM to 7:00PM seven days a week. The route originates at CAT's downtown Intermodal Transit Center and circulates through downtown Savannah, making stops at key tourist destinations. Roundtrip, the route takes forty (40) minutes. This service is partially subsidized by Savannah Mobility Management, Inc. (SaMMI) and is offered fare-free to all passengers.

Ridership productivity on Route 5D has remained relatively stable over the last two years averaging roughly 18 passengers per hour. In early 2017, CAT deployed two new trolley vehicles for use on Route 5D. These new vehicles did not come with traditional fareboxes but instead came equipped with Automatic Passenger Counters (APCs). The change in methodology for capturing ridership data has resulted in a significant increase in observed ridership along this route, thus making it difficult for planners to accurately compare recent data to historical data.

#### *Route 8 (Liberty Shuttle)*

Route 8 currently runs from 6:20AM–9:10AM and from 3:40PM-6:20PM Monday through Thursday, from 6:20AM-9:10AM, 3:40PM-6:20PM, and from 9:30PM-2:10AM on Friday, and from 9:30PM-2:10AM on Saturday. The route originates at the Liberty Street Parking Garage and circulates downtown to each of the major city-owned parking structures.

The original intent of this service was to shuttle travelers, including city employees, from the parking garages to their final destinations downtown. However, over the past year, ridership productivity has steadily decreased to below 10 passengers per hour.

In 2016, the City of Savannah completed its downtown mobility study titled "Parking Matters." One of the many recommendations developed through this study included the consolidation of downtown circulators to be more frequent and easier to understand for tourists and residents alike. The consultants who performed the study developed three new downtown routes, which offered frequencies of 10-minutes or better. City of Savannah staff and CAT planning staff modified the proposed routing scheme to develop two new downtown circulators: a north-south loop extending from Bryan Street to Park Avenue and an east-west loop extending from Martin Luther King Boulevard to Price Street.

CAT staff propose the discontinuation of Route 5D and Route 8, replacing it with these two new frequent downtown circulator routes.

Maps of the existing route 5D (dot Express) and 8 (Liberty Shuttle) can be found in Figures 1 and 2 in the Appendix.

## **Policies**

### *Disproportionate Burden Policy*

CAT's Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations. The threshold is the difference between the burdens borne on low-income populations compared to non-low income populations. Exceeding the threshold means that a fare or service change either negatively impacts low-income populations' more than non-low-income populations or that the change benefits non-low-income populations more than low-income populations.

If the threshold is exceeded, CAT must evaluate whether there is an alternative that has a more equitable impact. CAT will take steps to propose policy to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by low-income populations compared to non-low-income populations.

### *Disparate Impact Policy*

CAT's Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disparate impact on minority populations compared to non-minority populations. Exceeding the threshold means that a fare or service change either negatively impacts minority populations more than non-minority populations or that the change benefits non-minority populations more than minority populations. CAT will take steps to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by minority populations compared to non-minority populations.

## **Methodology**

CAT will be discontinuing Routes 5D (dot Express) and 8 (Liberty Shuttle) and replacing them with two new downtown shuttles. The new shuttles will have frequencies of 10-minutes or better. These services will be fully subsidized by the City of Savannah.

Per CAT's Title VI policy, Disproportionate Burden and Disparate Impact Analyses are required in this circumstance given that two routes are proposed for discontinuation and two new routes are being proposed for service. Both instances are classified as a Major Service Change, thus triggering the development of an analysis.

Chatham Area Transit (CAT) used Remix ([www.remix.com](http://www.remix.com)) to undertake the Title VI analysis for this project. Remix allows CAT to automatically generate a Title VI Report, using Census data, by comparing existing service to a set of proposed changes. This methodology uses Census Block Group data to analyze the impact to existing populations. The detailed methodology used to achieve this includes the following steps:

1. Get the population near a route, including its low income and minority percentage.
  - a. For each route, build a shape that represents the area within quarter mile of any of its stops.
  - b. Intersect the catchment area with 2009-2013 ACS Census data. Get a list of block groups and the percentage overlap with each.
  - c. For each block group, take the percentage of overlap and multiply it by the block group's statistics.

- d. Get the population, minority population, and low income population for each group and sum them together. This is the total population a route could serve.
2. Compare the service population percentage change in impacted Census Groups
    - a. Subtract the “Before” percentage from the “After” percentage for Low-Income populations
    - b. Repeat for Minority populations
    - c. Analyze the net difference for both categories compared to the thresholds identified in the CAT Title VI policy

**Effects of Proposed Service Changes on Low-Income and Minority Populations**

Table 1 below describes the changes in service levels following elimination of Route 5D and Route 8 and the addition of the two new downtown shuttles. The table estimates populations within a quarter-mile of stops. Totalling the population impacted, a weighted average is calculated to determine the net impact to minority and low-income populations.

*Table 1: Analysis of Service Changes on Low-Income and Minority Populations*

Route	Before				After				Difference	
	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)	Low Income	Minority
5D dot Express	6,115	41.7%	36.8%	10,860					-41.7%	-36.8%
8 Liberty Street Shuttle	2,395	31.5%	25.7%	10,047					-31.5%	-25.7%
Forsyth Loop					5,906	41.7%	30.8%	23,862	41.7%	30.8%
Historic Loop					4,331	37.4%	36.0%	23,862	37.4%	36.0%
All Changes	6,223	41.8%	36.8%	20,907	7,795	44.2%	36.9%	47,724	2.4%	0.1%

According to the table, the existing Route 5D and Route 8 quarter-mile stop transit shed was 41.8% low-income and 36.8% minority. This was replaced by the two new downtown shuttles, with a quarter-mile stop transit shed of 44.2% low-income and 36.9% minority. So, the new routing scheme downtown is serving a higher percentage of low-income populations (+2.4%) and minority populations (+0.1%). Furthermore, the quarter mile stop shed of the new routes include a slightly larger population that than of the existing downtown routes (+1,572).

Low- Income and Minority population maps can be found in the Appendix.

**Disproportionate Burden Analysis**

CAT’s Title VI policy states that a disproportionate burden exists when low-income populations are adversely impacted by 15% or greater. In this case, no adverse impact exists because the service changes are providing a higher percentage of service to low-incomes.

**Disparate Impact Analysis**

CAT’s Title VI policy states that a disparate impact exists when minority populations are adversely impacted by 15% or greater. In this case, no adverse impact exists because the service changes are providing a higher percentage of service to minority populations.

**Public Feedback**

As required in federal guidelines, as well as CAT’s Transit Service Guidelines, the Authority must hold at least one Public Meeting to solicit feedback from the community regarding major service changes.

CAT staff held three public meetings prior to requesting Board approval in an attempt to gather feedback on the proposed service changes. A summary of the meetings is listed below.

- **Public Meeting #1**
  - Date: Wednesday, July 12<sup>th</sup> at 6:00PM
  - Location: Intermodal Transit Center, 610 West Oglethorpe Avenue
  - Attendees: 4
  - Comments: No comments regarding the discontinuation of the existing dot Shuttle and Liberty Shuttle. Other items were discussed.
  
- **Public Meeting #2**
  - Date: Wednesday, August 9<sup>th</sup> at 6:00PM
  - Location: Intermodal Transit Center, 610 West Oglethorpe Avenue
  - Attendees: 7
  - Comments: CAT staff discussed the proposed changes to the downtown routes and provided a handout, which summarized the changes. No comments were received.

**Appendix**

*Figure 1: Existing Route 5D (dot Express) Route Map*

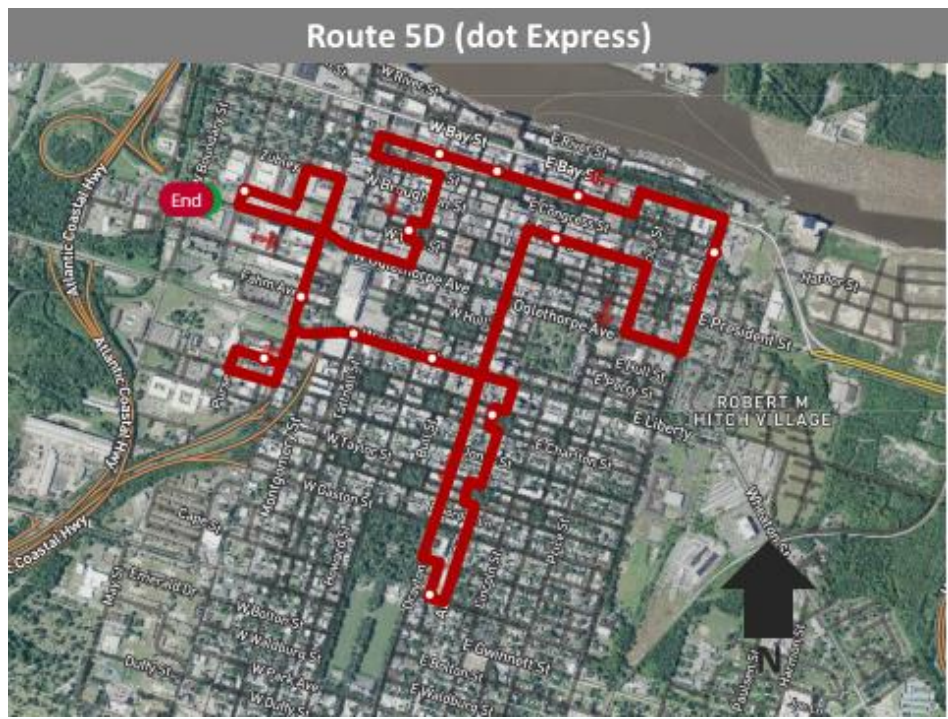


Figure 2: Existing Route 8 (Liberty Shuttle) Route Map

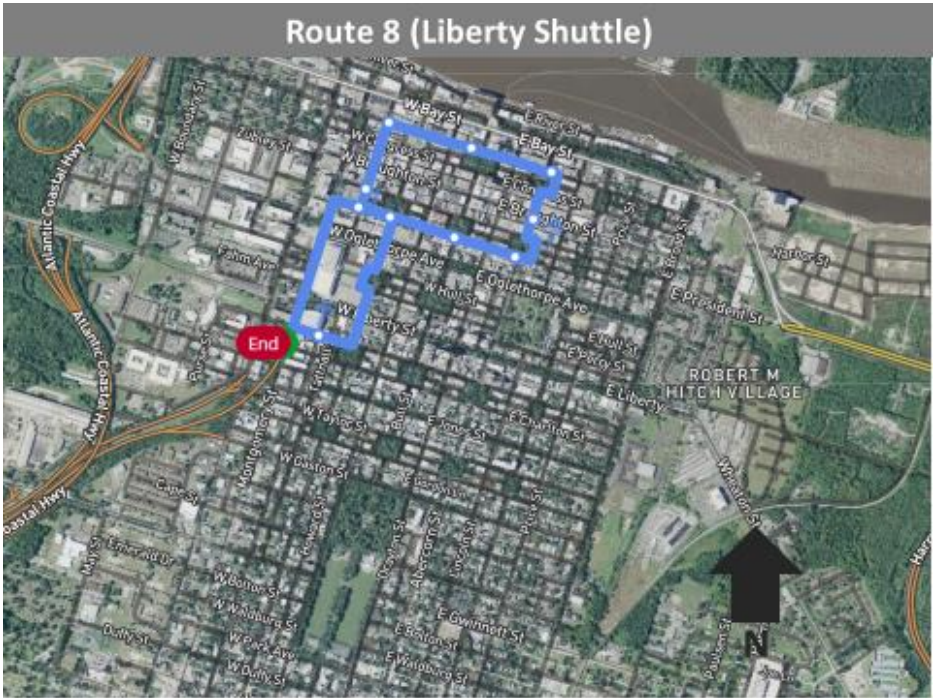


Figure 3: Route 5D Low-Income Map



Figure 4: Route 5D Minority Map

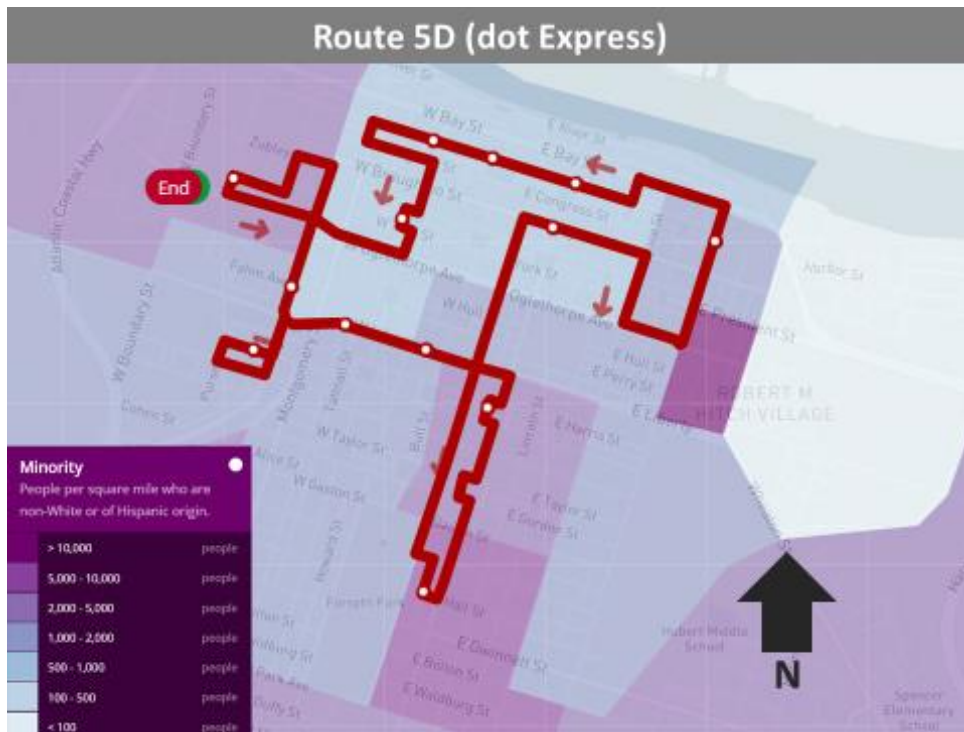


Figure 5: Route 8 Low Income Map



Figure 6: Route 8 Minority Map



Figure 7: Proposed Forsyth Loop Route Map



Figure 8: Proposed Historic Loop Route Map





Figure 11: Proposed Historic Loop Low-Income Map



Figure 12: Proposed Historic Loop Minority Map

# Proposed Historic Loop



# Route 7D Expansion:

## TITLE VI EQUITY ANALYSIS

Routes: 7 (DOT Forsyth Loop, DOT Downtown Loop)

Date: 5/10/2018

Service Change Classification: Expansion of Service (Major)

### Introduction

In 2012 the Federal Transit Administration (FTA) updated its Title VI regulations under Circular 4702.1B, which requires grantees to evaluate service changes and proposed service improvements to determine whether those changes have an adverse impact on minority or low-income populations. As mandated in 4702.1B, Chatham Area Transit (CAT) has a Title VI policy, which offers guidance as to how the authority should prepare an equity analysis in the event of any major service changes. This equity analysis was prepared in consultation with the CAT Title VI policy, as well as FTA Circular 4702.1B.

In 2016, the City of Savannah completed its downtown mobility study titled “Parking Matters.” One of the many recommendations developed through this study included the consolidation of downtown circulators to be more frequent and easier to understand for tourists and residents alike. The consultants who performed the study developed three new downtown routes, which offered frequencies of 10-minutes or better. City of Savannah staff and CAT planning staff modified the proposed routing scheme to develop two new downtown circulators: a north-south loop extending from Bryan Street to Park Avenue and an east-west loop extending from Martin Luther King Boulevard to Price Street.

### Existing Service Levels & Ridership

#### *Route 7 (dot Downtown)*

The dot Downtown Loop currently runs from 7:00AM to 7:00PM on Weekdays, 10:00AM to 7:00PM on Saturdays and 10:00 AM to 6:00 PM on Sundays. The route originates at Johnson Square and circulates through downtown Savannah, making right turns and stops at Price Street, E Liberty St, Martin Luther King Junior Blvd, and E Congress St. This route takes about 15 minutes to complete. Additionally, this service is fully subsidized by the City of Savannah and is offered fare-free to all passengers.

Ridership productivity on the Downtown Loop has continues to grow since its inception in September 2017 with roughly 13 passengers per hour in April 2018. In early 2017, CAT deployed two new trolley vehicles for use on both dot loops. These new vehicles did not come with traditional fareboxes but instead came equipped with Automatic Passenger Counters (APCs). The change in methodology for capturing ridership data along with the change in dot routing has resulted in a significant increase in observed ridership along this route, thus making it difficult for planners to accurately compare recent data to historical data.

#### *Route 7 (dot Forsyth Loop)*

Ridership productivity on the Forsyth Loop has continued to grow since its inception in September 2017 with roughly 40 passengers per hour in April 2018. In early 2017, CAT deployed two new trolley vehicles for use on both dot loops. These new vehicles did not come with traditional fareboxes but instead came equipped with Automatic Passenger Counters (APCs). The change in methodology for capturing ridership data along with the change in dot routing has resulted in a significant increase in observed ridership along this route, thus making it difficult for planners to accurately compare recent data to historical data.

The dot Forsyth Loop currently runs from 7:00AM to 7:00PM on Weekdays, 10:00AM to 7:00PM on Saturdays and 10:00 AM to 6:00 PM on Sundays. The route originates Johnson Square and circulates through downtown Savannah, making left turns and stops at Whitaker St, W Park Ave, Drayton St, and W Bryan St. This route takes about 17 minutes to complete. This service is fully subsidized by the City of Savannah and is offered fare-free to all passengers.

Maps of the existing route 7 (dot Downtown Loop) and 7 (dot Forsyth Loop) can be found in Figures 1 and 2 in the Appendix.

## **Policies**

### *Disproportionate Burden Policy*

CAT's Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations. The threshold is the difference between the burdens borne on low-income populations compared to non-low income populations. Exceeding the threshold means that a fare or service change either negatively impacts low-income populations' more than non-low-income populations or that the change benefits non-low-income populations more than low-income populations.

If the threshold is exceeded, CAT must evaluate whether there is an alternative that has a more equitable impact. CAT will take steps to propose policy to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by low-income populations compared to non-low-income populations.

### *Disparate Impact Policy*

CAT's Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disparate impact on minority populations compared to non-minority populations. Exceeding the threshold means that a fare or service change either negatively impacts minority populations more than non-minority populations or that the change benefits non-minority populations more than minority populations. CAT will take steps to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by minority populations compared to non-minority populations.

## **Methodology**

CAT will be expanding the service hours of the dot shuttles to 7:00 AM – 12:00 AM weekdays, 10:00 AM – 12:00 AM Saturdays, and 10:00 AM – 12:00 AM on Sundays. The shuttles will still have frequencies of 10-minutes or better and be fully subsidized by the City of Savannah.

Per CAT's Title VI policy, Disproportionate Burden and Disparate Impact Analyses are required in this circumstance given that two routes are proposed for discontinuation and two new routes are being proposed for service. Both instances are classified as a Major Service Change, thus triggering the development of an analysis.

Chatham Area Transit (CAT) used Remix ([www.remix.com](http://www.remix.com)) to undertake the Title VI analysis for this project. Remix allows CAT to automatically generate a Title VI Report, using Census data, by comparing existing service to a set of proposed changes. This methodology uses Census Block Group data to analyze the impact to existing populations. The detailed methodology used to achieve this includes the following steps:

3. Get the population near a route, including its low income and minority percentage.
  - a. For each route, build a shape that represents the area within quarter mile of any of its stops.
  - b. Intersect the catchment area with 2010 (2017 Estimate) ACS Census data. Get a list of block groups and the percentage overlap with each.
  - c. For each block group, take the percentage of overlap and multiply it by the block group’s statistics.
  - d. Get the population, minority population, and low income population for each group and sum them together. This is the total population a route could serve.
4. Compare the service population percentage change in impacted Census Groups
  - a. Subtract the “Before” percentage from the “After” percentage for Low-Income populations
  - b. Repeat for Minority populations
  - c. Analyze the net difference for both categories compared to the thresholds identified in the CAT Title VI policy

**Effects of Proposed Service Changes on Low-Income and Minority Populations**

Table 1 below describes the changes in service levels before and after the additional hours are added. The table estimates populations within a quarter- mile of stops. Totaling the population impacted, a weighted average is calculated to determine the net impact to minority and low-income populations.

	Before				After				Difference	
Route	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)	Low Income	Minority
Forsyth Loop	5,811	37.2%	32.0%	24,335	5,811	37.2%	32.0%	34,625	0.0%	0.0%
Downtown Loop	4,039	34.0%	36.0%	24,335	4,039	34.0%	36.0%	34,625	0.0%	0.0%
All Changes	7,525	39.1%	37.2%	48,670	7,525	39.1%	37.2%	69,250	0.0%	0.0%

*Table 1: Analysis of Service Changes on Low-Income and Minority Populations*

According to the table, the Downtown loops quarter-mile stop transit shed was 34.0% low-income and 36.0% minority. The Forsyth loop’s quarter-mile stop transit shed was 37.2% low-income and 32.0% minority. Together, the routes had a quarter-mile stop transit shed of 39.1% low-income and 37.2% minority. There are no changes being made to the routing of these routes, just the span of their service.

Low- Income and Minority population maps can be found in the Appendix.

**Disproportionate Burden Analysis**

CAT’s Title VI policy states that a disproportionate burden exists when low-income populations are adversely impacted by 15% or greater. In this case, no adverse impact exists because the service changes are providing the same share of service to persons of low income before and after the change.

**Disparate Impact Analysis**

CAT's Title VI policy states that a disparate impact exists when minority populations are adversely impacted by 15% or greater. In this case, no adverse impact exists because the service changes are providing the same share of service to minorities before and after the change.

**Public Feedback**

As required in federal guidelines, as well as CAT's Transit Service Guidelines, the Authority must hold at least one Public Meeting to solicit feedback from the community regarding major service changes.

CAT staff held one public meeting prior to requesting Board approval in an attempt to gather feedback on the proposed service changes. A summary of the meeting is listed below.

- Date: Wednesday, May 9<sup>th</sup> at 5:30 PM
- Location: Intermodal Transit Center, 610 West Oglethorpe Avenue
- Attendees: 6
- Comments: No comments regarding the added hours to the dot routes.

**Appendix**

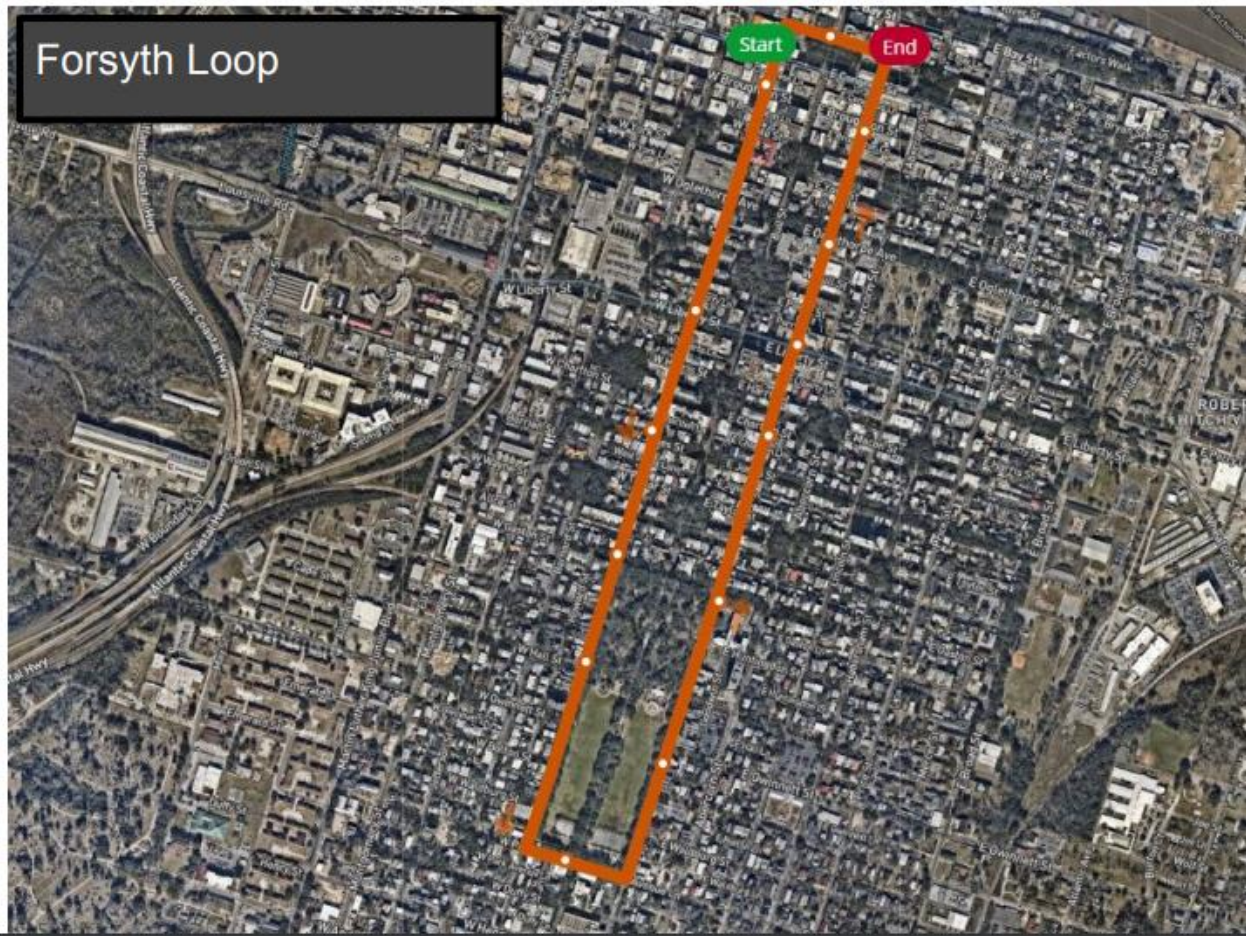


Figure 1: Existing Route 7 (dot Forsyth) Route Map

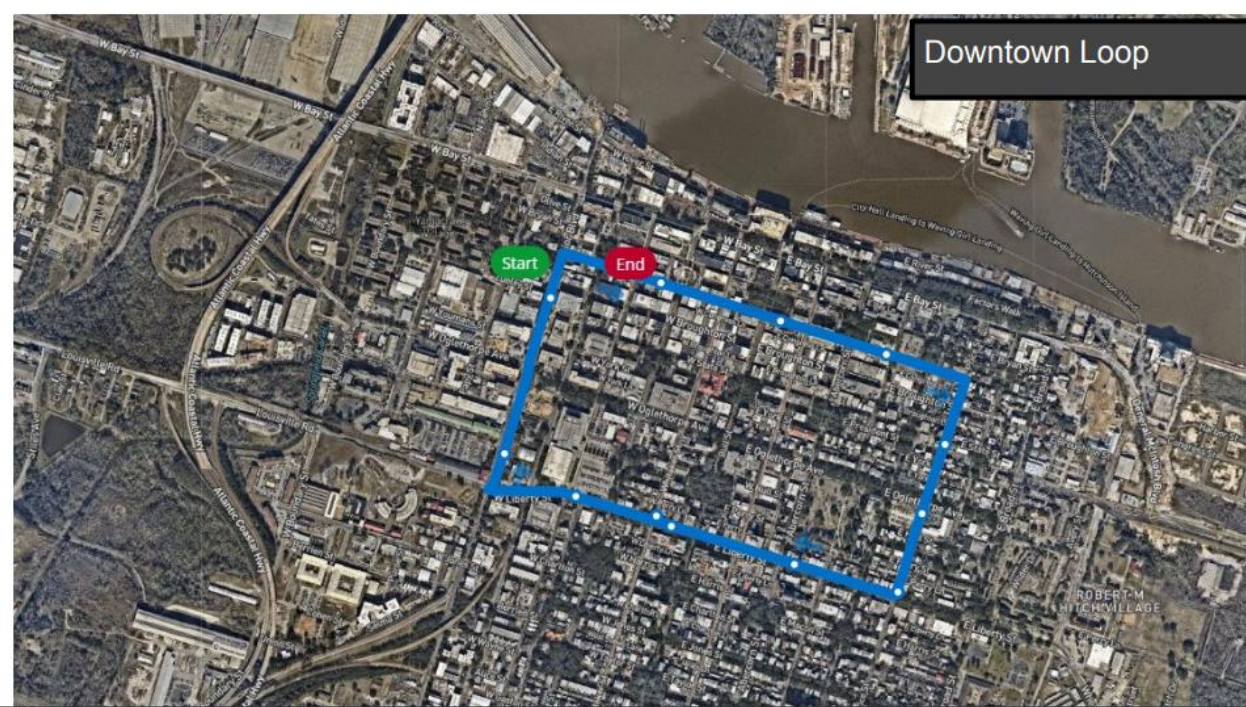


Figure 2: Existing Route 7 (Historic Loop) Route Map

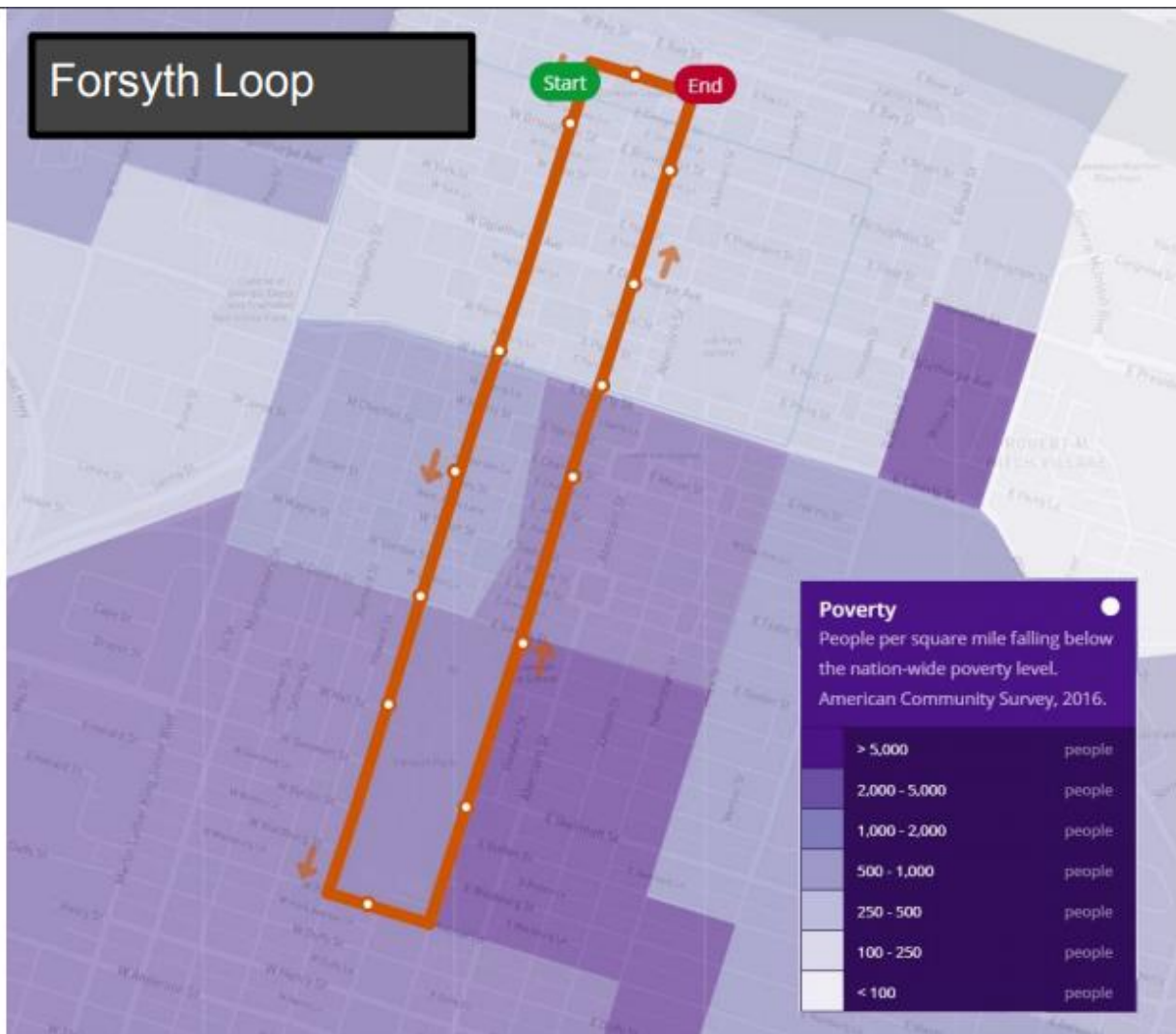


Figure 3: Forsyth Loop: Impoverished persons per square mile

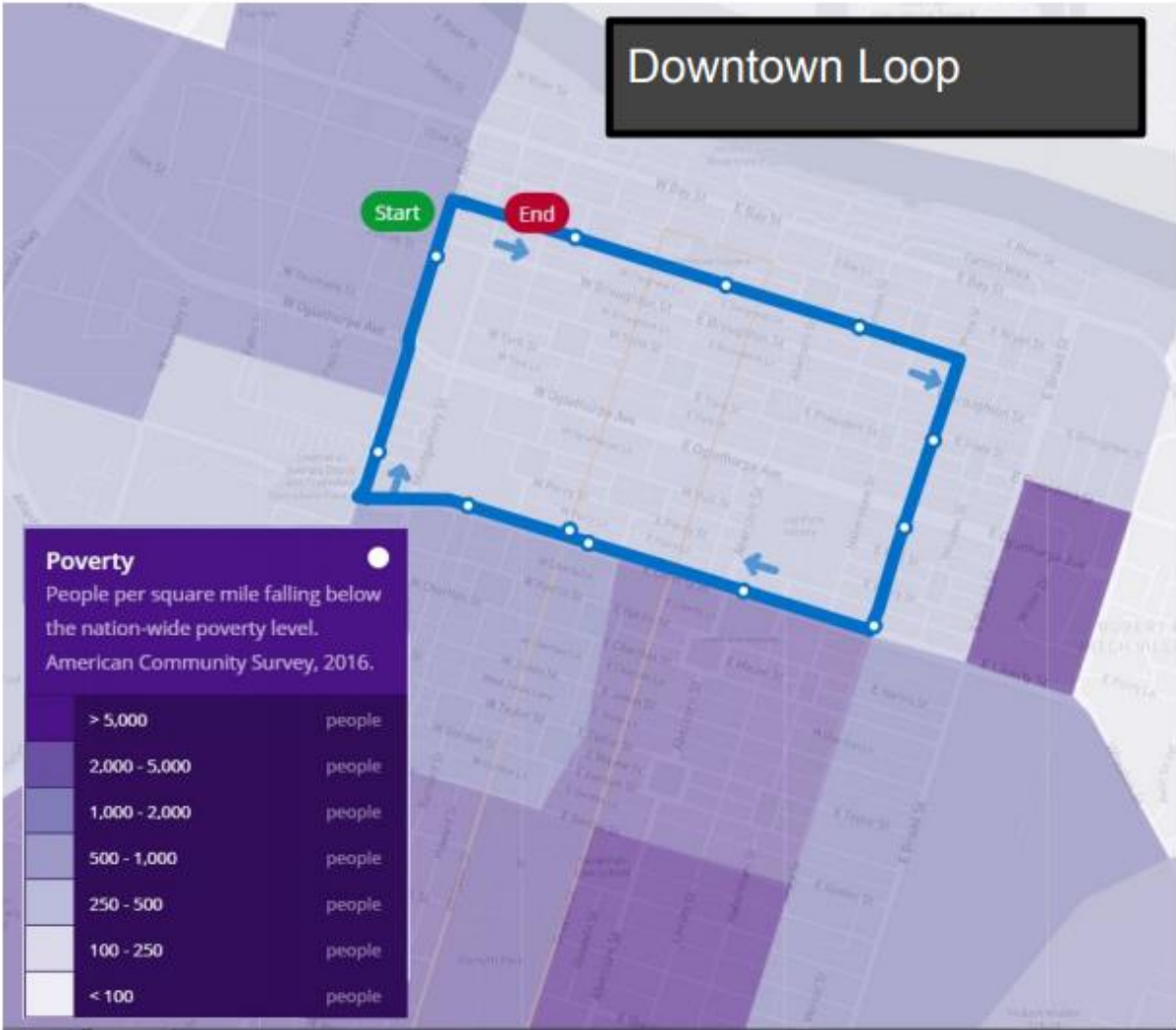


Figure 4: Downtown Loop: Impoverished persons per square mile



Figure 5: Forsyth Loop - Non-White or Hispanic peoples per square mile

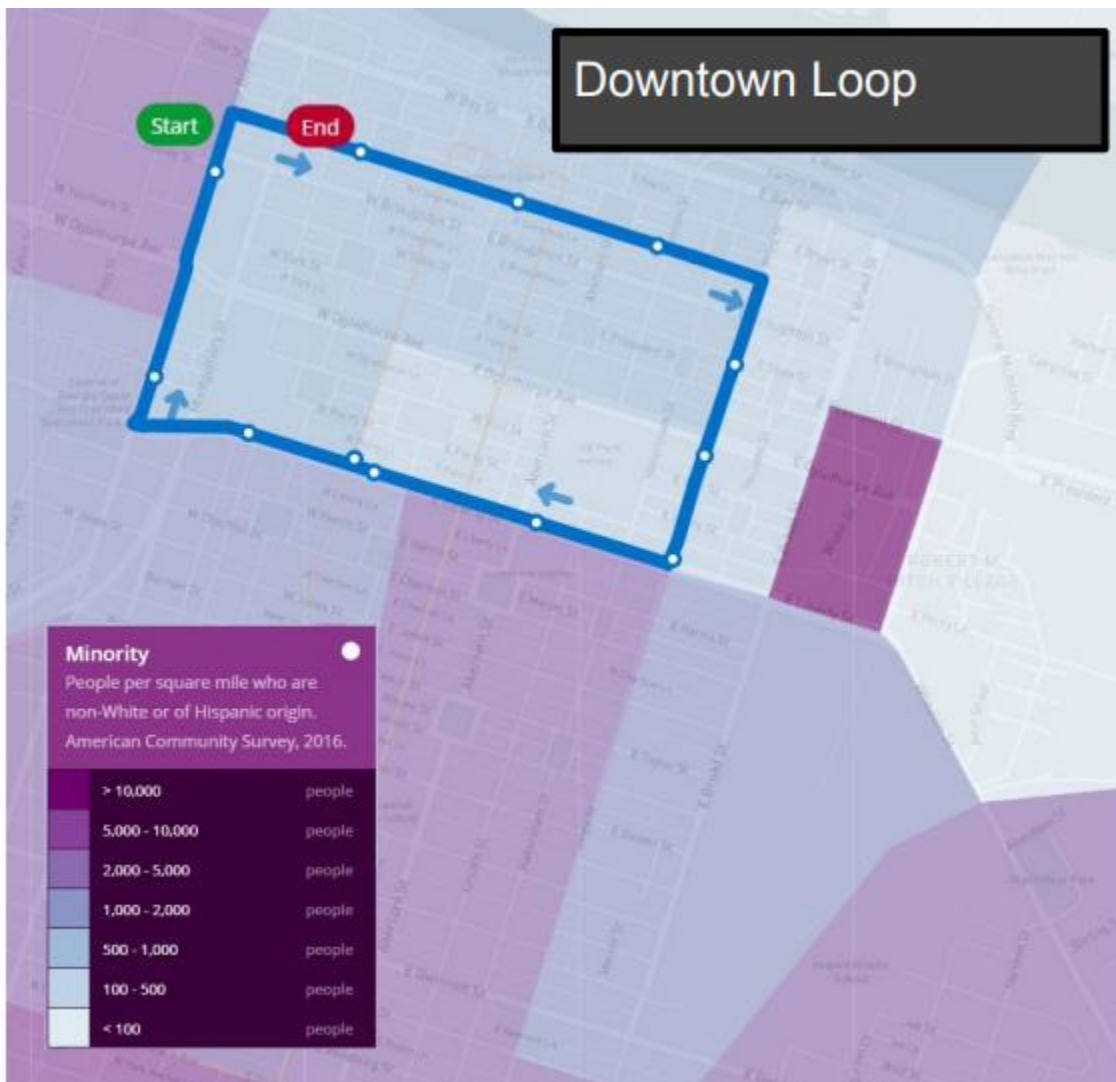


Figure 6: Downtown Loop - Non-White or Hispanic peoples per square mile

# Appendix L

## Board Approval of Title VI Plan

**(Board minutes excerpt beginning on Page 15 with approval on Page 18)**

Second.

Chair Liakakis: We have a motion on the floor for the MoU between CAT and CORE. All in favor signify by saying, aye.

Board: Aye.

Chair Liakakis: All opposed? Motion carries.

Item six, Title VI Plan. Curtis?

Mr. Koleber: Thank you, Mr. Chairman. Staff request board approve the Chatham Area Transit Authority Title VI Plan, as advised. The FTA requires the board of directors to approve the Title VI Plan. Each-three year period CAT submits an updated plan to the FTA. Our current plan was set to expire on November 30, 2016. We have updated it and sent it out to FTA on November 15. It's currently under review. Final approval will be given by the FTA, but it has to be after the board approves the revised plan.

Mr. Durrence: On page 9, and that might actually not be the right page. One of the things I noticed in reading through some of this is the restrictions that it places on us on being able to change routes in some cases, because we're serving certain populations. Not that we have much choice, I suspect, but how much does this impact what we want to do with changing, based on our ridership studies? Are we going to wind up in court cases about being able to change our routes?

Mr. Koleber: I don't think we would do something that would require us to go to court, but publicly, we have to certainly do a Title VI analysis to make sure that the routes that we do change still comply with the law.

Mr. Durrence: I guess that's more my question. Not in a court case so much, but in our goal to try to create a more effective route system, are we going to be hamstrung by something like this? Again, not that we have much choice about doing this, but is that going to create routing problems?

Mr. Koleber: It's hard to say right now, because we haven't analyzed it, and we haven't looked at what changes will be necessary. The point of view of the Title VI analysis would allow us to see what impacts it does have, and then we could make decisions at that point. I don't want to speculate how much it would restrict us right now.

Chair Liakakis: Wayne, and then you.

Mr. Dawson: I think from the past, whenever we wanted to do minor changes, minor alterations, that wouldn't trigger the public hearing, the public ...

Mr. Koleber: No you have to change 25% of a route or eliminating an entire route.

Mr. Dawson: Or creating a new route.

Mr. Koleber: Does trigger public meetings. There's a backwards calendar. You have to do a certain amount of time frame. You do the meetings before you do the changes. Chatham Area Transit Authority Regular Board Meeting December 13, 2016 Page **16** of **39**

Mr. Dawson: Right. It would restrict us in the sense that maybe we would have to get it through an additional process, which might delay implementing something new. It doesn't preclude our being able to do that, if I'm understanding this right.

Mr. Koleber: To some extent, it does. We can't shift all of our routes to areas, and then totally not serve a certain segment of the population. We can't necessarily do that. It has to be equitable. That's why the analysis is required, and we have public hearings, and all that. To answer your question, we can change routes, yes.

Mr. Dawson: Right. We want to make sure that it doesn't have a disproportionate impact on any particular population if we do so. It gives the chance for the public to have input into the process.

Mr. Koleber: Yes, sir.

Mr. Dawson: Bill?

Mr. Broker: I think, basically, it's just designed to keep us honest. Is that ...

Mr. Koleber: The FTA requires us to make sure that we're in concert with the public when we do major changes that's going impact them. To allow that, to have that opportunity for them to go to the public meetings, voice their concerns, and for us to do the analysis, so that we can show that we did our due diligence and we went through it.

Mr. Broker: Right. I would assume that any plan that we submitted to the FTA would require some sort of equity analysis, and that kind of thing.

Mr. Koleber: Absolutely.

Mr. Broker: In order for FTA to approve it.

Mr. Koleber: Right.

Mr. Broker: Just to move to something else, would this have an impact on the announcements as to major intersections or major stops that are being approached in terms of using languages other than English in our announcements?

Mr. Koleber: I don't necessarily think that it would have to do with that.

Mr. Broker: I notice there's a lot of others do limited English proficiency.

Mr. Koleber: Yes, there is.

Mr. Broker: I'm curious as to whether that's been thought about in the context of this plan. It doesn't cobble us, in terms of the consideration today, but that came to mind when I was reading through this, because I don't think we do announce any stops in any language other than English.

Mr. Koleber: Right. Yes, that's correct. Chatham Area Transit Authority Regular Board Meeting December 13, 2016 Page

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Mr. Broker: It might be something that we can look at.

Mr. Koleber: Sure.

Chair Liakakis: Helen and then Bill.

Ms. Stone: Just really quickly, reading through, the financial requirements for a lot of this language stuff concerns me. Do we receive any grant money for any of that? Is there anything available to help offset some of these requirements?

Mr. Sparks: It's general 5307 grant that we get.

Ms. Stone: I understand, but it was rather massive.

Mr. Broker: We just don't get the grant money, people.

Ms. Stone: I mean, it was rather massive, what the requirements were, especially language barriers.

Also, just one grammatical error on page 7, when it says, The CAT staff have, instead of has.

Mr. Broker: Page what? 7?

Ms. Stone: Page 7, mid-way down. Mid-way down it says, "CAT staff have identified" instead of has identified. I just don't want us to not work on it.

Mr. Broker: To be confusing singulars with our plurals.

Ms. Stone: Exactly.

Mr. Broker: I'm with you.

You're speaking English as a second language.

Ms. Stone: No, it's just I think, if we have a document, it should be written properly.

Mr. Durrence: I absolutely agree.

My question, I fully anticipate, dependent on our ridership study and adjusting the routes, we are going to beyond that 25% point. I could be wrong. What we've seen with the ridership studies, I think we're going to see something more than 25% change in routes. How much time, once we decide we want to change some stuff ... We're talking about having this data late spring. How long is it going to take us to go through all these hearings and things. How much time is that going to add before we actually get to go through a new routing system?

Mr. Sparks: The timeline's going to be tight. Once the original destination study is complete, we're thinking at the end of April, probably, for that. We probably need two to three months to go through all the public hearings and solicit input. I think the original idea was to have the changes go into effect in July, Chatham Area Transit

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but we're going to be cutting it real close. If not July, we have to look at whether we want to do that in November.

Mr. Durrence: Or after July, or before then.

Mr. Sparks: Yes.

Chair Liakakis: Have we been doing the LEP when this situation has come in the past?

Ms. Harrison: Yes, sir.

Chair Liakakis: We have a positive situation then, where the LEP understand the particular issue?

Ms. Harrison: Yes, sir.

Chair Liakakis: Okay. All right.

Mr. Durrence: Pardon my frustrations with the fact that we inadvertently are going to have to look at another 6-10 months of these numbers before we can do anything.

Mr. Dawson: The LEP provisions that are here seem like they're rather onerous, the requirements seem rather onerous, but with technology as it is today, I think it's become less onerous as time goes on.

Ms. Stone: Well, you're right. It's just that it's massive. When I was reading through this, I had no idea of some of the federal requirements.

Ms. Harrison: It's one of many components that is a requirement to receive the federal funds. We have staff resources dedicated to that type of compliance. You're right.

Mr. Dawson: The second thing is, is that goal, Grant, I guess, is to have it come into effect for the next budget year?

Mr. Sparks: That would be the goal, yes.

Mr. Dawson: Would be able to implement it if everything falls into place.

Chair Liakakis: Okay, we need a motion on this, for item six, the Title VI plan.

Mr. Broker: So moved.

Ms. Stone: Second.

Chair Liakakis: I have a motion on the floor and a second. All in favor signify saying, aye.

Board: Aye.

Chair Liakakis: All opposed? Plan's approved.