



Cherokee Area Transportation System



Title VI Plan



Date Adopted: 10/19/21

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
	Adoption by Cherokee County Board of Commissioners	Harry B Johnston	Pending approval by GDOT
6/20/19	GDOT review of final draft	Michele Nystrom	GDOT concurrence letter – final draft
08/06/19	Adoption by Cherokee County Board of Commissioners	Harry B Johnston	Signed
10/19/21	Adoption by Cherokee County Board of Commissioners	Harry B Johnston	Signed
10/25/21	GDOT review of final draft	Patricia Smith	GDOT concurrence letter – final draft

Title VI Plan Activity Log
(Continued)

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan..... 1-1

2.0 Introduction & Description of Services 2-1

 2.1 First Time Applicant Requirements 2-2

 2.2 Annual Certifications and Assurances..... 2-2

 2.3 Title VI Plan Concurrence and Adoption..... 2-2

3.0 Title VI Notice to the Public 3-1

 3.1 Notice to Public..... 3-1

 3.2 Notice Posting Locations..... 3-1

4.0 Title VI Procedures and Compliance 4-2

 4.1 Complaint Procedure 4-2

 4.2 Complaint Form 4-2

 4.3 Record Retention and Reporting Policy..... 4-2

 4.4 Sub-recipient Assistance and Monitoring..... 4-3

 4.5 Contractors and Subcontractors..... 4-3

5.0 Title VI Investigations, Complaints, and Lawsuits 5-5

6.0 Public Participation Plan 6-6

7.0 Language Assistance Plan 7-7

8.0 Transit Planning and Advisory Bodies..... 8-8

9.0 Title VI Equity Analysis..... 9-9

10.0 System-Wide Service Standards and Service Policies 10-10

 10.1 Service Standards..... 10-10

 10.2 Service Policies..... 10-11

11.0 Appendices..... 11-12

APPENDIX A FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS

APPENDIX B CURRENT SYSTEM DESCRIPTION

APPENDIX C TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER

APPENDIX D TITLE VI SAMPLE NOTICE TO PUBLIC

APPENDIX E TITLE VI COMPLAINT FORM

APPENDIX F PUBLIC PARTICIPATION PLAN

APPENDIX G LANGUAGE ASSISTANCE PLAN

APPENDIX H OPERATING AREA LANGUAGE DATA: CHEROKEE AREA TRANSPORTATION SYSTEM SERVICE AREA

APPENDIX I DEMOGRAPHIC MAPS

APPENDIX J TITLE VI EQUITY ANALYSIS

APPENDIX K TEXT FORMATTING PALETTE

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Cherokee Area Transportation System assures the Georgia Department of Transportation that no person shall on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Cherokee Area Transportation System further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Cherokee Area Transportation System.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature: _____

Printed Name: _____

Harry Johnston/Chairman, Cherokee County Board of Commissioners, Date:10/21/2021

2.0 Introduction & Description of Services

Cherokee Area Transportation System submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Cherokee Area Transportation System is a sub-recipient of FTA funds and provides service in Cherokee County. A description of the current Cherokee Area Transportation System is included in Appendix B.

Title VI Liaison

Greg Powell, Director of Transportation
Cherokee County Board of Commissioners
770-345-1800
884 Univeter Road, Canton, GA 30115

Alternate Title VI Contact

Kristy Johnson, Office Manager
Cherokee County Board of Commissioners
770-345-1100
884 Univeter Road, Canton, GA 30115

Cherokee Area Transportation System must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, color and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

Cherokee Area Transportation System is not a first-time applicant for FTA/GDOT funding. The following is a summary of Cherokee Area Transportation System's current and pending federal and state funding.

During the previous three years, Federal Agency or State Agency name did not complete a Title VI compliance review of Cherokee Area Transportation System. Cherokee Area Transportation System has not been found to be in noncompliance with any civil rights requirements.

2.2 Annual Certifications and Assurances

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Cherokee Area Transportation System will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on 10/25/21. The Plan was approved and adopted by Cherokee Area Transportation System's Board of Commissioners during a meeting held on 10/19/21. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

The notice is included in Appendix D of this Plan. The notice is translated into other languages, as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Cherokee Area Transportation System's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Cherokee Area Transportation System's office(s) including the reception desk and driver's room, and on the Cherokee Area Transportation System's website at cherokeega.com/transportation. Additionally, Cherokee Area Transportation System will post the notice at on transit vehicles.

A sample version of this notice is included in Appendix D of this Plan.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Cherokee Area Transportation System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Cherokee Area Transportation System investigates complaints received no more than 180 days after the alleged incident. Cherokee Area Transportation System will process complaints that are complete.

Once the complaint is received, Cherokee Area Transportation System will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Cherokee Area Transportation System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Cherokee Area Transportation System may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, Cherokee Area Transportation System can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on Cherokee Area Transportation System's website (www.cherokeega.com/transportation).

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Cherokee Area Transportation System's website (www.cherokeega.com/transportation).

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Cherokee Area Transportation System will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

The Title VI Plan will be submitted to all primary recipients, as needed. Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Sub-recipient Assistance and Monitoring

Cherokee Area Transportation System does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, Cherokee Area Transportation System utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if Cherokee Area Transportation System has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

4.5 Sub recipients and Subcontractors

Cherokee Area Transportation System is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Cherokee Area Transportation System, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") 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 Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, in the selection and retention of subcontractors, including procurements of materials 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 Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or

supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis 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 the *Georgia Department of Transportation and/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 the *Georgia Department of Transportation, and/or the Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Cherokee Area Transportation System shall impose contract sanctions as 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 procurement 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 the Cherokee Area Transportation System, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a condition of your agreement with GDOT, Cherokee Area Transportation System and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Cherokee Area Transportation System and its contractor and subcontractors shall not discriminate on the basis of race, color, or national origin in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

As a condition of your agreement with GDOT, vendors and contractors of Cherokee Area Transportation System shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with Cherokee Area Transportation System. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Cherokee Area Transportation System shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for Cherokee Area

Transportation System. The Cherokee County Human Resources Center participates in the E-Verify System ~ # 47188 as of July 7, 2007.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Cherokee Area Transportation System must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Cherokee Area Transportation System in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to GDOT and/or FTA.

Cherokee Area Transportation System has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	0			
1.				
2.				
Lawsuits	0			
1.				
2.				
Complaints	0			
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Cherokee Area Transportation System was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Cherokee Area Transportation System. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Cherokee Area Transportation System services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

Cherokee Area Transportation System is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Cherokee Area Transportation System's recent, current, and planned outreached activities.

- Survey on both on Demand Response and Fixed Routes annually
- Held a public meeting on changes to the Canton Fixed Route and received input
- Legal advertisements in local newspapers

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Cherokee Area Transportation System operates a transit system within Cherokee County. The Language Assistance Plan (LAP) has been prepared to address Cherokee Area Transportation System's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Cherokee Area Transportation System service area there are 258,773 residents or 4% who describe themselves as not able to communicate in English very well (Source: 2019 US Census). Cherokee Area Transportation System is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Cherokee Area Transportation System has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Cherokee Area Transportation System does not have a transit-related committee or board, therefore this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, Cherokee Area Transportation System will ensure the following:

1. Cherokee Area Transportation System will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Cherokee Area Transportation System will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, Cherokee Area Transportation System will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If Cherokee Area Transportation System determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Cherokee Area Transportation System may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Cherokee Area Transportation System must demonstrate and document how both tests are met. Cherokee Area Transportation System will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Cherokee Area Transportation System has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Cherokee Area Transportation System does not have any Title VI Equity Analysis reports to submit with this Plan. Cherokee Area Transportation System will utilize the demographic maps included in Appendix I for future Title VI analysis.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Cherokee Area Transportation System is a fixed route service provider.

FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

Cherokee Area Transportation System has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

10.1 Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. Cherokee Area Transportation System has prepared standards for all modes it operates including Paratransit Service.

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			Maximum Load Factor
	Seated	Standing	Total	
15' Mini-Bus	--	--	--	--
40' Low Floor Bus	--	--	--	--
40' Standard Bus	44	16	60	1.4
Light Rail Vehicle	--	--	--	--

b. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION				
WEEKDAY	Peak	Base	Evening	Night

Regional Trunk	--	--	--	--
Urban Radial	--	60	--	--
Cross-Town	--	--	--	--
Secondary Radial	--	--	--	--
Feeder	--	--	--	--
Peak Express	--	--	--	--
Employer Feeder	--	--	--	--
<p><i>* Peak: 7-9 am and 4-6 pm; Base 8am - 4pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight;</i></p> <p><i>"--" means no service is provided during that time period.</i></p>				

- c. **On-Time Performance**
 A vehicle is considered on time if it departs a scheduled time point no more than zero (0) minute early and no more than five (5) minutes late. The Cherokee Area Transportation System on-time performance objective is 90% or greater. Cherokee Area Transportation System continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.
- d. **Service Availability**
 Cherokee Area Transportation System will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service.

10.2 Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. Cherokee Area Transportation System has prepared the following policies for its transit system.

- a. **Distribution of Transit Amenities**
 Installation of transit amenities along bus routes are based on the number of passengers boarding at stops and stations along those routes.
- b. **Vehicle Assignment**
 Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned non-CDL bus rather than a CDL bus . Some routes requiring tight turns on narrow streets are operated with non-CDL buses.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: CHEROKEE AREA TRANSPORTATION SYSTEM SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS
APPENDIX K	TEXT FORMATTING PALETTE

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.**
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
- Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

Appendix B

Current System Description

Current System Description

1. Cherokee Area Transportation System's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.
2. Cherokee Area Transportation System is a non-profit 501(c)(3) organization. Our organization is made up of 17 full-time employees, 7 part-time employees, and no volunteers. Our Director of Transportation is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Our BCC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. Transportation services are provided in accordance with the BCC's approved Operations Manual/System Safety/Security Program. We will continue to operate at previous year (2019) service hours averaging 128 total fleet service hours per day or approximately 38,400 annual service hours (assuming 300 operating days).
3. Cherokee Area Transportation System's Mobility Coordinator is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 45 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Director of Transportation is responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Manager's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
4. Maintenance on all agency vehicles is provided by Cherokee County Fleet Maintenance Department. Cherokee County Fleet Maintenance Department employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 884 Univeter Rd Canton, GA 30115 and are maintained by the Director of Transportation. All records are maintained and retained for a minimum of four (4) years.
5. Our transportation department has a total of 24 employees that include: 12 full-time drivers, 7 part-time drivers, 3 administrators and 2 support staff.
6. Only Cherokee Area Transportation System employees that have completed all of the required safety and drivers training requirements will be allowed to drive the Transportation agency vehicles. Currently half our drivers are required to carry a Commercial Driver's License. This allows coverage of

all of the larger vehicles and for the opportunity for the other drivers to fill in on service routes with the larger vehicles.

7. Transportation services provided through our program are available to the citizens of Cherokee County. Our service incorporates both Demand Response and Fixed route services. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes cutaway buses. 16 of our vehicles are equipped for wheelchair service. We prioritize grouping trips and multi-loading to the maximum extent possible. We make 350 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter



Russell R. McMurry, P.E., Commissioner
One Georgia Center
600 West Peachtree NW
Atlanta, GA 30308
(404) 631-1990 Main Office

October 25, 2021

Greg Powell
Cherokee Area Transportation System (CATS)
884 Univeter Rd
Canton, GA 30115

Dear Mr. Powell,

The Department has completed its review of your Title VI Plan and has determined that it meets the requirements established in the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

Thank you for your ongoing cooperation and compliance of the FTA Civil Rights Program requirements. Should you need assistance or have any questions, please do not hesitate to contact Ashley Finch, Rail/Transit Planner directly at afinch@dot.ga.gov or (470) 432-1751.

Sincerely,

Patricia Smith
Transit Program Manager
Division of Intermodal



Cherokee County Board of Commissioners MINUTES

**October 19, 2021
Regular Meeting
Cherokee County Admin Complex, CONFERENCE CENTER, 1130 Bluffs Pkwy., Canton GA 30114 6:00 PM**

INVOCATION

Cliff Pace with Canton First Baptist will give the invocation.

Cliff Pace was not present.

Greg Elder gave the invocation.

PLEDGE OF ALLEGIANCE

Chairman Johnston led the Pledge of Allegiance.

"Veterans of U.S. military service may proudly salute the flag while not in uniform based on a change in the governing law on 25 July 2007"

1. CALL TO ORDER

Chairman Johnston called the meeting to order at 6:03 p.m. Those present included Commissioner Steve West; Commissioner Richard Weatherby; Commissioner Benny Carter; Commissioner Corey Ragsdale; County Attorney, Chris Hamilton; County Manager, Geoff Morton; and County Clerk, Christy Black. Also present were Agency Directors/Department Heads, the media and the public.

2. RATIFY CLOSURE OF EXECUTIVE SESSION

Corey Ragsdale made a motion to ratify closure of Executive Session; Benny Carter seconded. The resulting vote was Passed, 5-0.

3. AMENDMENTS TO AGENDA

3.1. Remove Item 8.1 - Public Hearing / CPL Architecture, Engineering and Planning - Evans Cook Road.

Chairman Johnston asked if anyone was here for the Public Hearing. No one came forward. Richard Weatherby made a motion to amend the agenda; Benny Carter seconded. The resulting vote was Passed, 5-0.

4. PRESENTATIONS/PROCLAMATIONS

4.1. World Polio Rotary Proclamation.

Proclaim World Polio Day as October 24, 2021 in Cherokee County.

Chairman Johnston presented the proclamation to Greg Elder with Canton Rotary, and Robin Wright with Towne Lake Rotary.

Mr. Wright gave his thanks to the Board of Commissioners for all that they do, and that they work with various clubs like Rotary Club to make an impact in the community. He stated that his club meets every Thursday at noon.

Mr. Elder stated that his club meets every Tuesday at noon, and invited the audience to attend one of their meetings.

5. **ANNOUNCEMENTS**

6. **COMMISSION BUSINESS**

6.1. Chairman Johnston - Discussion and possible adoption of 2022 Board of Commissioners Meeting Schedule.

Chairman Johnston stated that the schedule as presented shows no deviation from the usual schedule of the first and third Tuesday of each month.

Richard Weatherby made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

7. **APPROVAL OF MINUTES**

7.1. Minutes from October 5, 2021.

Consider approval of Work Session, Executive Session and Regular Meeting Minutes from October 5, 2021.

Benny Carter made a motion to approve; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

8. **PUBLIC HEARING**

8.1. Amendment: Remove Item from Agenda. Applicant requested two-month postponement.

Appeal of ZBA Case # 21-07-051V - CPL Architecture, Engineering, Planning - BOC District 1.

Hold a public hearing on an appeal of ZBA Case # 21-07-051V filed by CPL Architecture, Engineering, Planning.

Item was removed from the agenda, no public hearing was held.

8.2. Public Hearing on revisions to the Zoning Connections Matrix in the 2018 Comprehensive Plan.

Hold a public hearing to consider changes to the Zoning Connections Matrix.

Benny Carter made a motion to open the Public Hearing at 6:11 p.m.; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

Planning Manager, Margaret Stallings, presented the revisions to the Zoning Connection Matrix in the 2018 Comprehensive Plan. Highlights from the presentation include the following:

- Regional Center

- Description: Hub of retail, restaurants, offices and high-density residential developed in a Main Street layout.
 - Primary Land Uses:
 - Large-scale retail
 - Regional and professional uses
 - Entertainment, restaurant, cultural uses
 - Mixed-use
 - Secondary Land Uses:
 - Dense Residential
- Workplace Center
 - Description: Major employment area including professional and corporate offices, regional offices and light industrial buildings.
 - Primary Land Uses:
 - Office buildings and complexes
 - Light industrial/manufacturing and warehousing
 - Mixed-use
 - Secondary Land Uses:
 - Retail and services
 - Residential (only in mixed-use development)
- Development Corridor
 - Description: To provide link between existing developed areas around major intersections and allow for cohesive layout of businesses.
 - Primary Land Uses:
 - Retail/Commercial centers
 - Commercial amenities
 - Professional services
 - Office buildings
 - Secondary Land Uses:
 - Local institutions - Churches and schools
 - Residential - Townhomes and Multi-family

Chairman Johnston stated that no one signed up to speak and asked if anyone would like to come forward to speak.

1. Tom Ware stated that he felt RD-3 in Suburban Living should not be in the same category as R-40 and R-30. He stated that RD-3 is in other categories that are a better fit, and asked the Board to consider changing that item.

2. Kaj Savenius stated that Country Estates only has AG Zoning District per this updated matrix. He stated that R-80 should be considered a Country Estates Character Area.

Mrs. Stallings stated that R-80 should be included in the Country Estates Character Area, and that they will fix that item on the matrix.

Chairman Johnston asked if anyone else would like to come forward to speak. No one came forward to speak.

Benny Carter made a motion to close the Public Hearing at 6:20 p.m.; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

Chairman Johnston stated that Country Estates should be added to R-80 as a primary use. He stated that another suggestion was to remove RD-3 as a primary use for Neighborhood Living.

Mrs. Stallings stated that there is supposed to be some overlap between the Zoning Districts and Character Areas particularly between Country Estates, Suburban Growth, Suburban Living, and Neighborhood Living. She stated that she is hesitant to exclude RD-3

from Neighborhood Living as it would not match the residential density shown on the matrix.

Commissioner Ragsdale stated that it is all about the density. He stated that one category picks up where the other category left off and so on. He stated that it would be different to change the density of RD-3.

Mrs. Stallings stated that changing the density would mean changing the definition in another part of the Comprehensive Plan which is a bigger revision.

Chairman Johnston stated that RD-3 and R-15 are similar but the lot size and design guidelines are different.

Commissioner Carter asked if this decision was postponed, would there need to be another hearing.

Mrs. Stallings stated that the Board would probably need to hold another public hearing, as there would be several more pages added to the amendment and resolution.

Commissioner Carter asked if Mrs. Stallings would need to change the written parts and the description regarding RD-3.

Mrs. Stallings stated that was correct.

Commissioner Ragsdale stated that it would be a question of if the Board wants to change the density of RD-3.

Mrs. Stallings stated that was correct.

Commissioner Ragsdale stated that based on density, RD-3 fits in Suburban Living which is 1 - 3 dua, and at the bottom end of Neighborhood Living which is 3-8 dua. He stated that based on the County Ordinance today, RD-3 fits both Character Areas.

Commissioner West stated that it may be worth postponing to look at it for the next couple of weeks.

Mrs. Stallings stated that it would have to be in four (4) weeks, as she would need enough time to advertise for another public hearing.

Commissioner West stated that the Board could approve it as is and amend it later if it becomes an issue.

Chairman Johnston stated that they could potentially leave the density for the Character Areas the same, and change that RD-3 only be under Neighborhood Living.

Commissioner Ragsdale stated that it would not be as simple as that because the description and density of Suburban Living would have to be changed to less than 3 dua.

Community Development Agency Director, Brantley Day, stated that one of the challenges is that the market is racing right now at a pace we have not seen. He stated that there is an urgent need to make sure we nail this down as soon as possible. He stated that this is the clarification of the Comprehensive Plan as intended. He stated that Suburban Living tends to be areas that border the cities. He suggested that if everything else but the RD-3 is fine, then approve it as is. He stated that staff could further study RD-3 and come back to the Board to amend it again if needed. He stated that staff will need to look into what changing RD-3 would do to other Character Areas or Zoning Districts.

Chairman Johnston stated that the recommendation is to approve as is and possibly come back to change RD-3 if it becomes an issue.

Steve West made a motion to approve as is and continue conversations about RD-3.

Mrs. Stallings asked if the motion could be amended to include adding R-80 to the Country Estates Character Area.

Steve West amended his motion to approve as is, add R-80 to the Country Estates Character Area, and continue conversations about RD-3; Benny Carter seconded.

Commissioner Carter stated that this matrix is exactly what the Board asked for and that it will go a long way towards what is intended in the Comprehensive Plan. He stated that he thinks Mrs. Stallings did a good job in updating the matrix.

Having a motion and second, Chairman Johnston called for the vote. The resulting vote was Passed, 5-0.

9. PUBLIC COMMENT

Chairman Johnston stated that no one signed up to speak and asked if anyone would like to come forward to speak. No one came forward to speak.

10. PLANNING AND ZONING

11. CONSENT AGENDA

11.1. Budget Amendment for Senior Services.

Consider approving a Budget Amendment in the net amount of \$11,688.00 for Senior Services to allocate grant funding for a new part time position.

11.2. Budget Amendment for CATS.

Consider approving a Budget Amendment for CATS in the amount of \$92,098.00 which is covered by Federal Grant funds.

11.3. Budget Amendment for Recreation & Parks.

Consider a Budget Amendment for Recreation & Parks in the amount of \$208,820.51 using Funds received from Easement Granted for Cell Tower at Hobgood Park

11.4. Intergovernmental Agreement with the City of Canton for the use of County-owned GIS Data.

Consider approval of an Intergovernmental Agreement with the City of Canton for the use of County-owned GIS Data.

11.5. Information Exchange Agreement with the City of Canton for Fingerprinting services for alcohol licenses.

Consider approval of the Information Exchange Agreement with the City of Canton for Fingerprinting services for alcohol licenses.

11.6. Sheriff's Office Grant Acceptance.

Consider accepting the annual Edward Byrne Memorial Justice Assistance Grant (JAG) in the

amount of \$10,014.00 on behalf of the Sheriff's Office and consider authorizing a Budget Amendment to the Multiple Grant Fund in the same amount.

11.7. Surplus Obsolete Technology Equipment.

Consider authorizing the surplus of obsolete computers, printers, scanners, monitors, and network equipment from multiple agencies within the County.

11.8. ARC Sub-Grant Agreement AG2234.

Consider accepting a federal, non-matching grant in the amount of \$70,761.00 on behalf of Senior Services for home delivered meal funding and consider authorizing a Budget Amendment in order to allocate the grant funds in the adopted FY22 Budget.

11.9. Speed Limit Reduction - River Creek Drive.

Consideration to reduce the speed limit on River Creek Drive from 30 mph to 25 mph.

11.10. Speed Limit Reduction - Liberty Hill Road.

Consideration to reduce the speed limit on Liberty Hill Road from 35 mph to 30 mph.

11.11. Alcohol License Residency Waiver Request for Bells Ferry Quick Mart.

Consider approval of the Alcohol License Residency Waiver Request for Bells Ferry Quick Mart located at 6223 Bells Ferry Road, Acworth, Georgia 30102.

11.12. Alcohol License Residency Waiver Request for 6742 Bells Ferry, LLC.

Consider approval of the Alcohol License Residency Waiver Request for 6742 Bells Ferry, LLC located at 6742 Bells Ferry Road, Acworth, Georgia 30102.

11.13. Alcohol License Residency Waiver Request for Phoenix Senior Living Center, LLC.

Consider approval of the Alcohol License Residency Waiver Request for Phoenix Senior Living Center, LLC located at 9651 Union Hill Road Canton, GA 30115.

Benny Carter made a motion to approve the Consent Agenda; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

12. COUNTY MANAGER

12.1. FY2023 CATS GDOT application for 5311 funding.

Consider approval of State FY2023 (July 2022 thru June 2023) GDOT contract in the amount of \$455,000 for operating assistance and \$131,183 for capital costs associated with the CATS 5311 Rural Transportation Program. Cherokee County's obligation is \$227,500 for operations and \$13,118.30 for the capital purchase (2 buses and bus equipment).

Richard Weatherby made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

12.2. CATS Title VI Plan.

Consider approval the Title VI Plan for the Cherokee Area Transportation System (CATS).

Benny Carter made a motion to approve; Richard Weatherby seconded. The resulting vote was Passed, 5-0.

12.3. Cherokee County FHWA Title VI Plan.

Consider approval of the Cherokee County FHWA Title VI Plan.

Benny Carter made a motion to approve; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

12.4. Old Highway 5 Corridor Traffic Study

Consider award of a professional services agreement for the Old Highway 5 Corridor Traffic Study to Keck & Wood, Inc., in the amount of \$139,390.00.

Corey Ragsdale made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

12.5. Dupree Road and King Arthur Drive Drainage Improvement Project - Design Services

Consider approval of a proposal from American Engineers, Inc., to perform design engineering for the Dupree Road and King Arthur Drive Drainage Improvement Project under the annual engineering consulting services contract in the amount of \$36,000.00.

Corey Ragsdale made a motion to approve; Richard Weatherby seconded. The resulting vote was Passed, 5-0.

12.6. South Jett Road - Design Services - Amendment No. 1.

Consider approval of Amendment No. 1 to the design services agreement with Atlas Technical Consultants for roadway design services for the South Jett Road Roadway Improvement Project in the amount of \$43,556.00.

Richard Weatherby made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

12.7. Pavilion Construction for Parks.

Consider approving a Construction Services Agreement with Calm Water, LLC for the construction of three pavilions at multiple parks plus a 10% county-controlled contingency for a total of \$279,748.00.

Commissioner Ragsdale asked what the timeline is for these pavilions.

Community Services Director, Bryan Reynolds, stated that all three (3) pavilions should be complete within six (6) months. He stated that the pavilions will be constructed one (1) at a time. He stated that the pavilion at Mauldin Park is the most time sensitive, as it needs to be constructed not during baseball season. He stated that then they will construct the pavilion at Veteran's Park then Patriot Park.

Corey Ragsdale made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

12.8. Agreement with North Georgia Amateur Umpire Association, Inc. to provide Basketball and Softball Officiating Services.

Consider approving a new Professional Services Agreement with North Georgia Amateur Umpire Association, Inc. for a term of 3 years to provide Officiating Services for Youth and Adult Basketball Sporting Events and Softball Sporting Events for an estimated total amount of \$450,000.

Richard Weatherby made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

12.9. First Amendment to Lease Agreement with Express Employment Professionals for an additional three (3) months at 155 Towne Lake Parkway.

Consider approval of the First Amendment to Lease Agreement with Express Employment Professionals at 155 Towne Lake Parkway, Suite 200, Woodstock, GA 30188 (Tax Commissioner Building) for three (3) additional months.

Benny Carter made a motion to approve; Richard Weatherby seconded. The resulting vote was Passed, 5-0.

12.10. Resolution not to require Mobile Home decals.

Consider approval of a Resolution to not require Mobile Home decals as evidence of a mobile home permit or paid taxes.

Steve West made a motion to approve; Richard Weatherby seconded. The resulting vote was Passed, 5-0.

12.11. Intergovernmental Agreements and Resolution with the City of Woodstock for Fire Training Programs.

Consider the approval of the Intergovernmental Agreements and Resolution with the City of Woodstock for EMT-A and Paramedic Training Programs.

Benny Carter made a motion to approve; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

12.12. CSO Electronic Security Gate Installation.

Consider authorization to install new vehicle security gate at ADC for a total spend of \$30,627 from the Jail 271 Fund.

Richard Weatherby made a motion to approve; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

12.13. Catastrophic Inmate Medical Insurance.

Consider approving a catastrophic medical insurance policy for the Adult Detention Center inmate hospital care from Ironshore Indemnity through Insurance Office of America with a premium of \$207,604.00.

Mr. Morton stated that catastrophic medical insurance is needed to address the added costs associated with inmates requiring offsite medical care.

Corey Ragsdale made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

12.14. Agreement with Watson Consoles Company for new Dispatch Console Furniture for the E 9-1-1 Backup Center.

Consider approving a Professional Services Agreement with Watson Consoles Company for the purchase and installation of Dispatch Console Furniture for the E 9-1-1 Backup Center located at 959 Marietta Highway, Canton, GA., 30114 in the amount of \$120,664.

Chairman Johnston stated that 911 is primarily funded by a tax to your phone bill. He stated that for many counties that is not enough to run their 911 operations. He stated that in this county it covers costs of operations and has enough surplus to cover projects like this.

Mr. Morton stated that the funds are coming from the 911 reserves, however, the County plans to reimburse 911 with ARPA funds once those funds are received.

Chairman Johnston stated that this project is going to be paid for from 911 reserves and that shows good stewardship of Cherokee County tax dollars.

Richard Weatherby made a motion to approve; Benny Carter seconded. The resulting vote was Passed, 5-0.

12.15. Partnership Agreement with Windstream for State Fiscal Recovery Fund.

Consider a Partnership Agreement with Windstream to participate in the State Fiscal Recovery Fund Broadband Infrastructure Program funding opportunity. Cherokee County will act as the

fiscal agent on the application.

Benny Carter made a motion to approve; Corey Ragsdale seconded. The resulting vote was Passed, 5-0.

13. COUNTY ATTORNEY

ADJOURN

Corey Ragsdale made a motion to adjourn at 7:02 p.m.; Benny Carter seconded. The resulting vote was Passed, 5-0.

Appendix D

Title VI Notice to Public

Notifying the Public of Rights Under Title VI

Cherokee Area Transportation System

- The Cherokee Area Transportation System operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Cherokee Area Transportation System.
- For more information on Cherokee Area Transportation System's civil rights program, and the procedures to file a complaint, you may contact the Director of Transportation mgpowell@cherokeega.com, 770-345-6238 or visit the Cherokee Area Transportation System administrative office at 884 Univeter Rd, Canton, 30115. For more information, visit www.cherokeega.com/transportation
- If information is needed in another language, contact 770-345-6238
- TTY/TDD: (800) 255-0056
- You may also file your complaint directly with the FTA at: Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR 1200 New Jersey Ave., SE, Washington, DC 20590

Notificar al público de los derechos bajo título VI

Cherokee Area Transporte Systema

- El Cherokee Area Transporte Systema opera sus programas y servicios sin importar raza, color y origen nacional según el título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Cherokee Area Transporte Systema.
- Para más información sobre Cherokee Area Transporte Systema Programa de derechos civiles y los procedimientos para presentar una queja, puede comunicarse con Director de Transporte mgpowell@cherokeega.com, 770-345-6238 y visita Cherokee Area Transporte Systema administrativo oficina 884 Univeter Rd, Canton, 30115. Para obtener más información, visite www.cherokeega.com/transportation
- Si necesita información en otro idioma, póngase en contacto con 770-345-6238
- TTY/TDD: (800) 255-0056
- También puede presentar su queja directamente con la FTA en: Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR 1200 New Jersey Ave., SE, Washington, DC 20590

Appendix E

Title VI Complaint Form

1.0 Cherokee Area Transportation System

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Cherokee Area Transportation System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Cherokee Area Transportation System investigates complaints received no more than 180 days after the alleged incident. Cherokee Area Transportation System will process complaints that are complete. Once the complaint is received, Cherokee Area Transportation System will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office. Cherokee Area Transportation System has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Cherokee Area Transportation System may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, Cherokee Area Transportation System can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF. The complaint procedure will be made available to the public on Cherokee Area Transportation System's website:

<https://www.cherokeega.com/Transportation/documents.php>

1.1 Complaint Form

A copy of Cherokee County's Title VI complaint form is used to submit the complaint information and is provided on Cherokee County's website(<https://www.cherokeega.com/Transportation/documents>).

Cherokee Area Transportation System

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No

Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature _____
Date

Please submit this form in person at the address below, or mail this form to:

Greg Powell, Director of Transportation
884 Univeter Road
Canton, GA 30115

1.0 Sistema de transporte del área Cherokee

Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional por el Sistema de Transporte del Área Cherokee puede presentar una queja del Título VI completando y presentando el Formulario de Queja del Título VI de la agencia (consulte el Apéndice E). Cherokee Area Transportation System investiga las quejas recibidas no más de 180 días después del presunto incidente. Cherokee Area Transportation System procesará las quejas que estén completas. Una vez que se reciba la queja, Cherokee Area Transportation System la revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo informándole si la queja será investigada por nuestra oficina. Cherokee Area Transportation System tiene noventa (90) días para investigar la queja. Si se necesita más información para resolver el caso, Cherokee Area Transportation System puede comunicarse con el demandante. El denunciante tiene diez (10) días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de los diez (10) días hábiles, Cherokee Area Transportation System puede cerrar administrativamente el caso. Un caso también puede cerrarse administrativamente si el demandante ya no desea continuar con su caso. Después de que el investigador revise la queja, emitirá una de las dos cartas al demandante: una carta de cierre o una carta de hallazgo (LOF). Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI y que el caso se cerrará. Un LOF resume las acusaciones y las entrevistas con respecto al presunto incidente, y explica si se producirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción. Si el demandante desea apelar la decisión, tiene siete (7) días para hacerlo desde el momento en que recibe la carta de cierre o la LOF. El procedimiento de queja se pondrá a disposición del público en el sitio web del Sistema de Transporte del Área Cherokee: <https://www.cherokeega.com/Transportation/documents.php>

1. Formulario de queja

Se utiliza una copia del formulario de queja del Título VI del Condado de Cherokee para enviar la información de la queja y se proporciona en el sitio web del Condado de Cherokee (<https://www.cherokeega.com/Transportation/documents>).

Cherokee Area Transportation System

Formulario de queja del Título VI

Sección I:				
Nombre:				
dirección:				
teléfono (hogar):			teléfono (trabajo):	
Dirección de correo electrónico:				
Requisitos de formato accesible?	Letra grande		Cinta de audio	
	TDD		Otro	
Sección II:				
¿Está presentando esta queja en su propio nombre?			Sí*	No
*Si respondió "sí" a esta pregunta, vaya a la sección III.				
Si no es así, por favor proporcione el nombre y la relación de la persona por la que está querándose:				
Por favor, explique por qué ha presentado una solicitud para un tercero:				
Por favor, confirme que ha obtenido el permiso de la parte agraviada si usted está presentando en nombre de un tercero.			Sí	No
Sección III:				
Creo que la discriminación que experimenté se basó en (Compruebe todo lo que se aplica):				
<input type="checkbox"/> raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional				
Fecha de la presunta discriminación (Mes, Día, Año): _____				
Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminaron (si se conoce), así como los nombres e información de contacto de cualquier testigo. Si se necesita más espacio, utilice la parte posterior de este formulario.				

Sección IV				
¿Ha presentado antes una queja del Título VI ante esta agencia?			Sí	No

Sección V

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?

Sí No

En caso afirmativo, compruebe todo lo que se aplica:

Agencia Federal: _____

Corte federal _____

Agencia Estatal _____

Tribunal Estatal _____

Agencia Local _____

Sírvase proporcionar información sobre una persona de contacto en la agencia o tribunal donde se presentó la queja.

nombre:

título:

agencia:

dirección:

teléfono:

Sección VI

Nombre de la queja de la agencia es contra:

Contact person:

Title:

número de teléfono:

Puede adjuntar cualquier material escrito u otra información que crea que es relevante para su queja.

Firma y fecha requeridas a continuación

_____ firma

_____ fecha

Por favor, envíe este formulario en persona a la dirección que aparece a continuación, o envíelo por correo a:

Greg Powell, Director of Transportation
 884 Univeter Road
 Canton, GA 30115

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Cherokee Area Transportation System was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Cherokee Area Transportation System. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Cherokee Area Transportation System services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Cherokee Area Transportation System also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community-based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Cherokee Area Transportation System and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Cherokee Area Transportation System will proactively reach out and engage low-income, minority, and LEP populations for the Cherokee Area Transportation System service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Cherokee Area Transportation System will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Cherokee Area Transportation System. Cherokee Area Transportation System intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Cherokee Area Transportation System will conduct community meetings as appropriate with passengers, employers, and community based organizations, to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Cherokee Area Transportation System website (www.cherokeega.com/transportation) and all feedback on the site will be recorded and passed on to Cherokee Area Transportation System management. The public will also be able to call the Cherokee Area Transportation System office at 770-345-6238 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Cherokee Area Transportation System management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Cherokee Area Transportation System will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers at Cherokee Area Transportation System office
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

Public Hearing

Cherokee Area Transportation System is required to perform public hearings for changes in fares or decreases in services. Cherokee Area Transportation System will publish the Public Hearing on their website, social media and Cherokee Tribune legal ad. Cherokee Area Transportation System will hold a public hearing at Cherokee County Senior Services building or Cherokee County Administration building. A sign in sheet and presentation will be completed at the public hearing and note any concerns that are conveyed. All concerns are taken into consideration and a written response to each concern are documented.

LCB Meetings

Not applicable to Cherokee Area Transportation System.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Cherokee Area Transportation System operates a transit system within Cherokee County. The Language Assistance Plan (LAP) has been prepared to address Cherokee Area Transportation System's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Cherokee Area Transportation System service area there are 10,924 residents or 4% who describe themselves as not able to communicate in English "very well" (Source: 2019 US Census). Cherokee Area Transportation System is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Cherokee Area Transportation System has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally, recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Cherokee Area Transportation System be able to communicate effectively with all of its riders. When Cherokee Area Transportation System is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Cherokee Area Transportation System is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Cherokee Area Transportation System undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services

- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying Cherokee Area Transportation System staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Cherokee Area Transportation System services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Cherokee Area Transportation System program, activity or service.
2. The frequency with which LEP persons come in contact with Cherokee Area Transportation System programs, activities or services.
3. The nature and importance of programs, activities or services provided by Cherokee Area Transportation System to the LEP population.
4. The resources available to Cherokee Area Transportation System and overall costs to provide LEP assistance
 - a. **Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population**

Of the 258,773 residents in the Cherokee Area Transportation System service area 10,924 residents describe themselves as speaking English less than “very well”. People of Spanish or Spanish Creole descent are the primary LEP persons likely to utilize Cherokee Area Transportation System services. For the Cherokee Area Transportation System service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 95.4% speak English “very well”. For groups who speak English “less than very well”, 4% speak Spanish and .04% speak Other Indo-European languages and 0.4% speak Asian and Pacific Island languages.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Cherokee Area Transportation System service area.

- b. **Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services**

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Cherokee Area Transportation System has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that Spanish speaking population is the most prominent in the area. Phone inquiries and staff survey feedback indicated that Cherokee Area Transportation System dispatchers and drivers interact frequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 3 years, Cherokee Area Transportation System has had 2 requests for translated documents Manderin and Spanish.

c. **Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People's Lives**

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An on-board passenger survey was conducted to collect data on usage of and access to the Cherokee Area Transportation System services. According to the survey, the most common age among all the participants in the survey was 60 or older. This supports the fact that Cherokee Area Transportation System can be considered a senior transit service as most of its patrons are over the age of 60.

To further access personal mobility options, each respondent was asked how he or she would have made the surveyed trip had Cherokee Area Transportation System not been available. The most frequent response was "friend of family member" (30 percent). An additional 25 percent indicated they would not have made the surveyed trip if the service was not available. This data indicates that the Cherokee Area Transportation System Service is very important as a primary means of transportation for its customers.

d. **Factor 4: The Resources Available to the Recipient and Costs**

Cherokee Area Transportation System assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: Cherokee Area Transportation System website, brochures, and I Speak cards on each bus which costs \$50 in total. Cherokee Area Transportation System provides a reasonable degree of services for LEP populations in its service area.

III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures

3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

a. **Element 1: Identifying LEP Individuals Who Need Language Assistance**

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Cherokee Area Transportation System has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 95% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (9%). Of those whose primary spoken language is Spanish, approximately 44% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for 4% of the service area population.

Cherokee Area Transportation System may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards available at Cherokee Area Transportation System Meetings. This will assist Cherokee Area Transportation System in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Cherokee Area Transportation System management to follow-up.
4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. **Element 2: Language Assistance Measures**

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

Cherokee Area Transportation System has undertaken the following actions to improve access to information and services for LEP individuals:

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Provide Language Identification Flashcards onboard transit vehicles and in the Cherokee Area Transportation System offices.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Cherokee Area Transportation System will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

c. Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Cherokee Area Transportation System, the most important staff training is for Customer Service Representatives and transit drivers. Several representatives are bilingual in English and Spanish.

The following training will be provided to Customer Service Representative:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

d. Element 4: Providing Note to LEP Persons

Cherokee Area Transportation System will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Cherokee Area Transportation System office lobby, on buses, and on the website. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices,

flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. **Element 5: Monitoring and Updating the Plan**

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether Cherokee Area Transportation System's financial resources are sufficient to fund language assistance resources needed

Cherokee Area Transportation System understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Cherokee Area Transportation System is open to suggestions from all sources, including customers, Cherokee Area Transportation System staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Cherokee Area Transportation System service area does not have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, 8,543 speakers qualify for the Safe Harbor Provision as the number of person which speak English less than "very well" is counted as nearly 4% and 8,543 persons.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Cherokee Area Transportation System may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

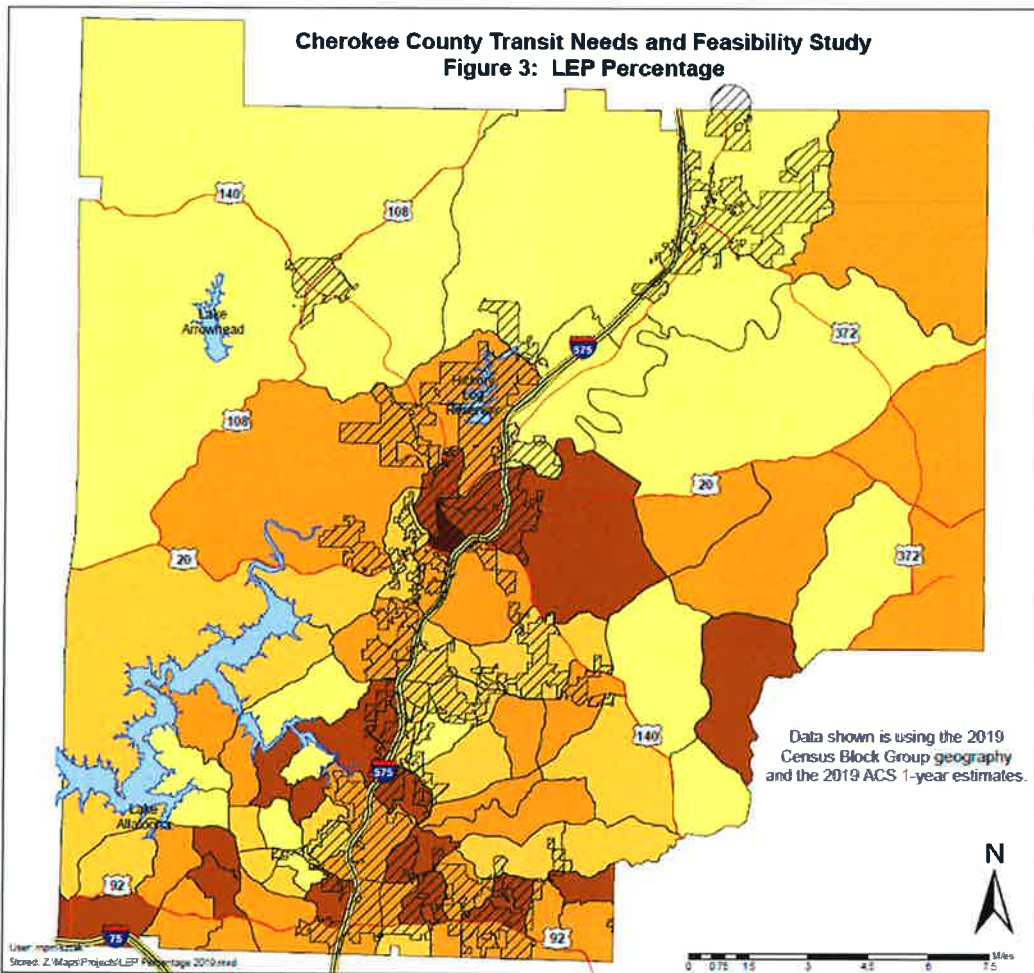
Appendix H

Operating Area Language Data: Cherokee Area Transportation System Service Area






Language	County	Percent of Population
Total	258,773	100%
Speak only English	204,376	88%
Spanish or Spanish Creole	19,602	9%
Speak English "very well"	11,059	5%
Speak English less than "very well"	8543	4%
Other Indo-European languages	4635	Less than 1%
Speak English "very well"	3786	Less than 1%
Speak English less than "very well"	849	Less than 1%
Asian and Pacific Island languages	2531	Less than 1%
Speak English "very well"	1600	Less than 1%
Speak English less than "very well"	931	Less than 1%
Other languages	1473	Less than 1%
Speak English "very well"	990	Less than 1%
Speak English less than "very well"	483	Less than 1%

Appendix I
Demographic Maps

Cherokee County Transit Needs and Feasibility Study
Figure 3: LEP Percentage



LEP Percentage

-  0 - 4.8%
-  4.9 - 10.7%
-  10.8 - 17.5%
-  17.6 - 41.5%
-  41.6 - 68.3%

Map Description

LEP Percentage 2019

Date of Creation
8/26/2021

Produced by:
Cherokee County GIS



This Map Has Been Compiled From The Most Up To Date And Reliable Sources Available. Cherokee County Assumes No Responsibility For Errors Or Omissions Contained Within This Map. No Warranties or Representations Are Expressed Or Implied In Fact Or In Law.

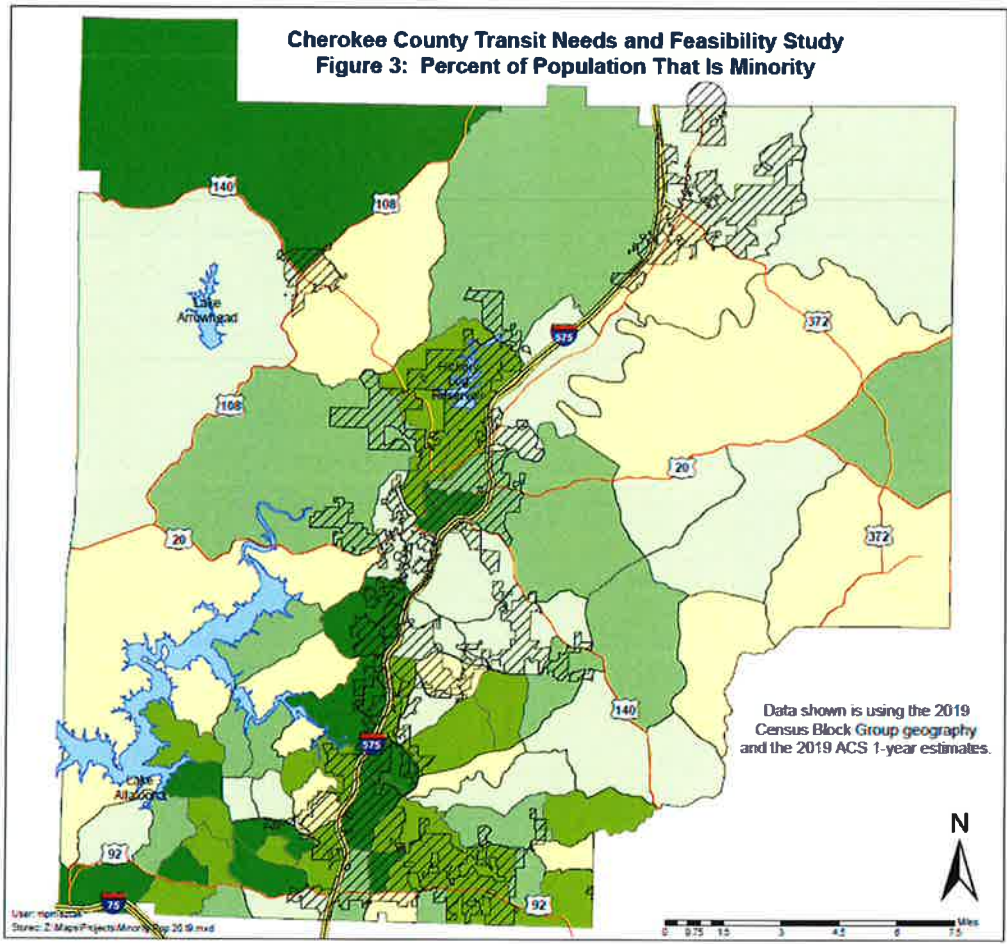
Data shown is using the 2019 Census Block Group geography and the 2019 ACS 1-year estimates.



0 0.75 1.5 3 4.5 6 7.5 Miles

User: mgp@ccga.gov
 Stored: Z:\Maps\Projects\LEP Percentage 2019.mxd

Cherokee County Transit Needs and Feasibility Study
Figure 3: Percent of Population That Is Minority



Percent of Population That Is Minority

- 0 - 3.7%
- 3.8 - 8.3%
- 8.4 - 14.2%
- 14.3 - 24.1%
- 24.2 - 42.1%

Map Description

Minority Pop 2019

Date of Creation
8/26/2021

Produced by:
Cherokee County GIS

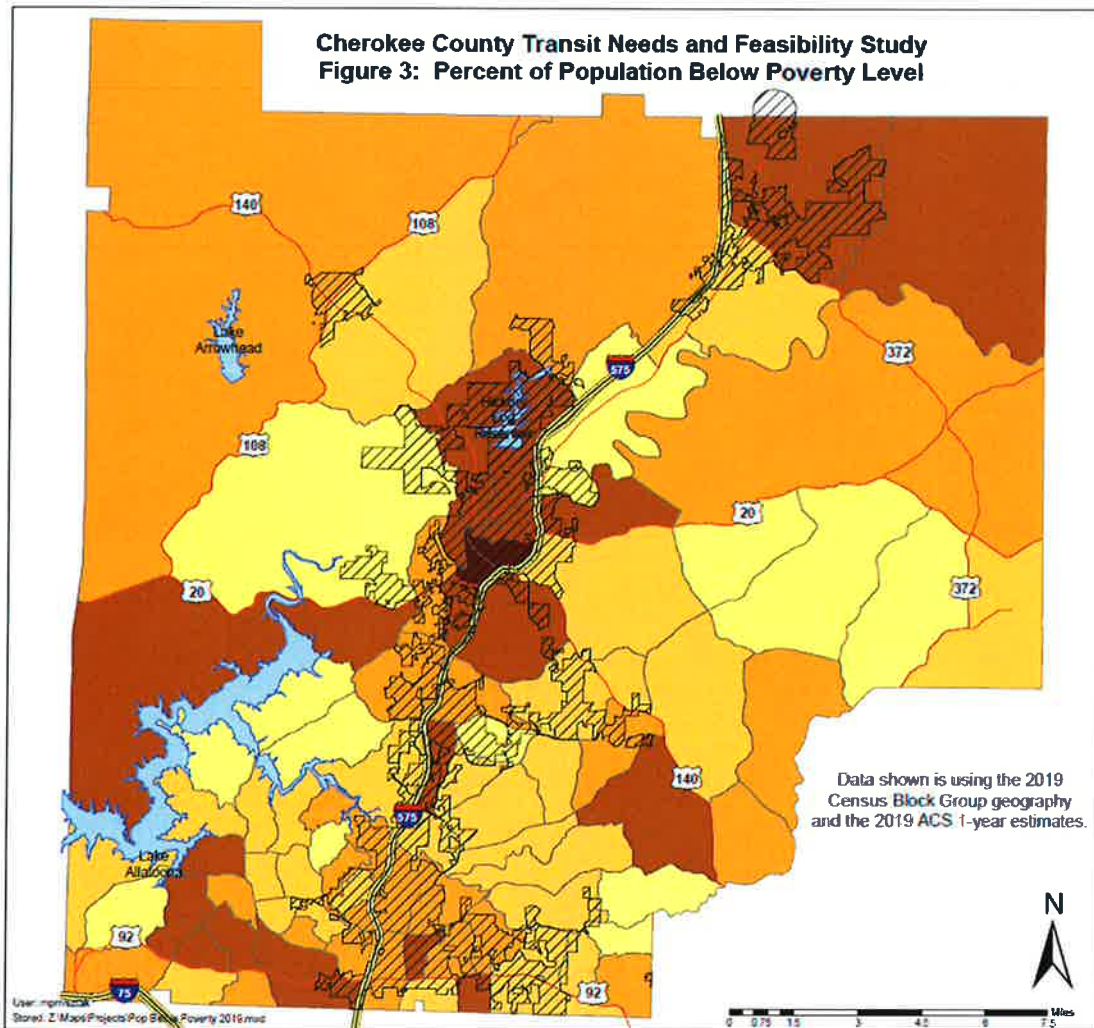


This Map Has Been Compiled From The Most Up To Date And Reliable Sources Available. Cherokee County Assumes No Responsibility For Errors Or Omissions Contained Within This Map. No Warranties or Representations Are Expressed Or Implied In Fact Or In Law.

Data shown is using the 2019 Census Block Group geography and the 2019 ACS 1-year estimates.

User: hcr3000
 Stored: Z:\Maps\Projects\Minority Pop 2019.mxd

**Cherokee County Transit Needs and Feasibility Study
Figure 3: Percent of Population Below Poverty Level**



Percent of Population Below Poverty Level

- 0 - 1%
- 1.1 - 6.5%
- 6.6 - 12%
- 12.1 - 20%
- 20.1 - 34.6%

Map Description
Pop Below Poverty 2019
Date of Creation 8/26/2021
Produced by: Cherokee County GIS



This Map Has Been Compiled From The Most Up To Date And Reliable Sources Available. Cherokee County Assumes No Responsibility For Errors Or Omissions Contained Within This Map. No Warranties or Representations Are Expressed Or Implied In Fact Or In Law.

Appendix J
Title VI Equity Analysis

Cherokee Area Transportation System has not performed Title VI Equity Analysis.