BROWARD COUNTY
TRANSIT MAJOR
SERVICE CHANGE
NEW COMMUTER
EXPRESS
(75 EXPRESS)
ROUTE 115 –
SUNRISE/MIAMI
AIRPORT STATION

A Title VI Service Equity Analysis

Prepared October 2019

Submitted in compliance with Title VI of the Civil Rights Act of 1964, as amended and guidance found in FTA C4702.1B, dated October 1, 2012



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INTRODUCTION

Under Title VI of the Civil Rights Act of 1964, as amended, as recipients of federal financial assistance, the Broward County Board of County Commissioners, without regard to race, color, or national origin, operate and plan for transit services so that: transit benefits and services are available and provided equitably; transit services are adequate to provide access and mobility for all; opportunities to participate in the transit planning and decision-making process are open and accessible; and that remedial and corrective actions are taken to prevent discriminatory treatment of any beneficiary.

This Title VI Service Equity Analysis was conducted by the Broward County Transportation Department, Transit Division for the establishment of a new commuter express route along Interstate 75, Route 115: Sunrise/Miami Airport Station (75 Express). The 75 Express, will operate from the BB&T Park and Ride Lot located in the City of Sunrise and terminate at the Miami Intermodal Center at the Miami International Airport in Miami-Dade County with an intermediate stop at the Miami Gardens Drive Park and Ride Lot. This service is scheduled to begin revenue service in January of 2020. This report was prepared in accordance with the requirements specified in the Federal Transit Administration (FTA), Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," dated October 1, 2012.

ABOUT BROWARD COUNTY TRANSIT

Broward County Transit (BCT) is composed of more than 1,410 individuals working together to deliver public transportation services within a 410 square mile service area in Broward County that serves approximately 1.9 million local residents.

BCT operates four distinct transportation services. These modes include BCT fixed route, fixed route community bus, fixed route commuter express, and paratransit services. Fixed route service connects with local transit systems in neighboring counties in addition to the tri-county commuter rail system (Tri-Rail). BCT operates out of two facilities: Pompano Beach, Florida, and Dania Beach, Florida. As of September 2019, BCT operates 36 fixed routes, 4 limited-stop (Breeze) routes, 5 express routes, and 51 community bus routes with a fleet of approximately 417 vehicles. This network of services currently provides more than 27.8 million passenger trips annually. Due to Broward County's location in the center of the Miami Urbanized Area (UZA) these routes are critical for providing connectivity throughout the metropolitan area, including Miami-Dade and Palm Beach counties.

BCT operates approximately 15.1 million fixed route revenue miles per year at 24 passengers per hour and \$4.15 cost per unlinked trip¹. BCT is responsible for transit system development, planning, and



¹ National Transit Database (NTD) Report Year 2018 Statistics

operations to promote a convenient user-friendly transit system, allowing for expanded transportation alternatives for Broward County residents and visitors.

DEFINITIONS

BCT Systemwide Average: Average for all BCT operated fixed routes determined by on-board passenger survey data.

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

Disparate Impact Threshold: The standard used to determine if a proposal creates disparate impacts. BCT defines this threshold in its Disparate Impact Policy as 15 percent deviation from the BCT system average.

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

Disproportionate Burden Threshold: The standard used to determine if a proposal creates disproportionate burdens. BCT defines this threshold in its Disproportionate Burden Policy as 15 percent deviation from the BCT system average.

Express Service: A bus route that operates a portion of the route without stops or with a limited number of stops and is usually characterized by operating at least five miles of closed door service to a regional destination.

Fixed Route (Local): Service provided on a repetitive, fixed-schedule basis along a specific route with vehicles stopping to pick up and deliver passengers to specific locations; each fixed-route trip serves the same origins and destinations, unlike demand responsive and taxicabs.

Limited Stop (Breeze) Service: A service midway between local and express services that usually supplements local service by providing similar alignment with less stops and faster operational speeds.

Low-Income: A person that has indicated a household income of \$25,750 or below is considered to meet poverty guidelines according to the US Department of Health and Human Services.

Minority: A person or passenger who identifies as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino (of any race), Native Hawaiian or Other Pacific Islander, or identifies as more than one race (multiracial) or some other race.

Service Area: A defined geographic area from which the transit operator provides service that is calculated using a one-quarter mile (3 miles for Express Service Park and Ride Lots) buffer on each side of a transit route.



SERVICE EQUITY ANALYSIS

In compliance with Title VI, a service equity analysis is required to evaluate potential disparate impacts or disproportionate burdens on Title VI protected populations before implementation of a major service change. If such impacts are identified, a plan to mitigate these impacts or analysis of less impactful alternative must be identified prior to implementation². This section will address major service change threshold, public participation, proposed service changes, methodology, and analysis used to determine impacts of the service change proposal.

MAJOR SERVICE / FARE CHANGE

In accordance with Title VI, BCT conducts service and/or fare equity analyses when a major service change is proposed. BCT used the following thresholds (outlines) to determine whether or not a service change constitutes a major service change. This policy, as approved by the Board in 2014, is outlined in the table below:

BCT Major Change Thresholds

| Service Change | Major Service Change Threshold | | | |
|-----------------------|---|--|--|--|
| Service Miles | More than 25% route or weekly revenue miles | | | |
| Express Service Miles | More than 50% route or weekly revenue miles | | | |
| Headways/Frequency | More than 15 minutes | | | |
| Route | Establishment or discontinuation of a route | | | |
| Fares | Any change in fares | | | |

² According to FTA C4702.1B, A transit provider may enact a service or fare change that is found to cause a disparate impact if the transit provider has a substantial legitimate justification for the proposed change and the transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals.



PUBLIC PARTICIPATION

BCT has developed an outreach plan to inform the public of this major service proposal prior to the public hearing before the Broward County Board of County Commissioners. The plan includes Educational/Community Outreach which will include face to face and one on one interactions with the public. We will also utilize Broadcast, Social, Digital, and Print Media in addition to seat-drops and rack cards in Spanish, Creole and Portuguese. Community outreach events were scheduled. The meetings were scheduled in locations to attract a diverse crowd including areas identified in BCT's Title VI Program as predominately minority, low-income, or have high proportions of residents with limited English proficiency. All locations are directly accessible to BCT transit routes and some locations were selected due to the density of nearby transit routes and transfer activity³.

Summary of Community Outreach Event Locations

| Location | Date | Minority | Low- Income | Limited English Proficient | Near Major Transfer Center |
|-----------------------------------|---------|----------|----------------|-------------------------------|-------------------------------|
| Tamarac Community Center | Nov. 7 | Х | | | |
| Miami Airport Tri-Rail Station | Nov. 12 | | | | Х |
| Miami Gardens Park & Ride | Nov. 14 | | | | Х |
| BB&T Park & Ride | Nov. 21 | | | | Х |

The public hearing on the service proposal is scheduled before the Broward County Board of County Commissioners on December 3, 2018. The public hearing will be held at the Broward County Governmental Center in downtown Fort Lauderdale. This location is easily accessible to transit due to its proximity to the BCT Central Terminal. Public outreach notices will be posted at major transfer locations, on-board buses, and online⁴. BCT will document all public comments received in relation to this service change proposal.

LEP CONSIDERATIONS

On December 1, 2011, BCT adopted its Limited English Proficiency (LEP) Plan. The plan identified reasonable steps to provide language assistance for LEP persons seeking meaningful access to BCT service as required by Executive Order 13166. BCT has included efforts in the public outreach plan for this proposal that are designed to inform LEP Spanish, French Creole, and Portuguese speaking passengers. In



³ Appendix D: Public Outreach Plan

⁴ Appendix E: Public Meeting / Outreach Notices

accordance with the LEP plan, if this commuter express route is approved, BCT will provide detailed information about the route in formats accessible to our LEP passengers⁵.

SERVICE CHANGE PROPOSAL

Broward County Transit (BCT), in partnership with the Florida Department of Transportation (FDOT), will introduce Premium Commuter Express Bus Service along the I-75 corridor. This new I-75 Express Bus Service will operate in the high occupancy toll (HOT) lanes of I-75 and the Palmetto Expressway and will link customers in the western portion of Broward County with access to employment, education and medical centers, and transit facilities at the MIC. The MIC provides connections which service major employment centers and business districts throughout Miami-Dade County including Doral, Miami Civic Center, and downtown Miami/Brickell business district, and the Miami International Airport. The service will operate both directions weekdays during the morning and afternoon peak travel hours at 30-minute headways. The service is being funded by Florida Department of Transportation (FDOT) Midday or weekend service, as well as reverse trips, are not proposed at the initial start of service.

A description for the Title VI Major Service proposal is outlined in the table below:

Title VI Major Service Change Proposal

| Route | Corridor | Description | Major Service Change? |
|-------|----------|----------------------------|---------------------------------------|
| 115 | I-75 | New commuter express route | YES- Requires Service Equity Analysis |

METHODOLOGY

BCT uses a methodology consistent with FTA guidance in Circular 4702.1B to conduct service equity analyses. On-board survey data collected during the TDP update in the 2nd quarter of 2018 is the primary data source for all equity analyses⁶. New routes created after the 2018 survey effort use the *US Census Bureau's American Community Survey 5-Year Estimates*. The following steps are used in completing the Title VI Service Equity Analysis:

- I- The adverse effects of the service change are identified. Adverse effects include but are not limited to:
 - a. Route discontinuation
 - b. Segment elimination, truncation, or re-routing
 - c. Headway increases
 - d. Reduction of service span



⁵ Appendix C: Map of BCT Limited English Proficient Population by Language Spoken at Home

⁶ Appendix A: BCT Demographic Profile

- II- If adverse effects are identified BCT will outline steps taken to mitigate the impact of the service change.
- III- Routes with no adverse effects will also be identified. The service changes proposed on these routes will enhance or benefit riders.
- IV- The percentage breakdown of minority and low-income passengers from the on-board survey will be calculated and applied to the average weekday ridership for each route.
- V- The cumulative percentage of minority and low-income passengers will be calculated for two categories:
 - a. Routes changes with adverse effects (reductions)
 - b. Route changes without adverse effects (improvements)
- VI- The percentage deviation between the minority and low-income levels of each category are compared to the BCT systemwide average to determine if disparate impacts or disproportionate burdens result from the service change proposal⁷.
- VII- If disparate impacts or disproportionate burdens are found then alternatives are analyzed to see if legitimate program goals can be met with a less impactful proposal.

DEMOGRAPHIC ANALYSIS

As Route 115 (75 Express) is a new commuter express route, the 2013-2017 American Community Survey 5-Year Estimates was utilized to analyze the demographics of the census tracts surrounding the park and ride lots serviced by the proposed route. Demographic information for minority, low-income, age, and vehicle availability per household were examined. The results indicated that although Route 115 is predominantly minority (76%), the percentage deviation between the minority level for the total population along the proposed route compared to systemwide is not greater than the disparate impact of disproportional burden threshold of -15%. In the case of income, although the percentage of low-income population along the proposed route (15%) is lower than the systemwide percentage (22%), the deviation is not greater than the disproportionate burden threshold of -15%. As a result, the proposal to implement Route 115 — Sunrise/Miami Airport Station will not cause a disparate impact or disproportionate burden on Title VI protected populations. No additional analysis or alternatives are necessary to implement this service change.

⁷ Note: For routes with adverse effects (reductions) the disparate impact or disproportionate burden threshold is 15% or greater. For routes without adverse effects (benefits) the disparate impact or disproportionate burden threshold is -15% or less.



RESULTS

The service equity analysis found that the service change proposal does not cause disparate impacts or disproportionate burdens on Title VI protected populations⁸. No additional analysis or alternatives are necessary to implement this service change.

Disparate Impact and Disproportionate Burden Thresholds

| Service Change Proposal | Minority Deviation from System Average | Low-income Deviation from System Average |
|---|--|---|
| Route Changes with Adverse Effects (Reductions) | >15% | >15% |
| Route Changes without Adverse Effects (Improvements) | <-15% | <-15% |



⁸ Appendix G: Completed Service Equity Analysis Tables

Title VI Service Equity Analysis Results

| Service Change Proposal | Minority Deviation from System Average | Disparate Impact? | Low-income Deviation from System Average | Disproportionate Burden? |
|--|--|----------------------|---|-----------------------------|
| Route Changes with Adverse Effects (Reductions) | N/A | N/A | N/A | N/A |
| Route Changes without Adverse Effects (Improvements) | 12.8% | NO | 7.6% | NO |

RECOMMENDATIONS

Based on the results of the service equity analysis, Route 115 does not have significant minority and low-income population compared to the systemwide population averages. As a result, the implementation of this new route will not create a disparate impact or pose a disproportionate burden on our Title VI protected passengers. BCT is comfortable that all requirements under FTA Circular 4702.1B have been satisfied to implement the service proposal. As such, BCT may proceed with its implementation of Route 115 along the I-75 corridor which will provide additional service, connections, and travel options to passengers traveling to employment centers on or within the vicinity of Miami International Airport in Miami-Dade County. With this new service, BCT continues its commitment of providing safe and reliable transportation solutions that link people, connect communities, support employment and contribute to the overall economic growth of our region.



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APPENDIX A: DEMOGRAPHIC ANALYSIS

There has been a significant change in the racial and ethnic makeup in Broward County between the 2000 and the 2010 US Census. As indicated by the 2010 US Census, Broward has become a "minority-majority" county. For the first time, the Non-Hispanic White population accounted for less than 50 percent of the total population. While the Non-Hispanic Black/African-American population still remains the largest minority group, it is now closely followed by the Hispanic population. The trend in Broward County reflects the national trend of an ever increasing minority population cohort.

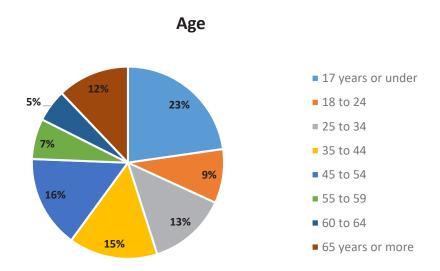
BCT uses a one-quarter mile buffer around local and limited stop routes and a three-mile buffer around park and ride lots to establish the service area. The 2018 BCT service area population is 1,935,878. The percentage of minorities in the service area is 63.5 percent and low-income population comprises 22.4 percent.

In 2018, BCT conducted a major update of the 10-year Transit Development Plan (TDP). A significant portion of the TDP focused on generating an updated BCT rider demographic profile. A total of 7,199 passenger surveys were collected on-board BCT routes during the second quarter of 2018. The system-wide results of the on-board survey are statistically significant with greater than 95% confidence and margin of error of ±3 percent. Additional information about the on-board survey effort and findings can be found in the BCT Connected 2019-2028 Transit Development Plan9. On-board survey data was used for trip purpose and frequency of use. Since Route 115 is a new route, the 2013-2017 American Community Survey 5-Year Estimates was utilized to determine the age, ethnic origin, income, and number of vehicles in a household for the population within the service area.

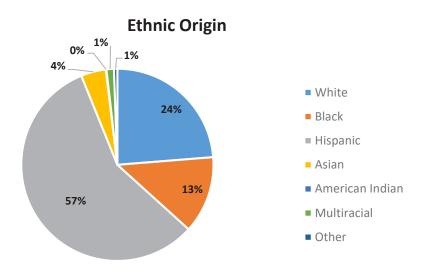
A demographic summary of the new commuter express Route 115 is provided below:

⁹ BCT Connected Transit Development Plan: http://www.broward.org/bct/pages/transitdevelopmentplan.aspx





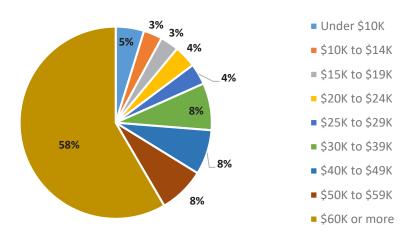
Over 65 percent of the population within the census tracts along the Route 115 alignment are between the ages of 18 to 64. Over 22 percent were under the age of 17, while 12 percent is over the age of 65. These percentages are similar to the BCT systemwide proportion (6 percent age 18 to 64, 21 percent 17 years or under, and 16 percent 65 years or more).



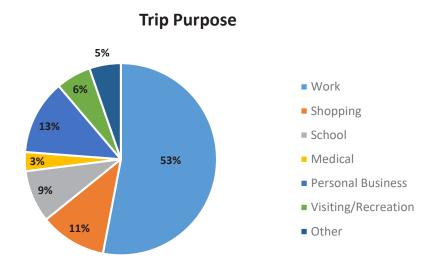
Minorities comprise over 76 percent of the population along the census tracts along the Route 115 alignment. Compared with the BCT systemwide population (64 percent), a higher proportion of minorities are serviced by this route. Based on the analysis of census tracts along the Route 115 alignment minorities make up over 76 percent of the total population; 57 percent are Hispanics, 13 percent are Black/African Americans, 4 percent are Asian, with approximately 2 percent Multiracial, Other, and American Indian. Non-Hispanic White make up nearly 24 percent of the total population along the census tracts.



Annual Household Income

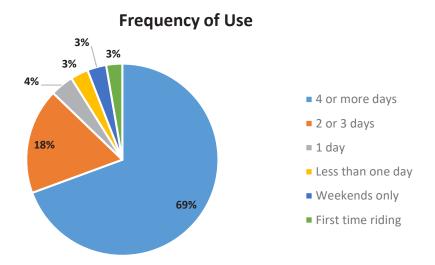


Systemwide, the percent of household with a annual household income below \$25,000 is over 22 percent. The percentage of households within the census tracts along the Route 115 alignment is below the systemwide proportion at 15 percent.



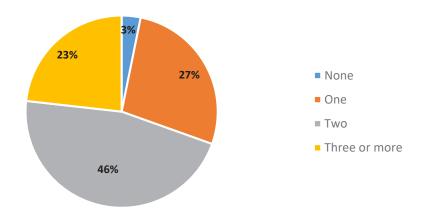
Over 53 percent of the respondents in the on-board survey use BCT primarily for work, followed by personal business with 13 percent and shopping at 11 percent.





The average BCT rider is a frequent user of the system with around 69 percent of passengers using the system 4 or more days per week. Over 87 percent of riders use BCT at least 2 days per week.

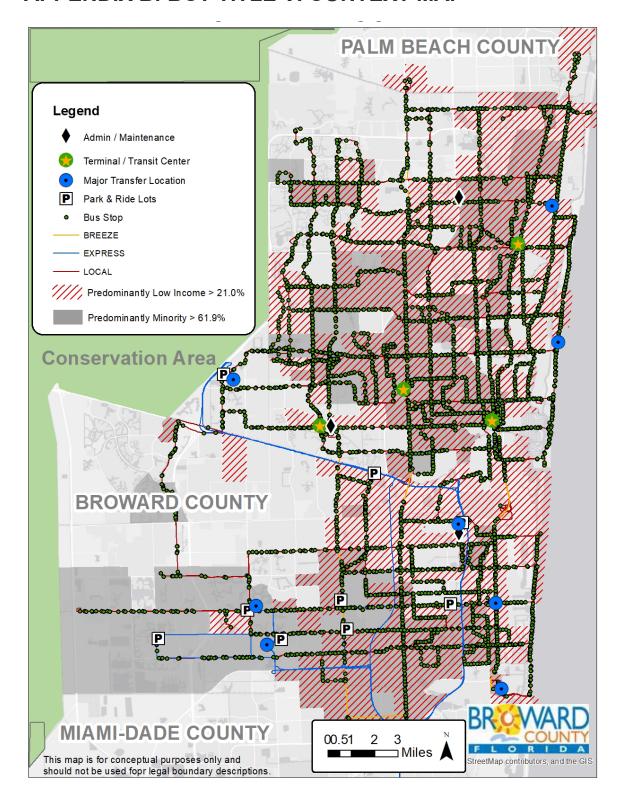
Number of Vehicles Available in Household



Over 3 percent of total households within the census tracts along the Route 115 alignment have no vehicle available. This percentage is smaller than the BCT systemwide average, where 7.3 percent of households have no vehicle available.

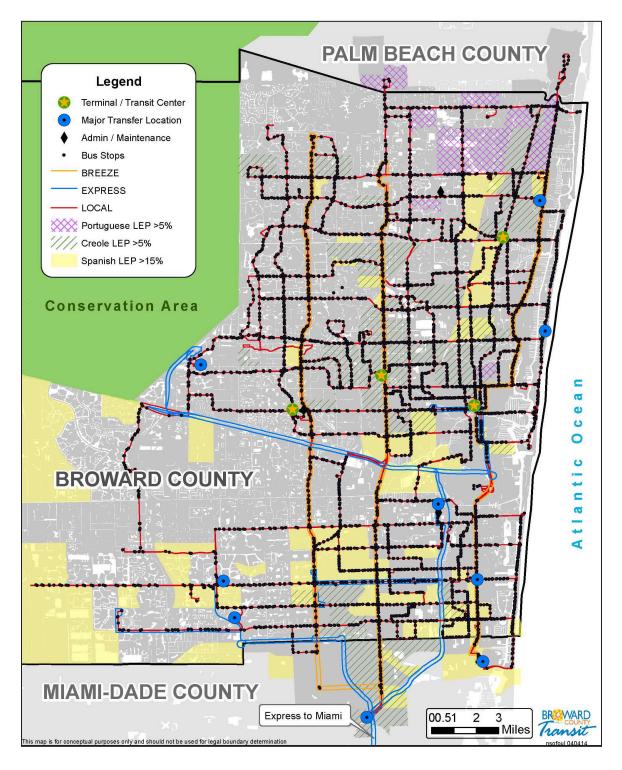


APPENDIX B: BCT TITLE VI CONTEXT MAP





APPENDIX C: BCT LEP CONTEXT MAP





APPENDIX D: PUBLIC OUTREACH PLAN

CUSTOMER EDUCATION

To introduce a new bus route and provide printed materials to attract and educate customers, marketing collateral will be created and distributed at outreach events. These materials include tri-fold brochures in four languages (English, Creole Portuguese, and Spanish), tabletop signs, large posters for the customer service booths, A-Frame signs at the bus terminals, seat drops, and interior bus placards. Outreach to inform the public of the new route changes will be done countywide, and in several locations.













CUSTOMER EDUCATION/INTERACTION

The locations below represent just a few of the face to face customer interaction outreach locations.

- Tamarac Community Center 8601 West Commercial Boulevard, Tamarac, FL 33321
- Miami Airport Tri-Rail Station 3861 Northwest 21st Street, Miami, FL 33142
- Miami Gardens Park & Ride Miami Gardens Drive & NW 73 Avenue, Miami Gardens, FL 33169
- **BB&T Park & Ride** 2091 NW 136th Ave, Plantation, FL 33323
- Broward College 3501 S.W. Davie Road, Davie, FL 33314
- FAU 3200 College Ave, Davie, FL 33314
- University of Miami Medical Center 1400 NW 12th Ave, Miami, FL 33136
- Miami International Airport 2100 NW 42nd Avenue, Miami FL33126
- Markham Park 16001 W. State Road 84, Sunrise, FL 33326
- Miramar Regional Park 16801 Miramar Pkwy, Miramar, FL 33027
- Pembroke Lakes Mall 11401 Pines Blvd. Pembroke Pines, FL 33026













APPENDIX D: PUBLIC OUTREACH PLAN

MARKETING MATERIALS

BCT has developed an outreach/marketing plan to inform the public about this major service proposal. The plan includes educational/community outreach which will include face to face and one on one interactions with the public, marketing materials that include print collateral such as 2-sided flyers, seat drops for buses, on-board rack cards printed in four languages (English, Spanish, Creole and Portuguese), bus placards, tabletop signs and A-Frame signs at bus terminals.

We will also utilize broadcast, social, print and digital media to include on-board bus monitors, BCT's website, Transit Flash email notification and, when available, radio and television.













MARKETING MATERIALS- ADS



















APPENDIX D: PUBLIC OUTREACH PLAN

MARKETING MATERIALS

2-Sided Rack Cards: English, Spanish, Creole and Portuguese

A Frame Signs



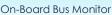






MARKETING MATERIALS- DIGITAL







Bus Terminal Monitor



Real Time Bus Monitor



BCT's Online Website

TRANSIT NEWS LINKS













APPENDIX E: PUBLIC MEETING NOTICES



NOTICE OF PUBLIC HEARING NEW I-75 EXPRESS ROUTE 115

BROWARD COUNTY, FL — The Broward County Commission will hold a public hearing on Tuesday, December 3, 2019, at 10:00 a.m., at the Broward County Governmental Center, Room 422, 115 South Andrews Avenue, Fort Lauderdale, to receive public input on the proposed implementation of the Broward County Transit Division's new express transit service starting January 13, 2020, that will travel on the I-75 express lanes between the City of Sunrise (BB&T Center) and the City of Miami, (Miami Airport Station) with an additional stop in the City of Miami Gardens at the newly constructed FDOT Park and Ride. The 75 Express fixed-route bus service will operate every 30 minutes during the morning and afternoon peak travel hours.

Public participation is solicited without regard to race, color, national origin, sex, religion, disability, or family status.

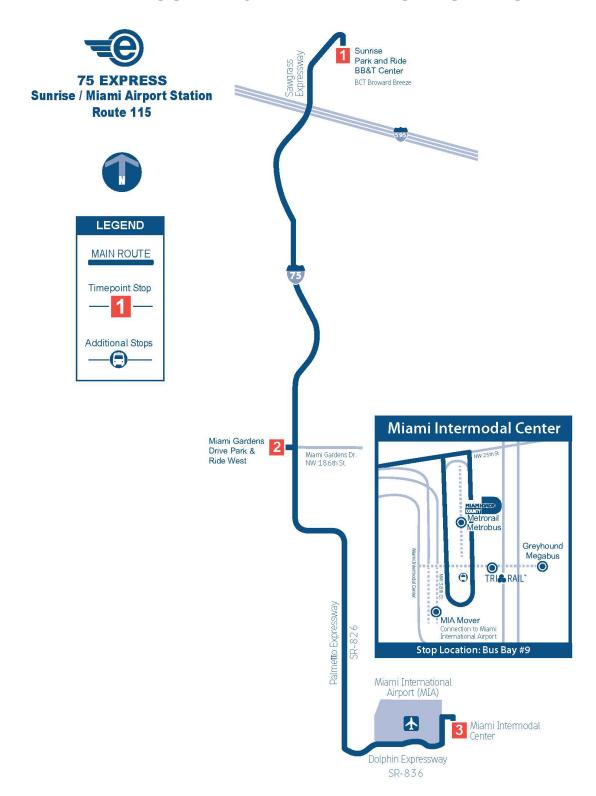
Persons with disabilities who require assistance should notify BCT at (954) 357-8481 or phone the TDD line at (954) 357-8302 at least two (2) business days in advance of the meeting.

If you are unable to attend the public hearing, send your written comments to: Broward County Transit Customer Relations and Communications 1 North University Drive, Suite 2401B Plantation, FL 33324

Or, send comments online at Broward.org/BCT and click on "Contact Us."



APPENDIX F: ROUTE 115 - MIAMI AIRPORT STATION MAP





APPENDIX G: SERVICE EQUITY ANALYSIS TABLES

Minority Percentage Comparison

| 7 0 1 | | | | | | | |
|-------------------------|--------------------|------------------------|--|--|--|--|--|
| Race/Ethnicity | Proposed Route 115 | BCT Systemwide Average | | | | | |
| Black/ African American | 13.0% | 29.4% | | | | | |
| White | 23.7% | 36.5% | | | | | |
| Hispanic | 57.2% | 28.4% | | | | | |
| Asian | 4.2% | 3.3% | | | | | |
| American Indian | 0.1% | 0.2% | | | | | |
| Multiracial | 1.3% | 1.8% | | | | | |
| Other | 0.6% | 0.5% | | | | | |
| Total Minority | 76.3% | 63.5% | | | | | |
| Predominantly Minority? | YES | N/A | | | | | |

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census Bureau

Low-Income Percentage Comparison

| Household Income | Proposed Route 115 | BCT Systemwide Average |
|---------------------------|--------------------|------------------------|
| Under \$10K | 4.8% | 6.9% |
| \$10K to \$14,999 | 3.1% | 4.8% |
| \$15k to \$19,999 | 3.1% | 5.2% |
| \$20k to \$24,999 | 3.8% | 5.5% |
| \$25k to \$29,999 | 3.6% | 5.1% |
| \$30k to \$39,999 | 7.9% | 9.9% |
| \$40k to \$49,999 | 7.5% | 9.3% |
| \$50k to \$59,999 | 7.8% | 7.9% |
| \$60k or more | 58.4% | 45.4% |
| Less than \$25k | 14.8% | 22.4% |
| Predominantly Low-Income? | NO | N/A |

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census Bureau

Title VI Major Service Changes – Disparate Impact Assessment

| Route | Service Type | Adverse Effects? | Description | Minority Percentage | Systemwide Average | Deviation from Systemwide Average | Disparate Impact? |
|-------|---------------------|---------------------|-------------|------------------------|-----------------------|--------------------------------------|----------------------|
| 115 | Commuter Express | None | New service | 76.3% | 63.5% | | |
| | | | | | Total | 12.8% | NO |

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census Bureau

Title VI Major Service Changes - Disproportionate Burden Assessment

| Route | Service Type | Adverse Effects? | Description | Low-income Percentage | Systemwide Average | Deviation from Systemwide Average | Disproportionate Burden? |
|-------|---------------------|---------------------|-------------|--------------------------|-----------------------|---|-----------------------------|
| 115 | Commuter Express | None | New service | 14.8% | 22.4% | | |
| | | | | | Total | -7.6% | NO |

Source: 2013-2017 American Community Survey 5-Year Estimates, U.S. Census Bureau

^{*} New Route: In lieu of on-board survey data, demographics are based on US Census 2013-2017 American Community Survey 5-Year Estimates



^{*} New Route: In lieu of on-board survey data, demographics are based on US Census 2013-2017 American Community Survey 5-Year Estimates

PROTECTIONS OF TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED

Any person or group(s) who believes that they have been subjected to discrimination because of race, color, or national origin, under any transit program or activity by Broward County Transit (BCT), may call (954)357-8481 to file a Title VI discrimination complaint or write to Broward County Transportation Department, Compliance Manager, One N. University Dr., Ste 3100A, Plantation, Florida 33324

