BROWARD COUNTY TRANSIT SERVICE CHANGE

MAJOR SERVICE CHANGE TO 95 EXPRESS HOLLYWOOD

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

A Title VI Service Equity Analysis

Service Plan Prepared January 2019



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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 discontinuation of express route 107-95 Express Hollywood effective February 22, 2019. 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 1,055 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 shuttle, 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 December 2018, BCT operates 35 fixed routes, 3 limited-stop (Breeze) routes, 6 express routes, and 51 community shuttle routes with a fixed-route fleet of approximately 359 vehicles. The fixed-route, commuter express, and community shuttle services currently provide more than 31.3 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 25.2 passengers per hour and \$3.96 cost per unlinked trip¹. BCT is responsible for transit system development, planning, and operations to promote a convenient user-friendly transit system, allowing for expanded transportation alternatives for Broward County residents and visitors.

¹ National Transit Database (NTD) Report Year 2017 Statistics





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 \$24,600 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 mile 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:

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

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 (BoCC). The plan includes educational outreach, seat drops on the bus for passengers, social media, print media, online media and face-to-face notification of the discontinuation by BCT, Florida Department of Transportation (FDOT), and South Florida Commuter Services (SFCS) staff on the route with affected passengers³.

The public hearing on the service proposal is scheduled before the Broward County Board of County Commissioners on January 29, 2019. 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.



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.

³ Appendix D: Public Outreach Plan

⁴ Appendix E: Public Meeting Notices

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 speaking passengers. In accordance with the LEP plan, if route changes are approved BCT will provide detailed information about the change in formats accessible to our LEP passengers⁵.

SERVICE CHANGE PROPOSAL

The FDOT, in partnership with BCT will discontinue the commuter express Route 107, which provides service to the residents of Pembroke Pines and Hollywood to the Miami Civic Center and Downtown Miami. This route is being discontinued due to non-performance as stated in Exhibit A, Page 4, Section 8.1 of the Joint Participation Agreement signed by FDOT and the Broward County BoCC dated September 15, 2015. There has been a consistent decline in ridership over the past several years; due to several factors:

- Route 107 was the first express route for BCT in 2010. Route 108 opened afterwards in 2011 with
 a more direct connection to downtown Miami with a larger park and ride only 1.5 miles away at
 the North Perry Airport. The Hollywood Hills stop competes with the Miami-Dade Transit (MDT)
 95 Express route, which opened after the 107 route started, which services the Sheridan Street
 Tri-Rail station only 2.3 miles away.
- The Route 107 travel time is longer than the nearest express route 108 due to the number of stop lights on Pines/Hollywood Blvd prior to entering the I-95 corridor. At peak hour, Route 107 it takes 1 hour, 20 minutes compared to Route 108 which is 55 minutes and the MDT 95 Express Route to the Civic Center which is 37 minutes.
- BCT and South Florida Commuter Service conducted a marketing campaign to promote the service from October through mid-November 2017. Marketing efforts⁶ included a direct mailer to 32,082 households, print ads for 6-weeks in community newspapers, and geo-targeted banner ads on the SunSentinel.com. Ridership continued to drop after the marketing efforts were completed⁷.

The FY 2018 annual ridership was 39,119 compared to the average annual express route ridership of the remaining express routes which was 111,529.

The riders which utilized the Pembroke Commons Park and Ride will be able to utilize the existing commuter express Route 108 at the North Perry Airport, and the riders which previously utilized the Hollywood Hills Plaza Park and Ride will be able to utilize the existing commuter express service provided



⁵ Appendix C: BCT LEP Context Map

⁶ Appendix H: Marketing campaign materials

⁷ Appendix I: Monthly Ridership of Express Routes for FY 2018

by MDT at the Sheridan Street Tri-Rail, which will provide a more direct north/south service along I-95, or they can register with SFCS (www.1800234ride.com) for their carpool or vanpool programs.

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

Title VI Major Service Changes

Route	Corridor	Description	Major Service Change?
107	Hollywood	Eliminate 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 major update in the 2nd quarter of 2018 is the primary data source for all equity analyses⁸. 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
- 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)



⁸ Appendix A: Demographic Analysis

- 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 proposal⁹.
- 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

On-board survey data for minority, low-income, age, trip purpose, frequency of use and vehicle availability per household were examined as shown in Appendix A, Demographic Analysis. A Service Equity Analysis was conducted on minority and low-income ridership of the route compared to BCT systemwide averages, as shown in Appendix J. The results indicated that although Route 107 is a Title VI Predominantly Minority (84.2%) route, the percentage deviation between the minority level for the reported ridership on the route compared to systemwide is not greater than the disparate impact burden threshold of -15%. The reported ridership is not indicated to be a Title VI Predominantly Low-Income route compared to total systemwide income, with 18.8% of riders indicating a household income of less than \$25K, much less than the systemwide average of 65.1%. This analysis concludes that the service change proposal to discontinue service for Route 107- 95 Express Hollywood will not cause disparate impacts or disproportionate burdens on Title VI protected populations.

⁹ 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 equity analysis found that the riders of the 95 Express Hollywood route are more likely to be minorities and have higher incomes when compared to the BCT systemwide average. The service equity analysis found that the service change proposal does not cause disparate impacts or disproportionate burdens on Title VI protected populations¹⁰. 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%	

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)	4.6%	No	-71.1%	No
Route Changes without Adverse Effects (Improvements)	N/A	N/A	N/A	N/A

RECOMMENDATIONS

The results of the service equity analysis revealed that though Route 107 has a slightly higher minority ridership base overall compared to systemwide averages, it is not a significant difference when calculated using BCT's standard disparate impact threshold. Likewise, the ridership base has a significant reported income that is much higher than the systemwide average; which is similar to the overall Premium Express Services' ridership having statistically much higher reported income. BCT can conclude from this analysis that the service plan will not create disparate impacts of disproportionate burdens on our Title VI



¹⁰ Appendix H: Service Equity Analysis Tables

protected passengers. BCT is comfortable that all requirements under FTA Circular 4702.1B have been satisfied to implement the service proposal.



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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.

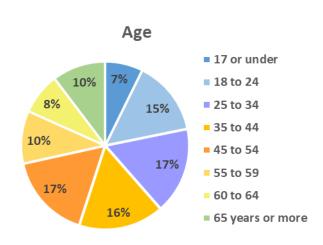
BCT uses a one-quarter mile buffer around local and limited stop routes to establish a service area. The 2017 BCT service area population is 1,909,632. From the latest American Community Survey 5-year estimates, the percentage of minorities in the service area is 61.9 percent and low-income population comprises 23.3 percent.

In 2018, BCT conducted a major update of the 10-year Transit Development Plan (TDP). A significant portion of the TDP was 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 Plan¹¹. On-board survey data was used for age, ethnic origin, income, number of vehicles in a household, trip purpose and frequency of use.

A summary of the findings related to BCT fixed route service is provided below:

Age

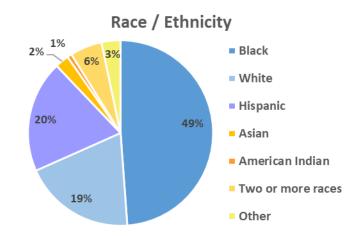
Over 82 percent of respondents are between the ages of 18 – 64. Seven (7) percent were under the age of 17 and ten percent are over the age of 65. The percentage of 65+ transit passengers is below the county proportion in the same age range.



¹¹ BCT Connected Transit Development Plan: http://www.broward.org/bct/pages/transitdevelopmentplan.aspx

Ethnic Origin

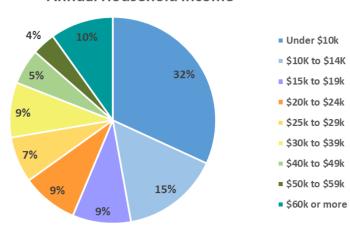
Minorities comprise over 80 percent of the transit passengers. Forty-nine (49) percent are Black/African American, 20 percent Hispanic, 12 percent Asian, 2American Indian, Multiracial or other. Non-Hispanic White passengers comprise 19 percent of BCT ridership.



Income

A typical BCT passenger has a very low income with over 65 percent of riders reporting household incomes of less than \$25,000 per year; however the percentage of passengers in upper incomes have continued to increase since 2008 due to the success of the Premium Express Services.

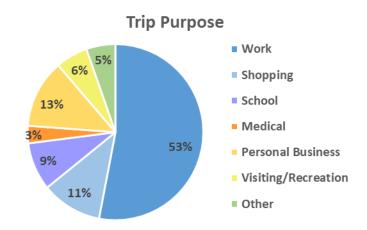
Annual Household Income





Trip Purpose

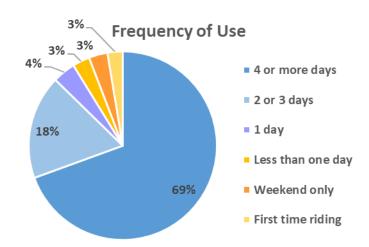
Most respondents, 53 percent, use BCT primarily for work, with personal business following with 13 percent and shopping at 11 percent.



Frequency of Use

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.

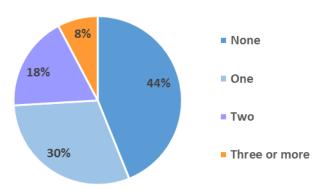




Number of Vehicles in Household

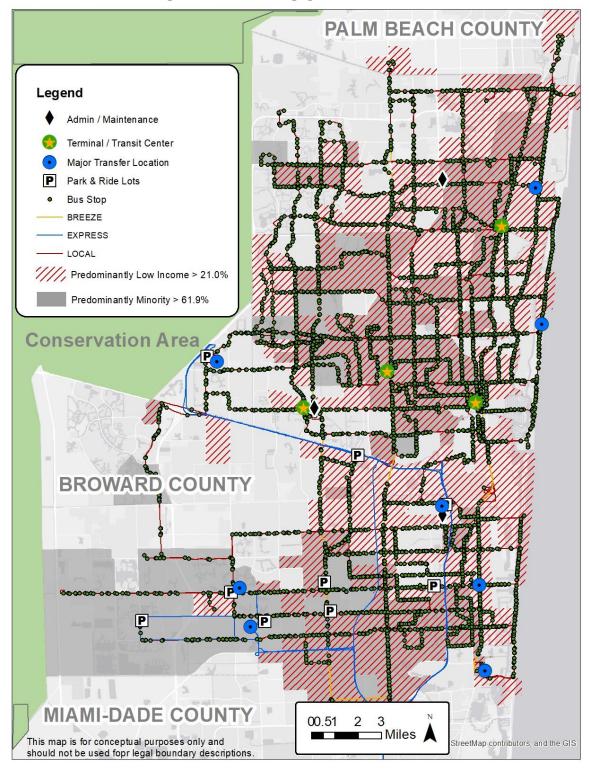
Most BCT passengers (nearly 44 percent) surveyed live in households where there are no motor vehicles available. Over 30 percent live in a household with only one vehicle. When considered along with household income and frequency, it is clear that a large segment of BCT users require transit because they do not have an alternative form of transportation.

Motor Vehicles per Household



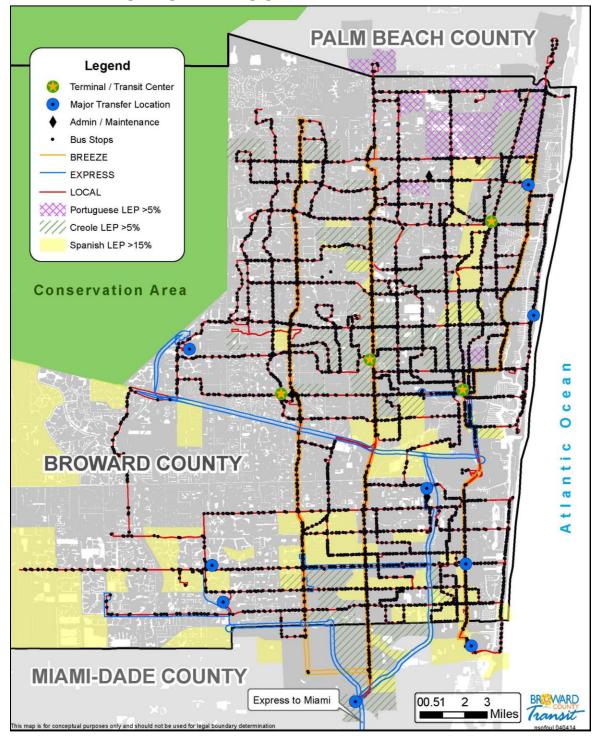


APPENDIX B: BCT TITLE VI CONTEXT MAP





APPENDIX C: BCT LEP CONTEXT MAP





APPENDIX D: PUBLIC OUTREACH PLAN

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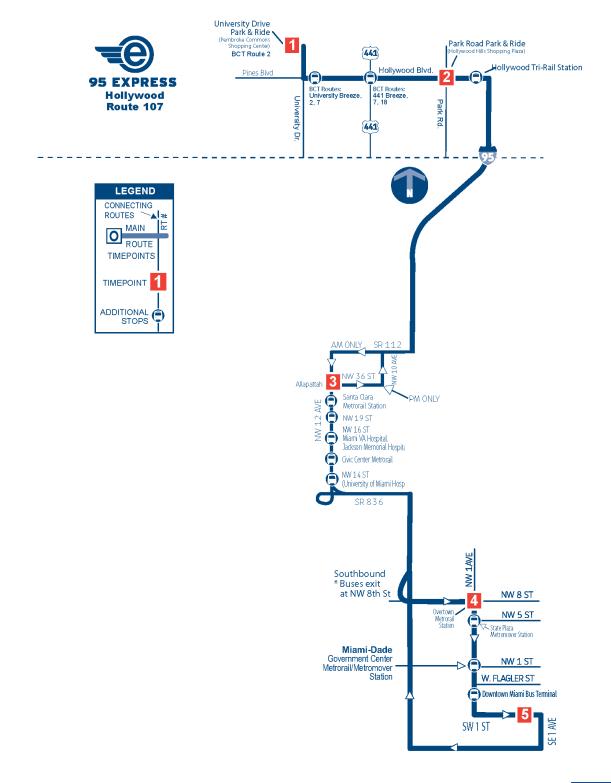


APPENDIX E: PUBLIC MEETING NOTICES

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APPENDIX F: ROUTE 107 MAP





APPENDIX G: ROUTE 107 SCHEDULES

NW 8 ST & NW 1 AVE

6:07a

6:41a

7:14a

7:50a

8:23a

8:56a

9:30a

5:59p

6:31p

SE 1 ST & SE 1 AVE

5

6:17a

6:51a

7:25a

8:02a G

8:35a G

9:08a G

9:42a G

SOUTHBOUND • University Drive Park & Ride to Miami Civic Center & Downtown Miami

The BCT 95 Expess bus stops at these location ONLY, Monday through Friday a.m. and p.m. peak hours.

1	University Dr.	& Johnson	St. (S)	(Pembroke	Commons	P&F
_						

- Pines Blvd. & University Dr. (E)
- (E) Hollywood Blvd. & US 441 (E)
- 2 Hollywood Blvd. & Entrada S (Hollywood Hills Park & Ride)
- Hollywood Blvd. & Calle Largo (Hollywood Tri-Rail)
- 3 Allapattah Metrorail Station
- Santa Clara Metrorail Station
- NW 12 Ave. & NW 19 St.
- Miami Veterans Hospital
- Civic Center Metrorail Station
- NW 12 Ave. & NW 14 St.
- 4 NW 8 St. & NW 1 Ave. (Overtown Metrorail Station)
- NW 1 Ave. & NW 5 St. (State Plaza Metromover Station)
- 5 NW 1 Ave. & NW 1 St. (Miami-Dade Government Center)
- (A) SW 1 Ave. & SW 1 St. (Miami Bus Terminal)
- (a) SE 1 St. & SE 1 Ave.

NORTHBOUND • Downtown Miami & Miami Civic Center to University Drive Park & Ride

NUMBERS IN BOXES REFER TO TIME POINTS ON MAP

JNIVERSITY DR PARK & RIDE

5:15a

5:45a

6:15a

6:45a

7:15a

7:45a

8:20a

5:21p

5:53p

HOLLYWOOD BLVD & PARK

2

5:32a

6:02a

6:32a

7:02a

7:33a

8:04a

8:39a

14 STREET & 12 AVENUE

6:01a

6:35a

7:08a

7:44a

8:17a

8:50a

9:24a

Times with the letter "G" after them indicate bus returns to garage.

NW 8 ST & NW 1 AVE	NW 8 ST & NW 1 AVE		HOLLYWOOD BLYD & PARK RD	UNIVERSITY DR PARK & RIDE
4	5	3	2	1
	6:17a			6:47a
	6:51a			7:21a
	7:25a			7:55a
3:40p	3:51p	4:05p	4:47p	5:11p
4:10p	4:21p	4:35p	5:19p	5:43p
4:40p	4:52p	5:06p	5:52p	6:17p G
5:10p	5:22p	5:35p	6:20p	6:44p G
5:40p	5:52p	6:04p	6:45p	7:06p G
6:15p	6:25p	6:36p	7:13p	7:33p G
6:50p	7:00p	7:10p	7:45p	8:05p G

- 4 NW 8 St. & NW 1 Ave. (Overtown Metrorail Station)
- NW 1 Ave. & NW 5 St. (State Plaza Metromover Station)
- NW 1 Ave. & NW 1 St. (Miami-Dade Government Center)
- SW 1 Ave. & SW 1 St. (Miami Bus Terminal)
- 5 SE 1 St. & SE 1 Ave.
- NW 12 Ave. & NW 14 St.
- Civic Center Metrorail Station
- Jackson Memorial Hospital
- NW 12 Ave. & NW 19 St.
- Santa Clara Metrorail Station
- Carta Glara Well-Glar Clatter
- 3 Allapattah Metrorail Station
- Hollywood Blvd. & Tyler St. (Hollywood Tri-Rail)
- 2 Hollywood Blvd. Park & Ride (Hollywood Hills Park & Ride)
- Hollywood Blvd. & US 441 (W)
- Pines Blvd. & University Dr. (E)
- 1 University Dr. & Johnson St. (S) (Pembroke Commons P&R)



APPENDIX H: MARKETING CAMPAIGN MATERIALS

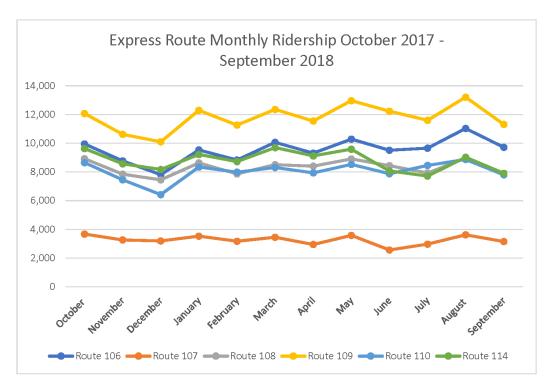








APPENDIX I: MONTHLY RIDERSHIP OF EXPRESS ROUTES FOR FY 2018



Route 106 - 95 Express - Miramar Regional Park to Miami Civic Center
Route 107 - 95 Express - Pembroke Pines/Hollywood to Miami
Route 108 - 95 Express - North Perry Airport to Miami Civic Center
Route 109 - 95 Express - CB Smith/Ansin Sports Complex Miramar to Downtown Miami
Route 110 - 595 Express - BB&T Sunrise/Griffin Tri-Rail to Downtown Miami-Brickell
Route 114 - 595 Express - BB& T Sunrise/Griffin Tri-Rail to Miami Civic Center



APPENDIX J: SERVICE EQUITY ANALYSIS TABLES

Minority Demographic Table

Race/Ethnicity	Route 107	BCT Systemwide Average
Black/ African American	42.1%	48.8%
White	15.8%	19.5%
Hispanic	21.1%	19.5%
Asian	0.0%	2.4%
American Indian	0.0%	0.8%
Multiracial	21.1%	5.6%
Other	0.0%	3.3%
Total Minority	84.2%	80.5%
Predominantly Minority?	YES	N/A

Source: BCT Connected Transit-Development Plan On-Board Survey, 2018

Low-Income Demographic Table

Household Income	Route 107	BCT Systemwide Average
Under \$10K	0.0%	31.8%
\$10K	6.3%	15.3%
\$15k to \$19,999	6.3%	9.2%
\$20k to \$24,999	6.3%	8.8%
\$25k to \$29,999	0.0%	7.2%
\$30k to \$39,999	12.5%	8.6%
\$40k to \$49,999	12.5%	5.5%
\$50k to \$59,999	12.5%	3.6%
\$60k or more	43.8%	9.9%
Less than \$25k	18.8%	65.1%
Predominantly Low-Income?	NO	N/A

Source: BCT Connected Transit-Development Plan On-Board Survey, 2018

Title VI Major Service Changes – Disparate Impact Assessment Table

Route	Service Type	Adverse Effects?	Mitigation	Minority Percentage	Systemwide Average	Deviation from Systemwide Average	Disparate Impact?
107	Express	Yes – Discontinuation of Service	BCT Express Route 108, MDT Express 95 Route, and Tri-Rail	84.2%	80.5%		
	Total				4.6%	NO	

 $Source: BCT\ Connected\ Transit-Development\ Plan\ On\ -Board\ Survey,\ 2018$



Title VI Major Service Changes – Disproportionate Impact Assessment Table

Route	Service Type	Adverse Effects?	Mitigation	Low- income Percentage	Systemwide Average	Deviation from Systemwide Average	Disparate Impact?
107	Express	Yes – Discontinuation of Service	BCT Express Route 108, MDT Express 95 Route, and Tri-Rail	18.8%	65.1%		
				Total	-71.1%	NO	

Source: BCT Connected Transit-Development Plan On-Board Survey, 2018



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

