

FEDERAL TRANSIT ADMINISTRATION

SUNRUNNER EQUITY ANALYSIS

FEBRUARY 2022

**PINELLAS SUNCOAST TRANSIT AUTHORITY
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INTRODUCTION

The Pinellas Suncoast Transit Authority (PSTA), as the public transit provider in Pinellas County, is required to submit to the Federal Transit Administration (FTA) a Title VI update that documents the level and quality of transit service provided for minority and low-income areas, pursuant to Title VI of the Civil Rights Act of 1964, as amended. This report is submitted every three years and is intended to demonstrate compliance with Title VI requirements that preclude discrimination in the provision of transit service and transit-related amenities.

The purpose of this plan is to assure that no persons, on the grounds of race, color, or national origin, is excluded from participating in, denied the benefits of, or subjected to discrimination in the implementation of the SunRunner Bus Rapid Transit service, which is a Small Starts project under FTA's Capital Investment Grant program. This report will provide a level of service analysis for this BRT corridor by assessing minority and non-minority Census tract samples and low income and non-low-income Census tract samples to assess PSTA's conformance with Title VI for this project.

POLICY STATEMENT

As a major provider of public transportation whose employees have extensive daily contact with the public, PSTA recognizes its responsibility to the community it serves and is committed to a policy of nondiscrimination. PSTA works to ensure non-discriminatory transportation in support of its mission to provide effective, coordinated, and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Pinellas County citizens.

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

FTA issues additional guidance and instruction for complying with the Title VI regulations in circular FTA C 4702.1B. The circular states the purposes of the Title VI program:

- a) *Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;*
- b) *Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;*

- c) *Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.*

The Environmental Justice component of Title VI guarantees fair treatment for all people and requires PSTA to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information that PSTA provides. Environmental Justice principles require PSTA:

- a) *To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.*
- b) *To ensure the full and fair participation by all potentially affected communities in transportation decision-making process.*
- c) *To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.*

Patricia Collins, Director of Human Resources and EEO officer, has been designated as PSTA's Civil Rights Officer, responsible for civil rights compliance and monitoring to ensure the non-discriminatory provision of transit services and programs. In addition, Jacob Labutka, Senior Planner, is responsible for implementing all aspects of the Title VI Program. However, along with the Chief Executive Officer, all directors, managers, and their staffs share in the responsibility for making PSTA's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by PSTA in its financial assistance agreements with the U.S. Department of Transportation (DOT).

SMALL STARTS REQUIREMENTS

FTA issues additional guidance and instruction for complying with the Title VI regulations for Small Starts project in circular FTA C 4702.1B. The circular states the following for FTA recipients receiving funding to implement Small Starts projects:

Service and Fare Equity Analysis for New Starts and Other New Fixed Guideway Systems

Transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project shall conduct a service and fare equity analysis. The service and fare equity analysis will be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of "major service change" as defined by the transit provider. All proposed changes to parallel or connecting service will be examined. If the entity that builds the project is different from the transit provider that will operate the project, the transit provider operating the project shall conduct the analysis. The service equity analysis shall include a comparative analysis of service levels

pre-and post- the New Starts/Small Starts/new fixed guideway capital project. The analysis shall be depicted in tabular format and shall determine whether the service changes proposed (including both reductions and increases) due to the capital project will result in a disparate impact on minority populations. The transit provider shall also conduct a fare equity analysis for any and all fares that will change as a result of the capital project.

IMPACT THRESHOLDS

Disparate Impact Policy

Disparate impacts are examined both when a Major Service Change is undertaken and/or a fare change is implemented. PSTA defines a disparate impact as any time there is a difference in impacts between minority and total populations of plus or minus ten percent that negatively impacts the minority population. For example, if the minority population makes up 30 percent of the overall population, but would bear 45 percent of the adverse impacts, there may be a disparate impact since the minority group bears 15 percent more than its expected share. The Disparate Impact Policy is applied uniformly to all modes of service operated by PSTA.

Disproportionate Burden Policy

The Disproportionate Burden Policy applies to adverse effects on low-income populations as a result of Major Service Changes and all fare changes. PSTA defines a disproportionate burden as any time there is a difference in impacts between low-income and total populations of plus or minus ten percent that negatively impacts the low-income population. For example, if the low-income population makes up 30 percent of the overall population, but would bear 45 percent of the impacts, there may be a disproportionate impact since the low-income group bears 15 percent more than its expected share. The Disproportionate Burden Policy is applied uniformly to all modes of service operated by PSTA.

Pursuant to Title VI requirements, PSTA advertises for public comment on these three policies that are presented on and open for public comment at PSTA committee and board meetings. Notices are placed on all buses in the Fleet, at all terminals, and highlighted on the PSTA website. These documents remain on the website with a link for people to review and send comments ongoing.

PUBLIC PARTICIPATION PLAN

PSTA's public outreach strategies are designed to provide the public with effective access to information about PSTA services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services.

PSTA has an ongoing outreach program that it implements on an annual basis. Ongoing outreach is augmented by recurring public outreach activities in support of specific projects. PSTA staff uses a wide

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variety of tools and programs to reach out to the community and inform, educate, and collect suggestions and comments.

Outreach tools:

- Community Presentations and Local Public Involvement Programs
- Travel Training/Travel Aids Program
- Transit Riders Advisory Committee (TRAC)
- PSTA Web Page
- Social Media
- Service Requests and Programmed Service Improvements
- Public Comment Opportunities
- Interior Bus Information
- Community Programs
- Surveys
- Outreach Exhibits
- Marketing Materials
- Media Outreach

PSTA has conducted extensive outreach in preparation for the SunRunner and will continue to do so as the authority prepares to launch the service in August 2022. Since October 2020, PSTA has directly reached out to 257 businesses, residents, and other parties affected by or interested in the SunRunner. PSTA also maintains two different websites related to the SunRunner where new information on the project is regularly provided:

- A construction information page where PSTA posts project details such as station locations, station types and timelines for various parts of the construction project. The site has received a total of 17,132 visits with 5,285 unique users.
- An interactive page where visitors can see a map of the project and provide feedback on improvements that should be made in the corridor and activities and uses that should be included in the area. PSTA has worked with the cultural competency firm Inclusivity, LLC to ensure that knowledge of this tool reaches diverse members of the community throughout the corridor. The site has received a total of 3,589 visits with 1,566 unique users.

PROPOSED SERVICE CHANGES

PSTA is planning to launch the SunRunner Bus Rapid Transit (BRT) service in August 2022. This 10.3-mile route will connect riders from downtown St. Petersburg to St. Pete Beach via the Central Avenue corridor. The route will have stations with level & multi-door boarding, transit signal priority, and Business Access Transit (BAT) lanes to improve transit travel times in the corridor.

PSTA currently operated two routes in the Central Avenue corridor where the SunRunner will operate. The Central Avenue Trolley (CAT) connects riders from downtown St. Petersburg to St. Pete Beach via Central Ave. Route 18 connects riders from downtown St. Petersburg to downtown Clearwater via Central Ave.

Given that the SunRunner will operate within the same corridor as the CAT and Route 18, PSTA is proposing the following changes to these routes:

- The Central Avenue Trolley's weekday headway will increase from 20 to 30 minutes.
- Route 18 will now terminate at Grand Central Station, which is approximately 2.5 miles west of its current terminus in downtown St. Petersburg. Riders will be able to transfer to right routes to/from Route 18 at Grand Central Station (including the SunRunner).

See Figure 1 for a map of existing routes in the Central Ave corridor.

See Figure 2 for a map of routes in the Central Ave corridor following the implementation of the SunRunner.

See Figure 3 for a map of the SunRunner with all station locations.

Figure 1: PSTA Routes in SunRunner corridor before service launch

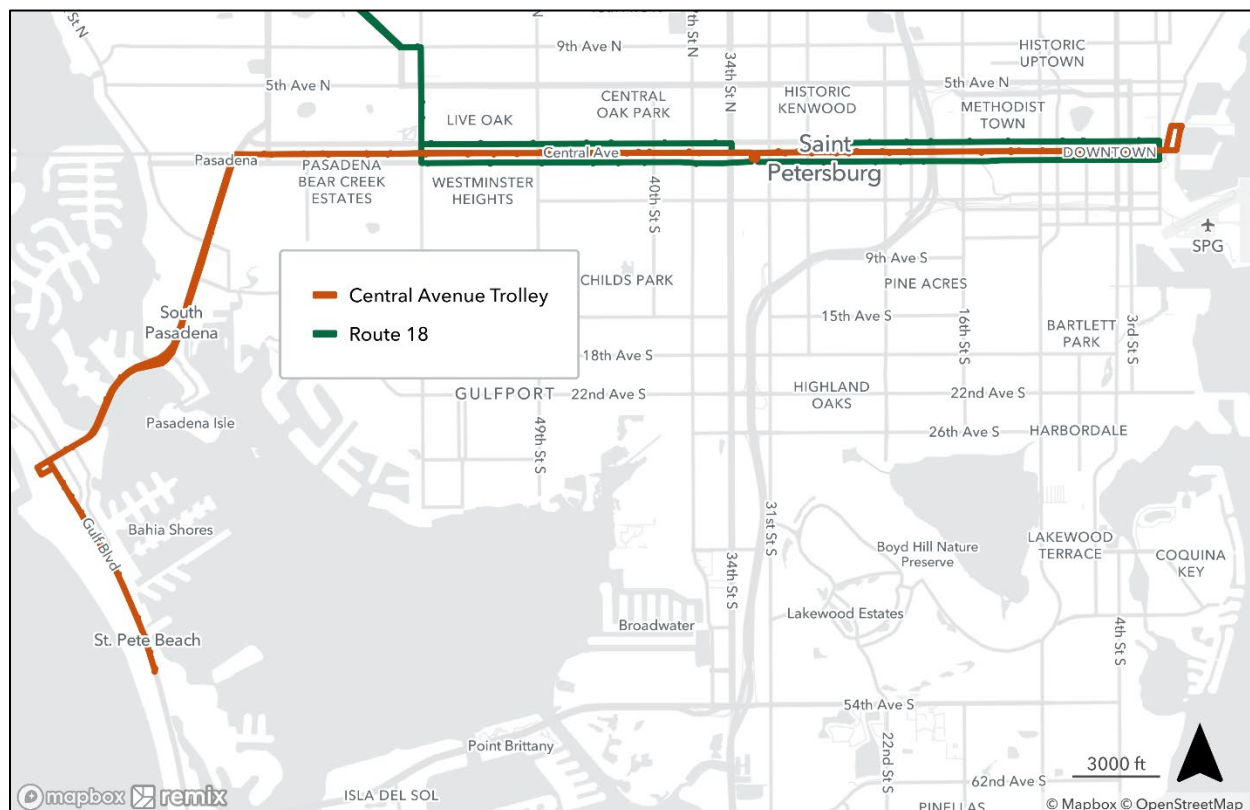


Figure 2: PSTA Routes in SunRunner corridor after service launch

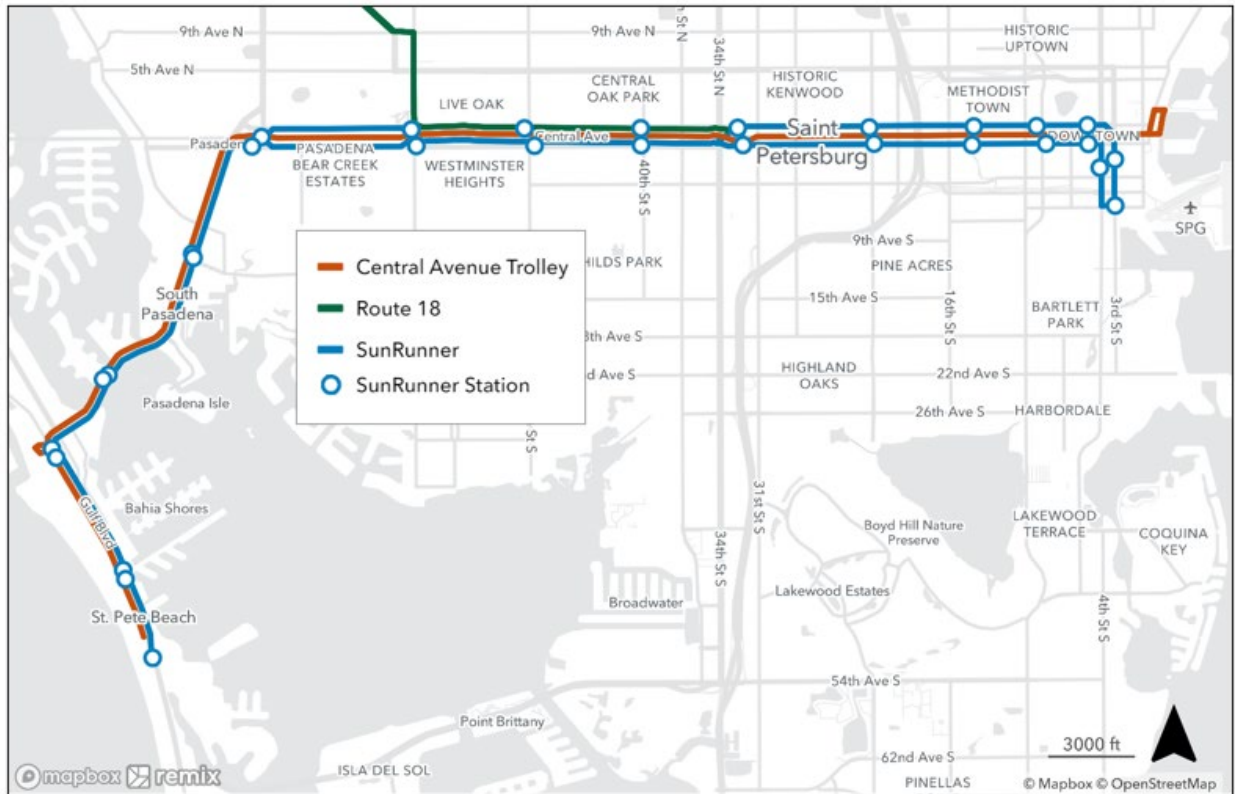
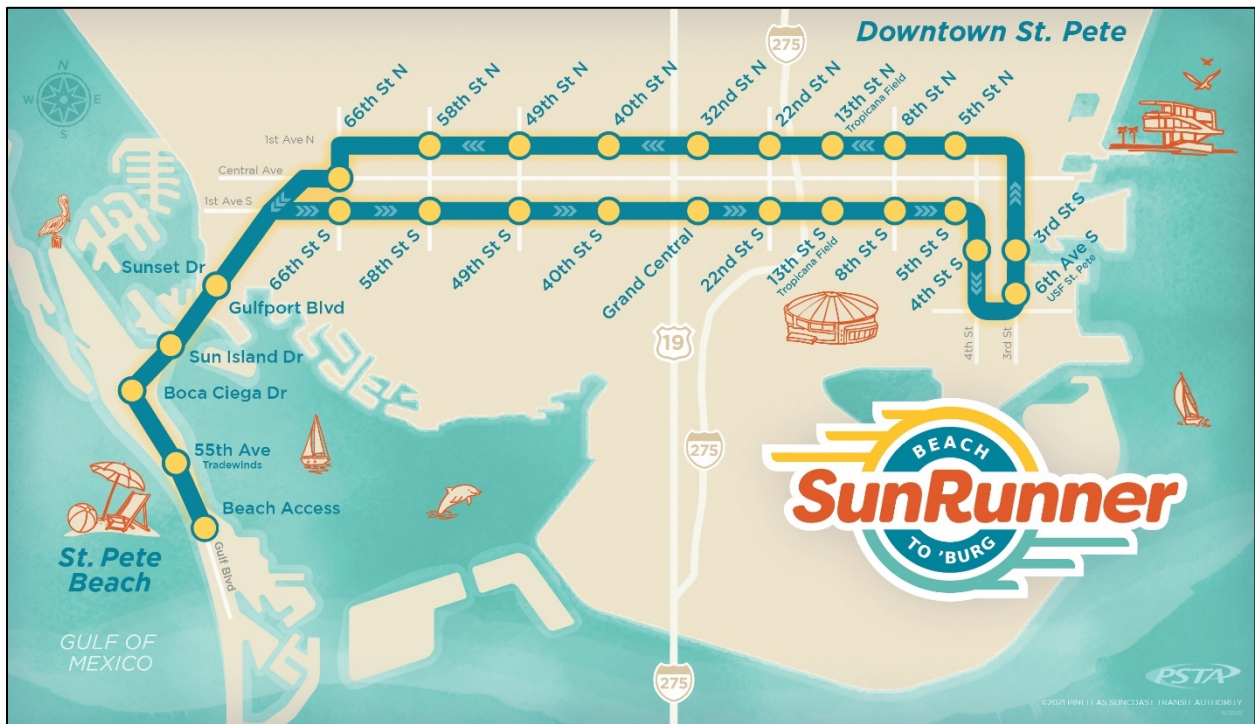


Figure 3: SunRunner map with station locations



PROPOSED FARE PAYMENT CHANGES

PSTA's fare payment system, Flamingo Fares, allows riders to utilize a smart card or mobile app to purchase fares to board public transit services in Pinellas County. Riders can reload funds online with a credit card or at a PSTA terminal with cash. PSTA is also developing a retail network where riders can purchase Flamingo Fares cards and reload fares with cash or credit cards at stores throughout Pinellas County.

SunRunner buses will not have GFI fareboxes that accept cash on board vehicles to expedite the boarding process and reduce total travel time along the route. Riders will tap their Flamingo card and or scan their app to pay fares to board the SunRunner. Riders who do not have a loaded Flamingo card and/or access to a smartphone to download the Flamingo app will be able to go to a nearby retail outlet to purchase their fare with cash or credit cards.

ANALYSIS OF PROPOSED SERVICE CHANGES

PSTA conducted two analyses of proposed service changes related to the implementation of the SunRunner:

- Service Equity Analysis – to assess the impact of service level and headway changes to routes in the SunRunner corridor
- Fare Equity Analysis – to assess the impact of not accepting cash on board SunRunner vehicles

SERVICE EQUITY ANALYSIS

Table 1 shows all routes that will be changed during implementation of the SunRunner and the minority and low-income population percentages within ¼ mile of the routes that are affected by the changes. Bolded figures in the table are plus or minus ten percent from the average of Pinellas County. This indicates that there may be a disparate impact (minority population) or disproportionate burden (low-income population). One route (Route 18) exceeds the disparate impact threshold by 0.4 percent and the disproportionate burden threshold by 2.2 percent. Changes borne by minority and low-income residents along Route 18 will be mitigated by the introduction of the SunRunner that will improve frequency and travel times in the corridor and the ability for riders to transfer using eight different routes to travel to/from Downtown St. Petersburg.

Table 1 also shows the collective impact of the proposed service change on minority and low-income residents, which is within two percent of the total minority and low-income population proportions of Pinellas County. Therefore, the introduction of the SunRunner service and modifications to parallel routes collectively do not create a disparate impact or disproportionate burden.

See Figures 4 and 5 for maps of the SunRunner route that show how the route serves minority and low-income block groups, respectively, where the population percentage exceeds Pinellas County as a whole.

Table 1: Service Equity Analysis

Route	Change Borne by Minorities	Change Borne by Low Income
Rt 18	36.4%	24.4%
CAT	26.4%	15.0%
SunRunner	29.8%	17.1%
<u>All Changes</u>	<u>27.8%</u>	<u>14.2%</u>
Pinellas County Population	26.0%	12.2%

Figure 4: Minority block groups along the SunRunner

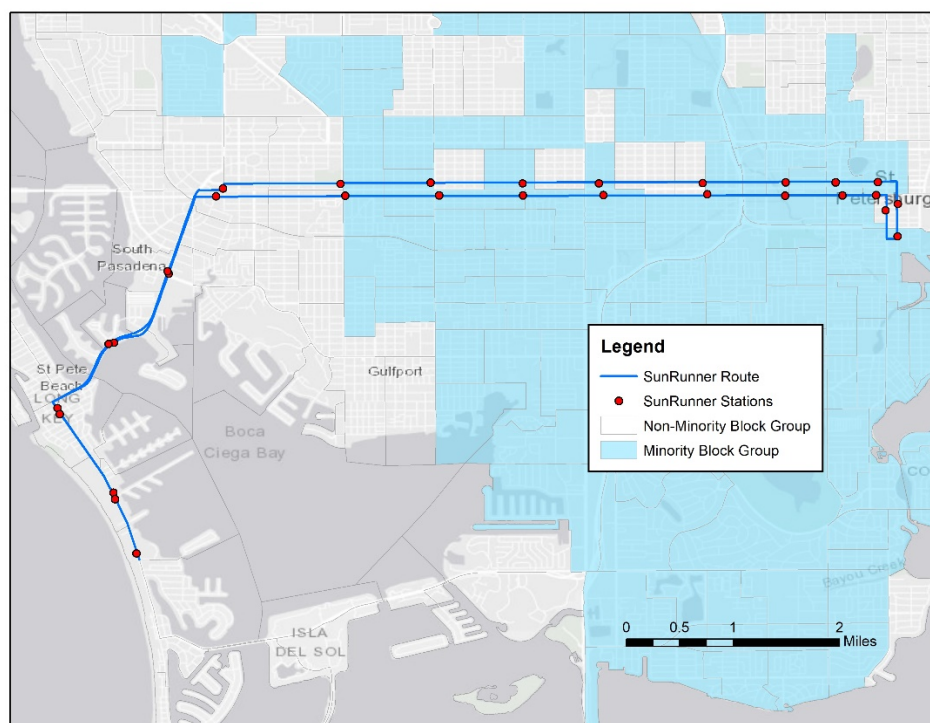
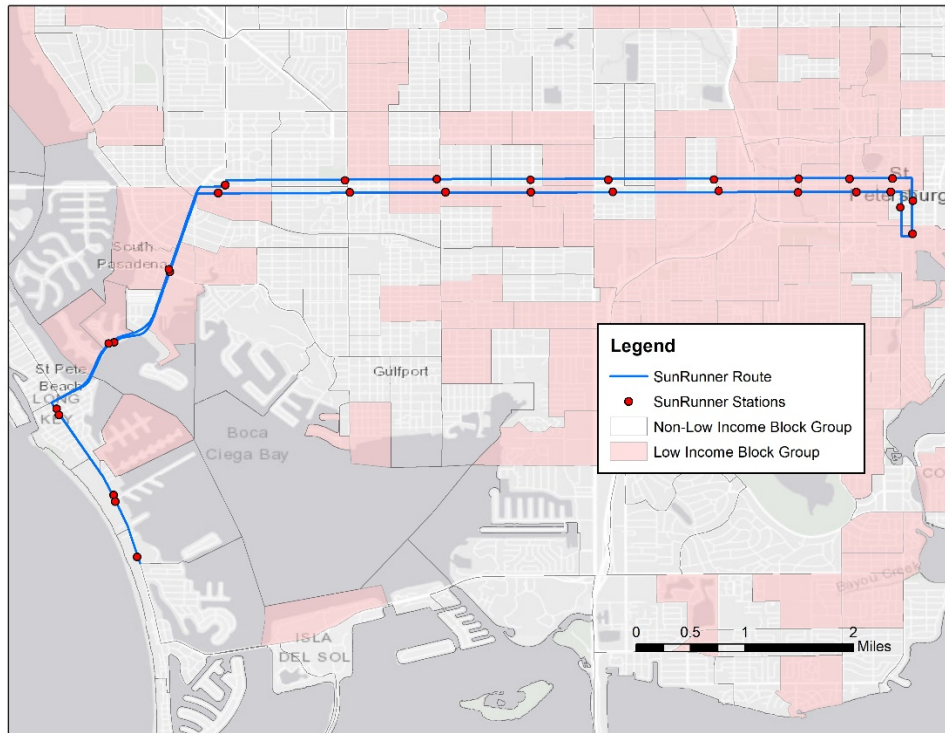


Figure 5: Low-income block groups along the SunRunner



FARE EQUITY ANALYSIS

PSTA is proposing to not install fareboxes on board SunRunner vehicles. As a result, cash will not be accepted as a form of payment on board the vehicles. PSTA will mitigate this future proposed change by promoting the existing Flamingo Fares payment system, which allows riders to load funds onto a smartcard or mobile app. Riders will benefit from fare capping, which limits funds riders spent on transit rides to \$5 a day and \$70 a month for regular fare and \$2.50 a day and \$35 a month for reduced fare. SunRunner riders who need to purchase a card or reload funds at a store with cash or a credit card will be able to utilize a retail network with participating outlets near all stations. PSTA will ensure that at least 50% of participating retail outlets are within ¼ mile of station locations and 100% are within a half mile of station locations. PSTA will not charge fares on the SunRunner for at least the first six months of service. This will allow riders to easily use the service while PSTA promotes this future fare payment structure. PSTA will extend the fare free period past six months after the service launches if the retail network is not in place near all SunRunner stations at that time.

PSTA evaluated this proposed fare change for the potential effects on customers that currently use cash. Riders that use cash will need to pre-pay for their trips at the Flamingo Fares retail network. PSTA utilized data from the 2018 on-board survey to assess the impact of this change on riders that use cash on routes in

the SunRunner corridor. The data for this analysis comes from the 970 responses from riders who utilized the Central Avenue Trolley and Route 18.

% of Total	Usage by Group		
Fare Type	Minority	Low-Income	All Riders
Cash	23%	23%	27%
GO Card	35%	33%	27%
Passport	8%	10%	10%
UPASS/CPASS	7%	10%	9%
Other	22%	23%	29%

Table 2: SunRunner Fare Equity Analysis

As shown in in Table 2, cash users account for 27% of all trips taken in the SunRunner corridor, including 23% of minority trips and 23% of low-income trips. The difference between minority and the total riding group's usage of cash is four percent, which shows that a disparate impact was not found since the difference is less than ten percent. The difference between low-income and the total riding group's usage of cash is four percent, which shows that a disproportionate burden was not found since the difference is less than ten percent. Minority and low-income usage of all other fare types is within ten percent of the total riding group's usage. The proposed fare payment system does not create a disparate impact or disproportionate burden for riders.

CONCLUSION

The equity impacts of the implementation of the SunRunner BRT service were analyzed and determined to not collectively create a disparate impact or disproportionate burden. Minority and low-income populations are not disproportionately affected by the changes to routes in the corridor or by the elimination of cash as a payment method on board SunRunner vehicles. PSTA will continue to ensure that the SunRunner is easy and accessible to ride by conducting extensive public outreach in preparation for the both the service launch and after the initial fare free service period ends.

APPENDIX

Service Equity Analysis Methodology

PSTA utilizes the transit planning software Remix to conduct Title VI analyses. Remix includes an analytic tool specifically designed for Title VI. The tool compares geographic and demographic coverage of a transit network between two booking periods. Below is the description Remix provides regarding their data sources and methodology:

1. Get the population near a route, including its low income and minority percentage.
 - For each route, build a shape that represents the area within quarter mile of any of its stops.
 - Intersect the catchment area with the 2015-2019 ACS Census data. Get a list of block groups and the percentage overlap with each.
 - For each block group, take the percentage of overlap and multiply it by the block group's statistics.
 - Get the population, minority population, and low-income population for each group and sum them together. This is the total population a route could serve.
2. Compare the number of people-trips, before and after.
 - Multiply the population near a route times the number of trips it makes (per year) to get "people-trips".
 - Repeat for low-income and minority populations to get "low-income people trips" and "minority people trips".
 - Compare these numbers between the before and after versions of the route, to get a set of people-trip differences. We match before and after using routes that have the same name.
3. Get the total difference in people-trips across the transit system.
 - Repeat the process above for every route in the transit system.
 - Sum together the difference in people trips. This will return three numbers: total difference in people-trips, total difference in low-income people-trips, and total difference in minority people trips.
4. Calculate the change borne by low-income and minority populations.
 - Divide the total difference in low-income people trips by the total difference in people-trips to get the percentage of change borne by those with low incomes.
 - Repeat for minority people-trips.
5. Compare the percentage change to the average in the service area.
 - Calculate the average percentage of low-income and minority populations across the entire service area.

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- Subtract from the change borne by those populations.
- Get two final numbers: the delta between the impact this set of transit changes had on low income and minority populations compared to any average change.

The following is a list of data sources Remix utilizes to compute its figures:

- Census data is provided by the US American Community Survey, 2015-2019.
- Population is coded by table B03002, field B03002001.
- Low-income status is set at 100% of the US poverty level. This is coded by the appropriate fields in table C17002.
- Minority status is coded by table B03002, by subtracting the white, non-Hispanic population (B03002003) from the total population (B03002001).
- Service area is a set of block groups determined by the shapefile PSTA provided to Remix.
- Map and routing data is provided OpenStreetMap, Mapbox, and Valhalla.

See below for tables that shows the calculation methodology as described above.

	Before			
Route	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)
Rt 18	50,583	15.1%	29.4%	28,010
CAT	20,747	15.1%	26.4%	31,540
Sunrunner	0			0
All Changes (both directions)	59,285	14.4%	26.6%	59,550

	After (Inbound)			
Route	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)
Rt 18	43,170	13.7%	28.4%	27,500
CAT	20,747	15.1%	26.4%	25,420
Sunrunner	14,658	17.1%	30.6%	47,450
All Changes (both directions)	59,649	14.3%	26.5%	124,095

	Difference				
Route	People-Trips (Population * Trips)	Low Income People-Trips	Minority People- Trips	Change Borne By Low Income	Change Borne by Minorities
Rt 18	-148,857,455	-36,334,000	-54,256,415	24.4%	36.4%
CAT	-121,487,610	-18,280,071	-32,058,090	15.0%	26.4%
Sunrunner	571,511,525	97,507,169	170,179,425	17.1%	29.8%
All Changes (both directions)	301,166,460	42,893,098	83,864,920	14.2%	27.8%