

TITLE VI PROGRAM

PORT AUTHORITY OF ALLEGHENY COUNTY d/b/a PITTSBURGH REGIONAL TRANSIT

2025 - 2027

Summarizing Service Years 2022 - 2024

Final Version with Board Approval

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CHAPTER 1 GENERAL REQUIREMENTS

Title VI Assurances on Applications for Financial Assistance from the Federal Transportation Administration

Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit (PRT) has completed all assurances on applications for financial assistance from the FTA. These assurances can be found in Appendix A.

Communication and Public Participation Plan

GOALS

PRT provides safe, reliable, and affordable public transportation throughout Allegheny County, Pennsylvania. Our mission is to advance our region by investing in our communities and connecting people in a safe, equitable, and reliable manner. To ensure that PRT is effectively meeting the needs of the communities we serve, it is essential that we better understand the needs of those communities when making decisions on projects, services or other changes taking place that will have an impact to residents of those communities.

PRT encourages and seeks productive involvement of the public by providing information, soliciting feedback, and communicating changes that encourage services and programs that are reflective of the values of all segments of the communities we serve. PRT developed the Public Participation Plan to ensure all members of the public – including minorities, individuals with disabilities and Limited English Proficient (LEP) populations have meaningful opportunities to participate in the decision-making process.

PRT also recognizes the importance of having a variety of public stakeholders in the decision-making process. Public Stakeholder groups can include but are not limited to residents who live in Allegheny County; riders and non-riders of transit; community-based organizations and stakeholder groups; municipal officials; businesses; and elected officials at all levels of government; metropolitan area agencies; major employers; and the public.

As a recipient of federal funding, and pursuant to Federal Transit Administration (FTA) Title VI regulatory guidance, PRT has a responsibility to consider the viewpoints of all individuals and entities, including minority and low-income populations, as well as individuals who do not speak English fluently “in the course of conducting public outreach and involvement activities” (FTA Circular 4702.1B).

The public participation process allows PRT to directly hear from several populations throughout Allegheny County and has designed strategies to inform and engage the public about services, projects, and other agency-related matters of significant interest. PRT may modify its public participation strategies based on feedback from its customers and the public. The plan is subject to change and may vary in strategy based on the needs of the those with whom we are engaging and the purpose and goal of the communications.

Public communication may involve but is not necessarily limited to the following public and stakeholder individuals and groups:

- Transit Riders
- Community Stakeholder Groups
- Neighborhood Organizations
- Allegheny County Transit Council (ACTC)
- Citizens for Accessible Transportation (CAT)
- Municipal Officials
- Business Owners
- Elected Officials
- Metropolitan Planning Organizations
- Government Agencies

COMMUNICATIONS AND PUBLIC PARTICIPATION

PRT uses a variety of methods to communicate with both the public and with subpopulations such as minority groups and LEP populations within its service area. PRT's website, news releases, advertisements, brochures, public meetings, email lists, and community outreach presentations are all used to disseminate information to the public at large and to affected citizens. The following are some of the methods employed by PRT to communicate with the public:

PRT Website

Information regarding public meetings/hearings, capital projections, transportation studies and service changes is posted at PRT's website, www.rideprt.org. The website is also used to collect feedback during public comment periods and provides telephone and email contact information for PRT Customer Service (including a TTY number for the speech- and hearing-impaired).

Public Meetings/Public Hearings

Public meetings/hearings are held in locations that are convenient to several communities, are accessible via public transportation and accessible to persons with disabilities, with accommodations made for individuals who are deaf and/or visually impaired (interpreters, braille meeting documents, etc.).

Outreach for capital projects typically includes several rounds of public meetings in multiple locations as needed to provide updates on the progress of transportation studies and collect community feedback. Public meetings and hearings provide opportunities for written or spoken testimony/comments from citizens. These events are advertised using newspaper advertisements, news releases (and subsequent media coverage), PRT's website, social media, print brochures/cards, on-vehicle advertising, community/government outreach and other means.

Public meetings/hearings include various meeting platforms developed and highlighted as significant and meaningful opportunities to continue public engagement during the COVID-19 pandemic were necessary to provide information, solicit feedback and communicate in newer and potentially unconventional formats. The pandemic changed the way PRT communicated to the public on a regular basis and offered an opportunity to expand upon the traditional methods of communications and reach a wider audience.

Pursuant to the PRT Board Policy for Public Hearing Process, public hearings inviting public comment have been adopted as the primary mechanism to assure public participation in decisions involving all fare increases as well as major service reductions. Public comments are scrutinized for concerns regarding disparate impact relevant to Title VI analysis and policy.

E-Newsletters/Email Lists

PRT often creates project-specific email lists, collecting email addresses from interested individuals on our website or at meetings and sending project updates and notification of upcoming meetings. Individuals may also sign up for email notification of service detours.

Direct Mail

PRT continues to use direct mail services to target specific audiences. Through this service, PRT can purchase mailing lists to reach target audiences not only in their postal mailbox, but electronically as well. Direct mail services have been utilized to provide information to residents and businesses located near PRT construction projects that have the potential to be significantly impactful and/or disruptive.

Newspaper Advertising

Public meeting and public hearing advertisements about capital projects or transportation studies are placed in print/electronic form in the region's two largest newspapers, the Pittsburgh Post-Gazette and the Pittsburgh Tribune-Review. Public meetings and public hearings are also advertised in the New Pittsburgh Courier, a Pittsburgh-based newspaper that features topics of interest in the African American community. Ads may also appear in the region's free weekly, the Pittsburgh City Paper.

Digital Advertising

In this new age of digital advertising and promotion, PRT utilizes advertisements on major radio and television news websites to reach target audiences we may otherwise miss. These ads are relatively inexpensive and have proven to be effective in reaching key demographics, including minorities.

Radio Advertising/Promotions

Overall, PRT no longer buys much radio advertising. However, we have been successful in reaching our minority riders through a partnership with a local radio station, WAMO-FM. In the past, we've worked with WAMO for special events/live remotes to promote new services/technologies at key park and ride locations.

News Releases & Media Relations

In addition to traditional advertising, PRT uses the news media to disseminate information on important announcements, service changes, capital projects, and transportation studies via news releases to local and national media outlets, including newspapers, television stations, radio stations, websites and blogs. National trade media and numerous local organizations, businesses, community leaders and elected officials are also included on our news release distribution lists. PRT communications staff also coordinates and conducts interviews with print and broadcast media to provide more detailed and in-depth information on important PRT news.

Advertising on Buses/Light Rail Vehicles

Public meeting and public hearing ads regarding capital projects, service changes and transportation studies are advertised on PRT buses and light rail vehicles in the interior advertising spaces.

Brochures/Take-One Cards/Rider Alert Cards

Important announcements about capital projects, public meetings, and service changes are also distributed via printed brochures or cards that are placed in locations easily accessible to riders, including on PRT vehicles, at the agency's Service Center and in schedule racks. Braille versions of print brochures are created as needed.

Community Outreach

PRT maintains relationships with community groups and local organizations (including neighborhood groups, social services organizations, disability groups and senior citizen communities) to regularly conduct informational presentations regarding capital projects, transportation studies, service changes and other topics. A summary of outreach efforts, and whether they took place in minority communities, can be found in Appendix B.

Additionally, PRT periodically deploys street teams to distribute information at various community events that target specific audiences, including minorities.

The COVID-19 pandemic created a significant disruption to in-person communication efforts for several years and impacts on approaches to conducting meetings and other communication methods have remained very different from the pre-pandemic era. At the beginning of the pandemic, communications efforts were transferred to primarily virtual meetings utilizing platforms such as Microsoft Teams, Zoom, Google Meet, telephone, conference call technology and other platforms as requested by meeting participants, and many meeting participants still prefer to utilize these online and virtual meeting participation options.

American Sign Language (ASL) and other interpreter services were provided at in-person and virtual public meetings, and additional services were provided upon request with notification to the public as to how to request additional services beyond ASL interpreter services. Braille items and other printed formats were provided upon request.

Government Relations

PRT's relationships with elected officials at all levels of government provide another avenue for reaching citizens with important information. Information on capital projects, transportation studies and service changes affecting specific constituencies is shared with elected officials; print materials are often provided and community presentations scheduled as needed.

PRT has enhanced engagement efforts with municipal governments to optimize communication efforts with residents. Information is often shared with elected officials in advance of public meetings to expand outreach opportunities to their constituencies.

Additionally, PRT has implemented a Speakers Bureau that would allow for staff to present information and initiatives to stakeholder groups and interested parties throughout the service area upon request.

Stakeholder Relations

A network of communication with stakeholder groups is maintained and kept up to date on major happenings impacting PRT, its riders and the community at large. Key stakeholders include economic development groups, tourism councils, nonprofit consortiums, foundations, advocacy groups and transportation management associations, among others.

Advisory Groups

PRT meets monthly for ten months out of the year with the Allegheny County Transit Council (ACTC). ACTC is a volunteer organization established in 1984 pursuant to PRT's state enabling legislation, which operates under an elected advisory board independent of PRT. The members of ACTC are frequent transit users. ACTC communicates rider questions and concerns to PRT. The PRT appointed liaison, part of PRT's Government Relations department, offers updates and provides educational opportunities surrounding PRT products, services and initiatives at council meetings.

PRT also meets quarterly and on an as needed basis with the Committee for Accessible Transportation (CAT). The CAT committee is a volunteer advisory group formed to identify ways to improve public transit for older adults and individuals with disabilities.

Customer Service

PRT's Customer Service phone line is open 365 days a year for riders and citizens to ask questions, voice concerns and provide comments. Customer Service may also be emailed via Authority website. Additionally, PRT's centrally located Service Center is a hub of information on the latest Authority news, providing brochures, route schedules, take-one cards and signage highlighting important announcements. Customers can also have a translator join the call if they speak another language.

Social Media

PRT's Communications Department also maintains social media accounts as a method of direct communication with riders on topics including (but not limited to) capital projects and service changes. PRT's primary social media account is on Twitter. PRT also maintains Facebook accounts for specific projects, including an account with information on our ConnectCard smart card system. Additional sites where PRT maintains a social media presence include YouTube and Flickr, and PRT also posts information on its blog, hosted by Blogger.

Operations/Service Planning Notices

PRT's Service Planning & Evaluation Department maintains continuous contact with transit riders to make adjustments as changing developments and rider preferences dictate. In cases of provisions of new service, revisions to existing service and elimination of service, these changes are discussed with the citizens and public officials of the affected areas. Notices of such changes are posted on PRT vehicles and PRT website and are made available to media through the Communications Department. Public hearings and advertised public meetings are held when major service reductions are proposed.

Ensuring Meaningful Public Participation

When PRT is considering major changes to its system, either through a major change in service, fares, major capital project, or other significant change to the agency, the Communications Department ensures inclusive and representative participation from the public, mainly in the

form of public meetings and web-based feedback forms. When a major change is proposed, PRT employs a variety of tactics to advertise these meetings and the opportunity to provide online feedback. Additionally, PRT can now accommodate non-English speaking individuals who wish to participate in rider satisfaction surveys via a 1-800 number that connects them to an English translation service.

Traditional Outreach

Meetings and online resources are advertised in the local newspapers, as well as on TV and radio news channels. Meeting notices are also placed on board transit vehicles, and on PRT's website. Print materials, such as brochures and cards, are also made available at community events in affected communities as well as PRT locations. All materials detail meeting times and locations, as well as the opportunity to provide input online for those unable to attend meetings.

Non-Traditional and Targeted Outreach

Community Organizations

PRT's Government Relations, Planning and Community Outreach staff attend local community meetings and community events when changes specifically affect said communities to ensure that information is properly communicated to the appropriate PRT department and/or staff for consideration in decision making processes.

Ensuring Inclusive Participation of Minorities

If proposed changes include a large portion of the minority community, notice of any public meeting is also included in the local African American newspaper, the New Pittsburgh Courier, and other local publications that reach minority audiences. The Community Outreach department staff also specifically contacts representatives of organizations that serve minorities to ensure awareness and participation and attends numerous community events in these areas to ensure awareness of these meetings.

Ensuring Inclusive Participation of Limited English Proficient (LEP) Persons

Though PRT does not meet the threshold for translating vital documents into other languages due to the extremely limited non-English proficient population, it has begun specifically developing materials in Spanish as this population is growing in the region. Notification of public meetings is now printed in both English and Spanish for take-one cards available at PRT locations, and translators are on call at public meetings in neighborhoods with a significant Spanish speaking population. See Appendix B for a summary of outreach efforts made to minority and LEP populations.

Number of Meetings

The number of meetings is dependent on the specific topic at hand – a proposal for a major change to fares might have 2-3 larger public comment meetings, whereas a planning project might have a handful of smaller, community-oriented meetings. The opportunity to comment on the proposal through a PRT-hosted website always is available for at least 30 days, if not 45 or 60 days.

Meeting Locations

Meeting locations are determined after the number of meetings has been determined. Downtown Pittsburgh is the most central location for meetings and would be the primary target for a meeting location, as 80 of the 99 transit routes that PRT operates enter Downtown. If more than

one meeting will occur, the Oakland neighborhood east of Downtown Pittsburgh is also a job and population center with significant transit service. If more than two meetings are needed, PRT will have meetings in geographically unique areas to try and serve as many people in Allegheny County as possible. Meeting locations are also chosen with maximum physical accessibility in mind for people with physical disabilities.

Meeting Times

If multiple meetings are needed, the times of day and days of week of each meeting will be different to reach as broad a population as possible for those who do not have traditional workday structures.

Meeting Structures/Formats

PRT employs a variety of meeting formats to be as inclusive as possible when asking for public comment/helping the public to understand proposed changes. Meeting formats almost always include verbal public comment directed at Senior Staff and the Board, but written comments are also accepted via paper or electronic format. Meetings also often include smaller informational tables so that the public can learn about services or proposed changes in an individualized format and not feel overwhelmed. Visual and auditory tools (such as video and maps) are also used for those who are not proficient in written English, have low literacy skills, or have mental disabilities.

Conclusion

PRT provides safe, reliable, and affordable public transportation throughout Allegheny County, Pennsylvania. Our mission is to connect people to life. To ensure that PRT is effectively meeting the needs of the communities that we serve, it is essential that we better understand the needs of those communities when making decisions on projects, services or changes taking place that have an overall impact to residents of those communities.

PRT has implemented a significant communications strategy that allows for a public participation process to be designed around each individual public engagement opportunity to ensure the best outcomes. PRT will continue to evaluate the public participation processes in place to ensure that the goals of PRT to provide meaningful access to information and meaningful opportunities to provide feedback continue to exist and that opportunities to expand public participation are regularly considered.

PRT will seek to identify new and expanded opportunities to engage the public at appropriate intervals surrounding changes to products, services, and development of PRT projects. The PRT Public Participation Plan is not limited to the specific means of communication with the public shared throughout the plan but allows for the opportunity for growth and development of both existing and newly identified methods of communication that provide the most successful outcomes for public participation and engagement.

Language Assistance Plan (LAP)

PRT has developed a Language Assistance Plan to ensure meaningful access. The LAP is a separate document used by many PRT Departments and is included as Appendix C.

Membership on Non-Elected Planning Boards, Advisory Councils or Committees

Title VI states that “recipients that have transit-related, non-elected planning boards, advisory councils or committee, 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.”

PRT has reviewed the FTA Circular language in more detail concerning transit-related boards and can confirm that no transit-related boards or committees are appointed by members, officers or staff of PRT; the Allegheny County Transit Council is a self-appointing body, as is the Committee for Accessible Transportation. PRT Board members, officers and/or staff are not involved in the selection or appointment of members for these groups. Finally, PRT does not appoint members to its Board; rather PRT’s 11-member Board is appointed by the Governor, State Legislature and Allegheny County Executive pursuant to PRT’s enabling legislation, Pennsylvania’s Second-Class County Port Authority Act, as amended.

Ensuring Compliance with Sub Recipients

As of this Title VI Program update, PRT confirms that it has no active federal transit funding sub recipients or federal transit funding sub recipient agreements in place and does not have any plans to enter into any such agreements. If PRT were to enter into any subrecipient agreements in the future, it would ensure that these agreements require the subrecipient to comply with Title VI and that PRT would have mechanisms in place to monitor and enforce subrecipient compliance.

Fixed Facility Impact Analysis

During the 2022-2024 program cycle, PRT conducted a Title VI analysis to evaluate prospective sites for a new service and maintenance facility. The analysis, which was conducted in November 2024, compares the population which would be impacted by the construction and operation of a new facility at each of 7 prospective sites. As of the preparation of this report, no site has been selected, so the full Title VI analyses will be included with the next program submission assuming PRT moves forward with site selection at that time.

CHAPTER 2 SERVICE STANDARDS AND POLICIES

System Wide Service Standards

PRT maintains Service Standards which outline how services are to be monitored, evaluated, and updated on an annual basis. There are many components to these standards in addition to those required in this Title VI Program. The newly adopted Transit Service Standards can be found in Appendix D.

Vehicle Load

Maximum acceptable passenger loads are as follows in the approved Transit Service Standards:

	Rapid Routes		Commuter Routes	Local and Coverage Routes
	LRT	BRT		
Weekdays				
Peak	200%	120%	120%	120%
Off-Peak	100%	100%	100%	100%
Saturdays				
All Day	100%	100%		100%
Sundays				
All Day	100%	100%		100%

Vehicle Headway

Maximum acceptable headways are as follows in the approved Transit Service Guidelines:

	Rapid Routes	Commuter Routes	Local Routes	Coverage Routes
Weekdays				
Early Morning	30	--	60	75
AM Peak	15	3 trips	30	60
Midday	20	--	60	75
PM Peak	15	3 trips	30	60
Evening/Night	30	--	60	75
Saturdays	30	--	60*	90*
Sundays	30	--	60*	90*

**If the route has service at this time of day/day of week.*

On-time Performance

On time performance of bus routes is considered by PRT to be arriving at the end of a route segment between one minute early and five minutes late. For the years 2019-2022, the acceptable level of performance for the system was 75% on time; further broken down by mode as 85% for BRT, 90% for LRT, 75% for local and coverage routes, and 80% for commuter routes.

Service Availability

Transit services should serve at least 80% of the Census tracts in Allegheny County. Serving a Census tract is defined as having a transit stop within the tract. As Census tracts are based on population within them, PRT feels that this is an appropriate measure of attempting to serve as many people within Allegheny County as possible.

Additionally, services should serve at least 40% of the population, defined as the centroid of a Census tract being within a ¼ mile walk of a bus stop or within a ½ mile of a bus, incline, or light rail fixed guideway station, as measured by a street/sidewalk network.

System Wide Service Policies

Distribution of Transit Amenities Policy

Transit amenities provided by PRT include ticket vending machines, seating, lean rails, shelters, bike racks, signs, maps, digital real time arrival information, schedules, braille, bus identifier kits, communication books, waste receptacles, park and ride lots, and escalators and elevators.

Seating

Seating is distributed mainly in coordination with shelters (see following section).

Shelters & Canopies

Bus Shelters owned by PRT are erected in consideration of ridership, transfer points, topography, weather, older adults and people with disabilities, park and ride lots, and the balance of shelters between minority and non-minority areas. Shelter installation and movement is dependent on obtaining necessary municipal and property owner permissions. Additionally, PRT also owns and maintains shelters and canopies associated with light rail stations and stops throughout the service area. PRT also works with advertising agencies who have contracts with our municipal partners regarding placement of non-PRT owned bus shelters, though it does not have decision-making authority over advertising shelter vendors.

PRT maintains an accurate accounting of the location of all shelters, whether PRT or outside advertising vendor. Due to the limited ability to move shelters because of local jurisdictions, PRT does not standardize the availability of shelters by mode. Shelter locations are reviewed annually for both PRT shelters as well as the combined system-wide list, including all exterior shelters, to confirm no disparate impact exists between shelters in minority areas and those in non-minority areas. A variance of 20% or more PRT owned shelters in non-minority areas than minority areas as a percentage of overall stops will require additional efforts to locate shelters in minority areas once additional shelters become available. If a disparate impact exists with non-Authority owned shelters, PRT will advise external shelter companies.

Additional seating may be provided at light rail stations without shelters, but these are not yet mapped by PRT.

Signs, Maps and Digital Equipment

Signs and maps are located at fixed guideway stations throughout the system. PRT ensures that signs, maps and digital equipment are equitably disseminated throughout the service area. A variance of 20% or more signs, maps or digital equipment pieces per square mile of service area in non-minority areas than minority areas will require additional efforts to locate these assets in minority areas once they become available.

Schedules

Schedules for bus and rail services are actively stocked at 181 locations around Allegheny County. PRT will ensure that all actively stocked paper schedule locations are equitably distributed throughout the service area. A variance of 20% or more actively stocked schedule locations per square mile of service area in non-minority areas than minority areas will require additional efforts to locate these assets in minority areas once they become available.

Waste Receptacles

Waste receptacles are positioned at fixed guideway stops and stations (see section on shelters and canopies).

Park and Ride Lots

PRT's Park and rides are distributed across PRT's light rail system, busways, and at various suburban bus stops. PRT does not standardize the distribution of Park and Rides across modes due to limited availability of parking lots in Allegheny County. However, PRT ensures that parking spaces available to riders are equitably distributed between minority and non-minority areas within the County. A variance of 20% or more parking spaces per square mile of service area in non-minority areas than minority areas will require additional efforts to locate these assets in minority areas in the future. Additionally, before constructing or purchasing a new park and ride facility, PRT will analyze the impact this change will have on the overall offering of parking spaces between minority and non-minority areas.

Escalators/Elevators

PRT will ensure that escalators and elevators available to riders are equitably distributed throughout the service area wherever possible, though they are extremely limited in a system of PRT's size. A variance of 20% or more escalators/elevators per square mile of service area in non-minority areas than minority areas will require additional efforts to locate these assets in minority areas in the future. Additionally, before constructing a new escalator or elevator, PRT will analyze the impacts this change will have on the overall offering of these assets between minority and non-minority areas.

Vehicle Assignment Policy

The Service Planning and Evaluation Department assigns the type of transit vehicles triennially (with each schedule change) to routes based on ridership, route geographic and topographic features, operational maneuverability, route location and provisions of the Amalgamated Transit Union Local 85 contract. The assignment of vehicles will maximize route efficiency balanced with customer satisfaction while maintaining route vehicle assignment equity relative to race and income levels.

The Bus Maintenance Support Department balances the age of buses at the divisions. New buses are assigned to the four operating divisions evenly upon their arrival provided that hoists and bays can accommodate the vehicle type. The newest vehicles are assigned first for the daily assignment of buses to operators' runs and during peak hours, vehicles will be assigned to runs by major category and thereafter, randomly. Adjustments in coach assignments may occasionally be necessary due to vehicle breakdowns, inclement weather, or other conditions that may arise.

At the present time, PRT utilizes a combination of various sized vehicles. The composition of the fleet as of January 2025 is as follows:

Vehicle Type	Fleet Size	Used Mainly for
Bus 35' Diesel	30	Routes with narrow streets and/or sharp turns
Bus 40' Diesel	502	Default assignment – general use
Bus 40' Electric	8	Not assigned – treated as regular 40' buses
Bus 60' Articulated Diesel	81	High volume routes
Bus 60' BRT Diesel	44	
Bus 60' BRT Electric	14	
Light Rail Vehicle	81	Not assigned – 2 cars provided during high volume periods
Total	760	

Two-car light rail vehicles will be assigned to peak service for routes with off-board fare collectors based on ridership and the number of vehicles available for service. Complaints will be monitored, and checks conducted, and changes made when necessary.

Annually, the Data and Information Analytics Department samples vehicle assignments to ensure an equitable distribution of transit vehicles among routes. A variance of greater than 20% between minority and non-minority bus ages by route will require extensive review and actions will be taken to reduce the variance.

CHAPTER 3 DEMOGRAPHIC DATA AND MAPS

Census Based Customer Demographics and Travel Patterns

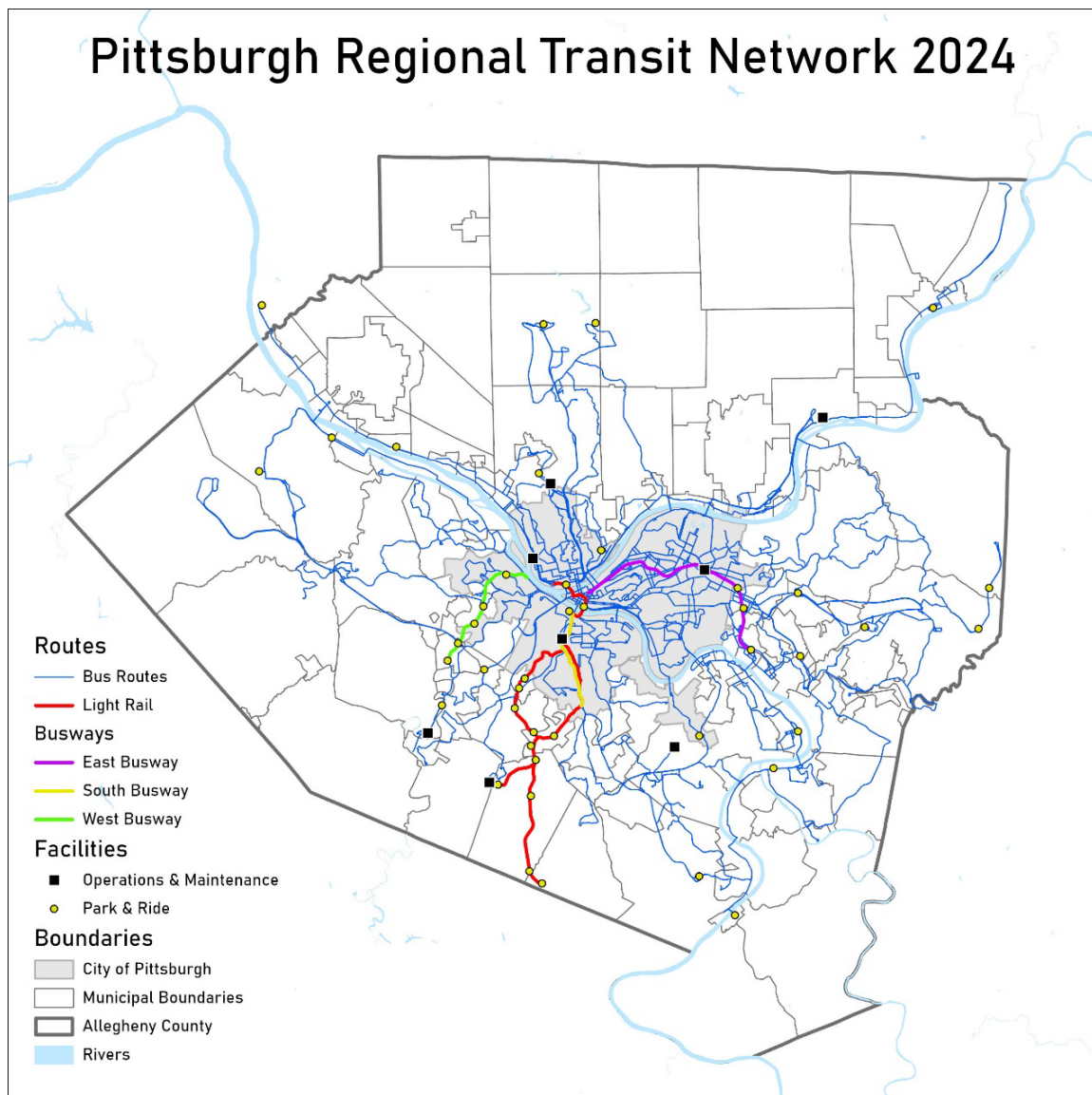
Demographic Analysis of PRT's Service Area

PRT Service Area

PRT's service area is the area within the watershed of PRT transit service.

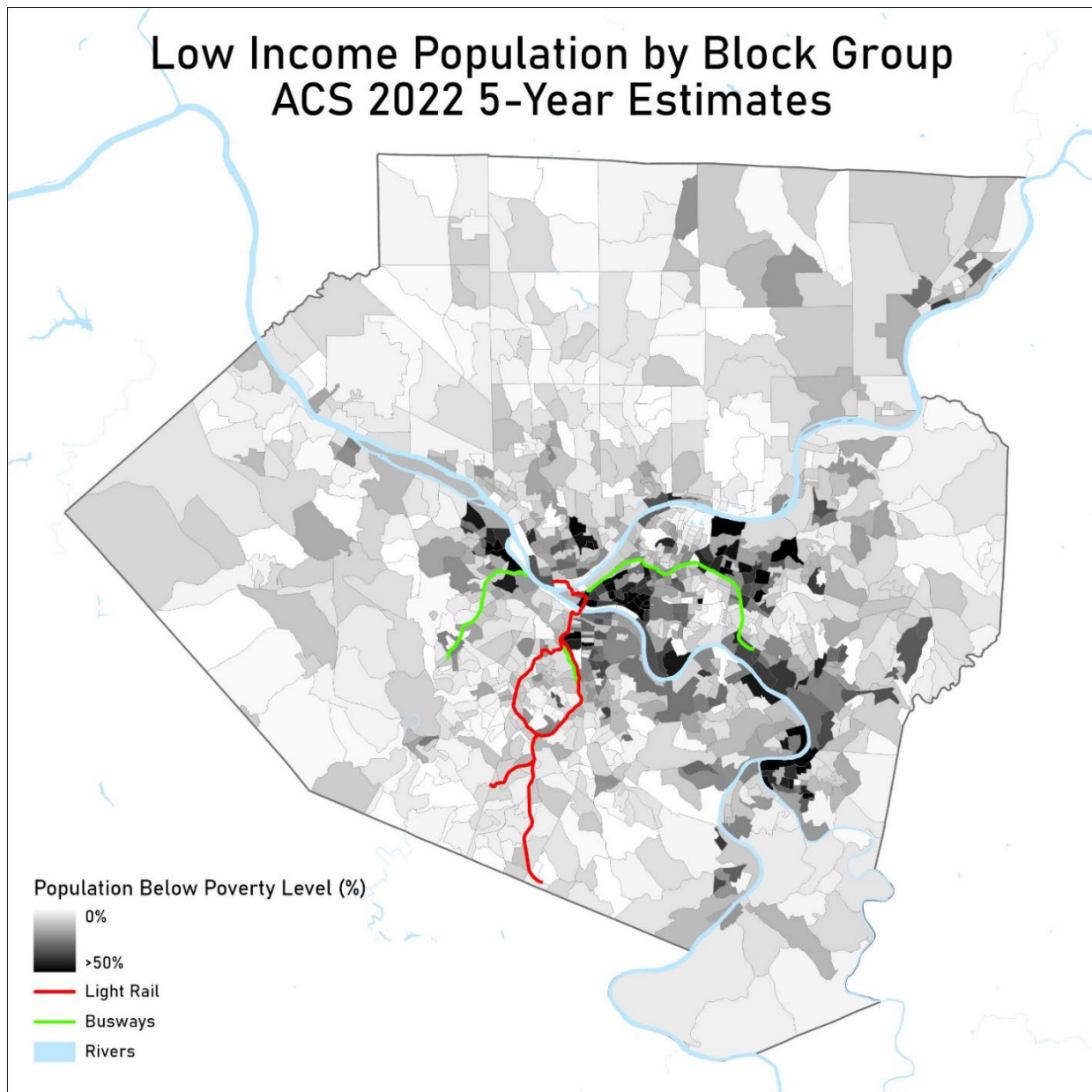
Transit Service Base Map

Below is a general map of PRT's service area, including bus routes, fixed guideway routes, Park and Rides, and agency facilities, such as garage and maintenance areas.



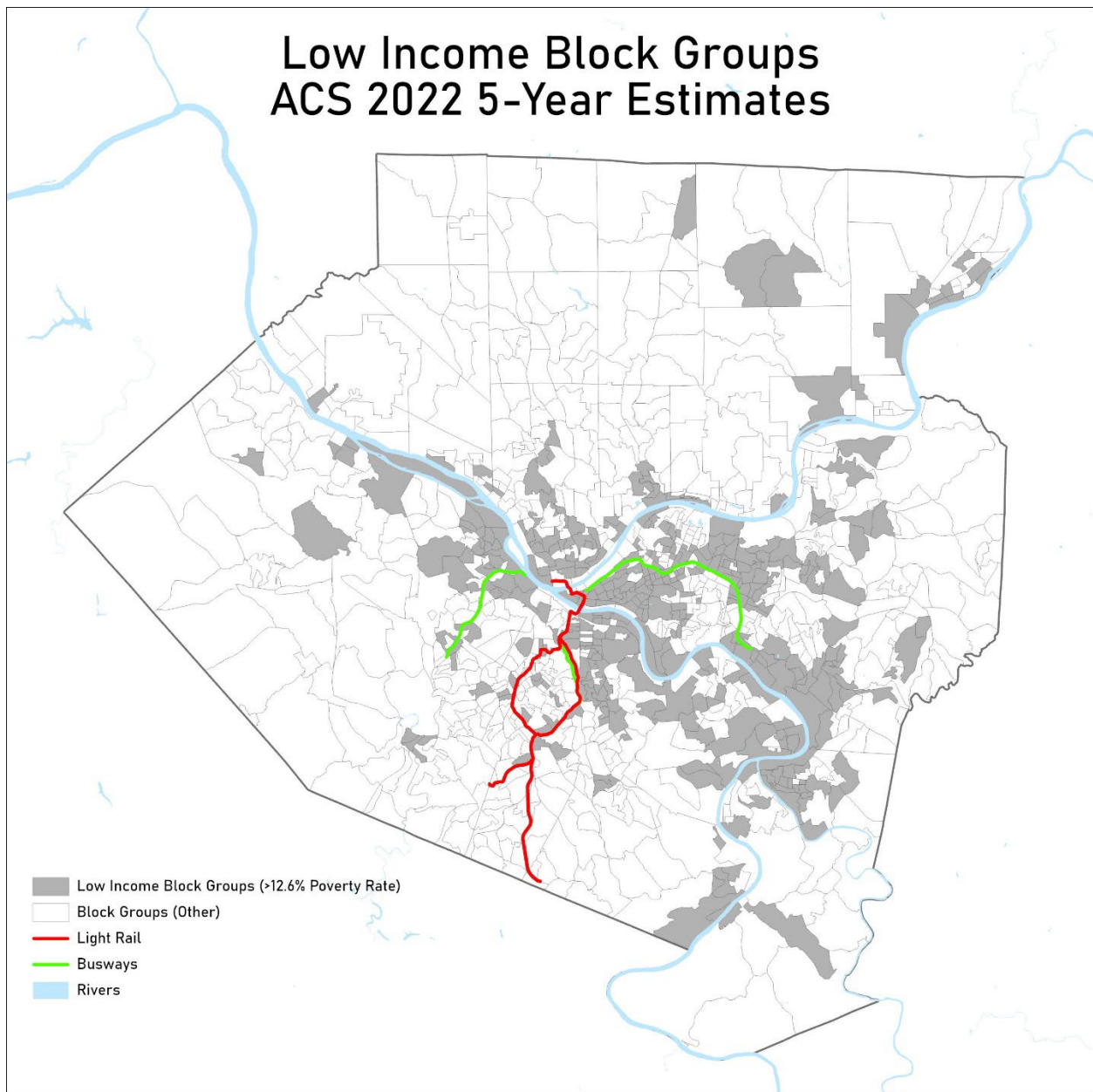
Low Income Population Map

The map below shows the percentage of the population within each census block group in Allegheny County with a household income lower than the Federal Poverty Level in the last 12 months using the 2022 ACS 5-year estimates.



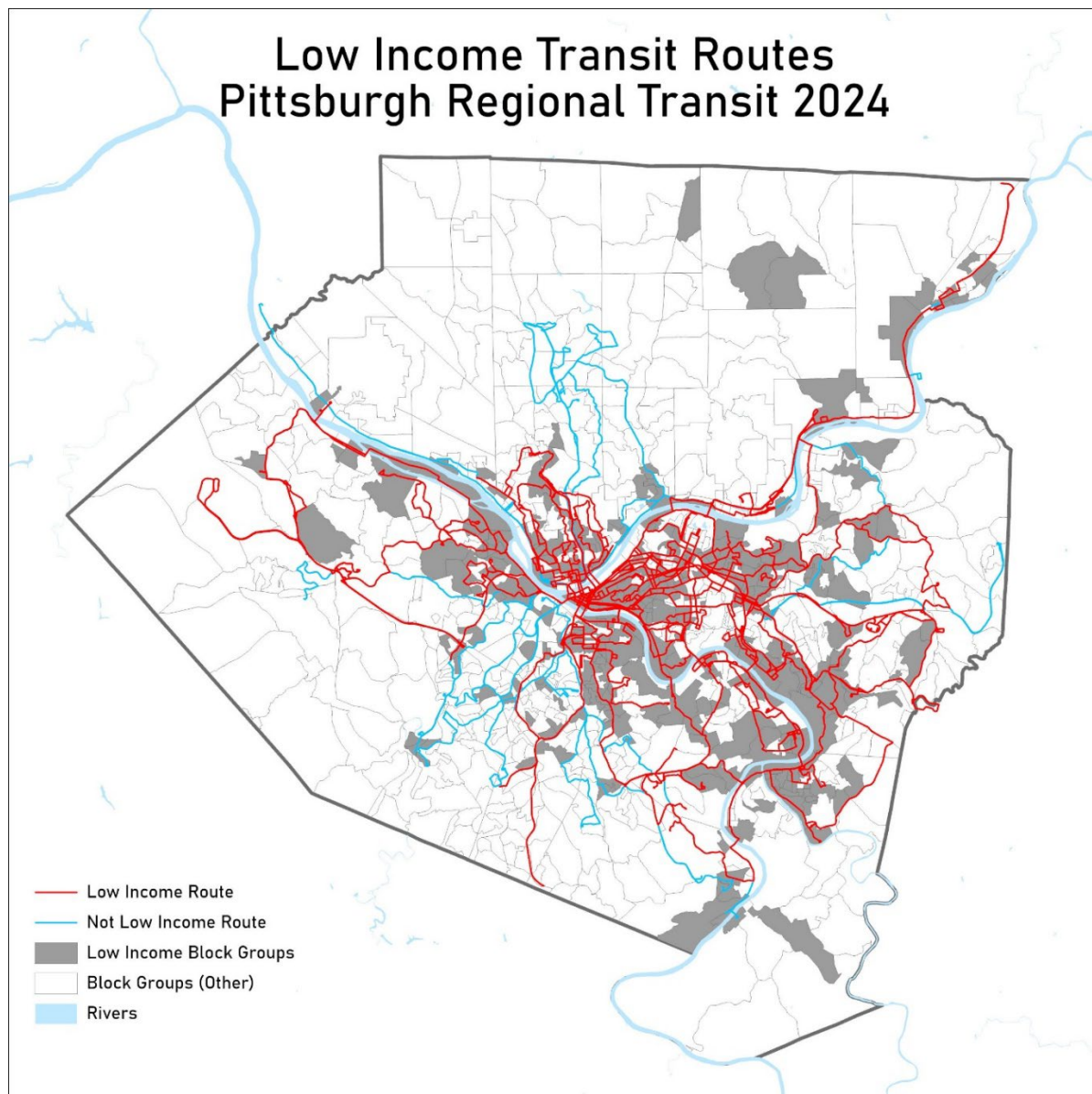
Low Income Block Group Map

This map identifies block groups where the percentage of population with a household income below the Federal Poverty Level is greater than 12.6%, the average for block groups in Allegheny County, according to the 2022 ACS 5-year estimates.



Low Income Transit Routes

The following map shows transit routes within the PRT system where at least one-third of the stops along the route are inside of a low-income block group. Many areas in Allegheny County might be served by limited access roads such as highways, long bridges, or bypass busways such as our South Busway. As a result, qualifying a route's character by how many miles of minority and non-minority areas it passes through can be misleading as buses may run for multiple miles through an area without serving said area. As an alternative and more accurate representation, PRT uses the percentage of stops within each area type to showcase the communities that are served by a route. As of November 2024, 78 out of 100 PRT routes are defined as low income. This is an increase of 13 routes, or 22%, from the previous program submission, despite a small decrease in poverty incidence countywide. PRT attributes this to a suburbanization of poverty into more outlying areas. A list of routes designated as low income follows the map below.

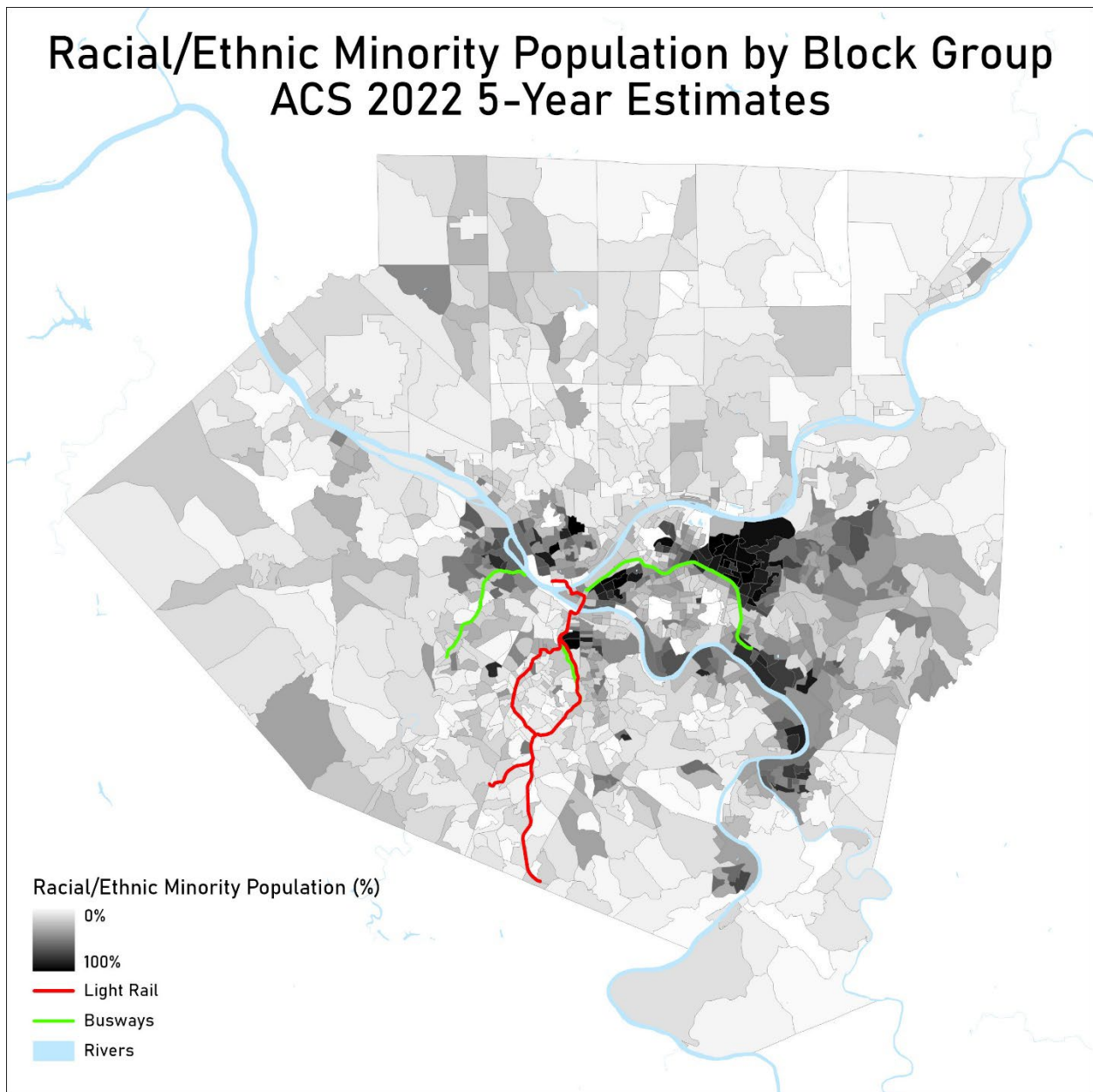


Low Income Designated Transit Routes

Low-Income Designated Transit Routes	1, 4, 6, 7, 8, 11, 13, 15, 16, 17, 18, 20, 21, 22, 24, 26, 27, 40, 43, 44, 48, 51, 53, 54, 55, 56, 57, 58, 59, 60, 64, 65, 67, 68, 69, 71, 74, 75, 77, 79, 81, 82, 83, 86, 87, 88, 89, 91, 93, 28X, 51L, 52L, 53L, 61A, 61B, 61C, 61D, 71A, 71B, 71C, 71D, BLUE, G2, G3, O1, P1, P10, P17, P3, P67, P68, P69, P7, P71, P76, P78, RED, SLVR, Y46
Non-Low Income Designated Transit Routes	2, 12, 14, 29, 31, 36, 38, 39, 41, 19L, DQI, G31, MI, O12, O5, P12, P13, P16, Y1, Y45, Y47, Y49

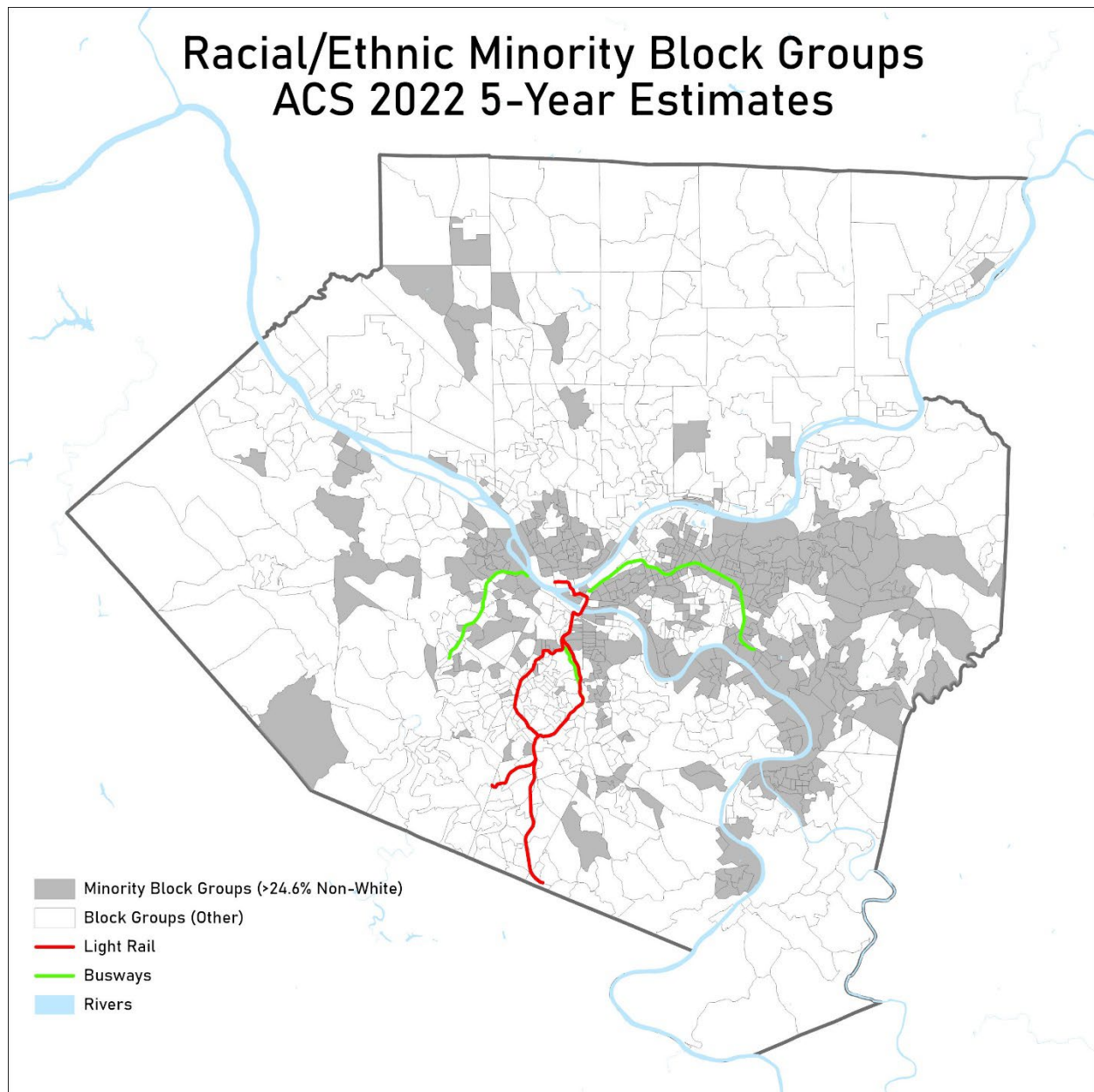
Minority Population Map

This map shows the percentage of the population within each block group in Allegheny County identifying as a racial or ethnic minority (Hispanic, Latino, and/or non-White) according to the 2022 ACS 5-year estimates.



Minority Block Group Map

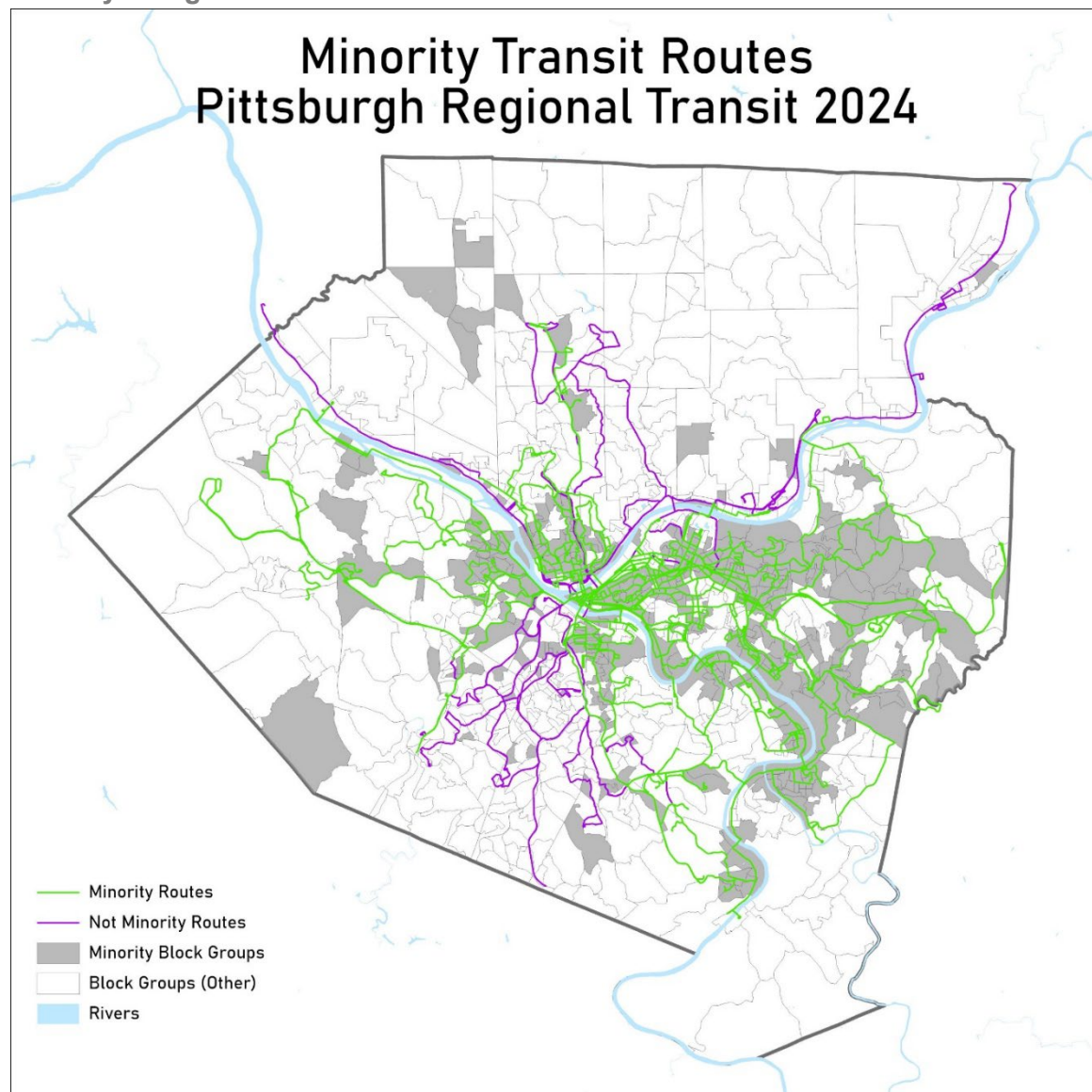
This map identifies block groups where the percentage of population identifying as a racial or ethnic minority (Hispanic, Latino, and/or non-White) is greater than 24.6%, the average for block groups in Allegheny County, according to the 2022 ACS 5-year estimates.



Minority Transit Routes

The following map shows minority transit routes within the PRT system. minority transit routes are defined by PRT as routes where at least one-third of the stops are in a block group where the percentage minority population exceeds the percentage minority population in the service area. For the most recent Census data, this is the American Community Survey 5-year estimates from 2022. As of this data, minorities comprise 24.6% of the total population. PRT chose to use the location of stops, rather than revenue miles of the route, to measure minority route status. Since some routes traverse through an area without stopping to serve, a stop location was determined to be the most accurate measure of the populations served by a route. As of November 2024, 75 out of 100 PRT routes are designated minority routes. This is an increase of 18 routes, or 34%, from the previous program submission. Like income, PRT attributes this change to a greater dispersal of racial diversity across the service area, rather than a substantial increase in the total share of minority persons. A full list of minority transit routes follows the map.

Minority Designated Transit Routes



Minority Designated Transit Routes	4, 6, 7, 8, 11, 12, 13, 15, 16, 17, 18, 20, 21, 22, 24 26, 27, 29, 31, 43, 44, 48, 51, 53, 54, 55, 56, 57, 58, 59, 60, 64, 65, 67, 68, 69, 71, 74, 75, 77, 79, 81, 82, 83, 86, 88, 89, 93, 28X, 52L, 61A, 61B, 61C, 61D, 71A, 71B, 71C, 71D, G2, G3, P1, P12, P16, P17, P3, P67, P68, P69, P7, P71, P76, P78, Y1, Y46
Non-Minority Designated Transit Routes	1, 2, 14, 36, 38, 39, 40, 41, 87, 91, 19L, 51L, 53L, BLUE, DQI, G31, MI, O1, O12, O5, P10, P13, RED, SLVR, Y45, Y47, Y49

Routes falling into both route classifications include:

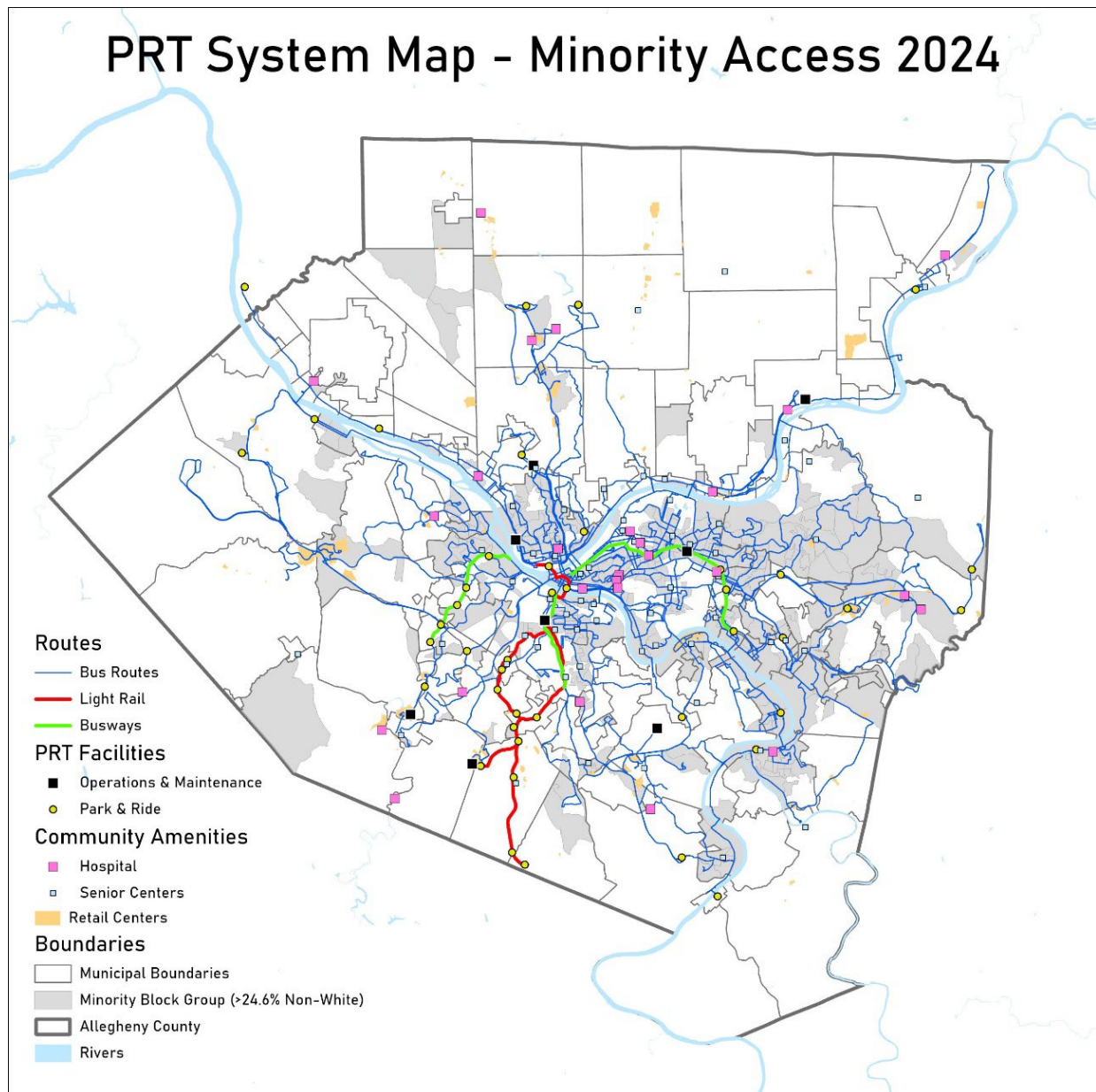
Minority and Low-Income Designated Transit Routes (68 out of 100 routes)	4, 6, 7, 8, 11, 13, 15, 16, 17, 18, 20, 21, 22, 24, 26, 27, 43, 44, 48, 51, 53, 54, 55, 56, 57, 58, 59, 60, 64, 65, 67, 68, 69, 71, 74, 75, 77, 79, 81, 82, 83, 86, 88, 89, 93, 28X, 52L, 61A, 61B, 61C, 61D, 71A, 71B, 71C, 71D, G2, G3, P1, P17, P3, P67, P68, P69, P7, P71, P76, P78, Y46
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Routes falling into neither route classification include:

Non-Minority and Non-Low Income Designated Transit Routes (16 out of 100 routes)	2, 14, 36, 38, 39, 41, 19L, DQI, G31, MI, O12, O5, P13, Y45, Y47, Y49
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Minority System Map

The map below overlays all essential PRT assets alongside minority block groups, along with important destinations such as hospitals, senior centers, and shopping centers.



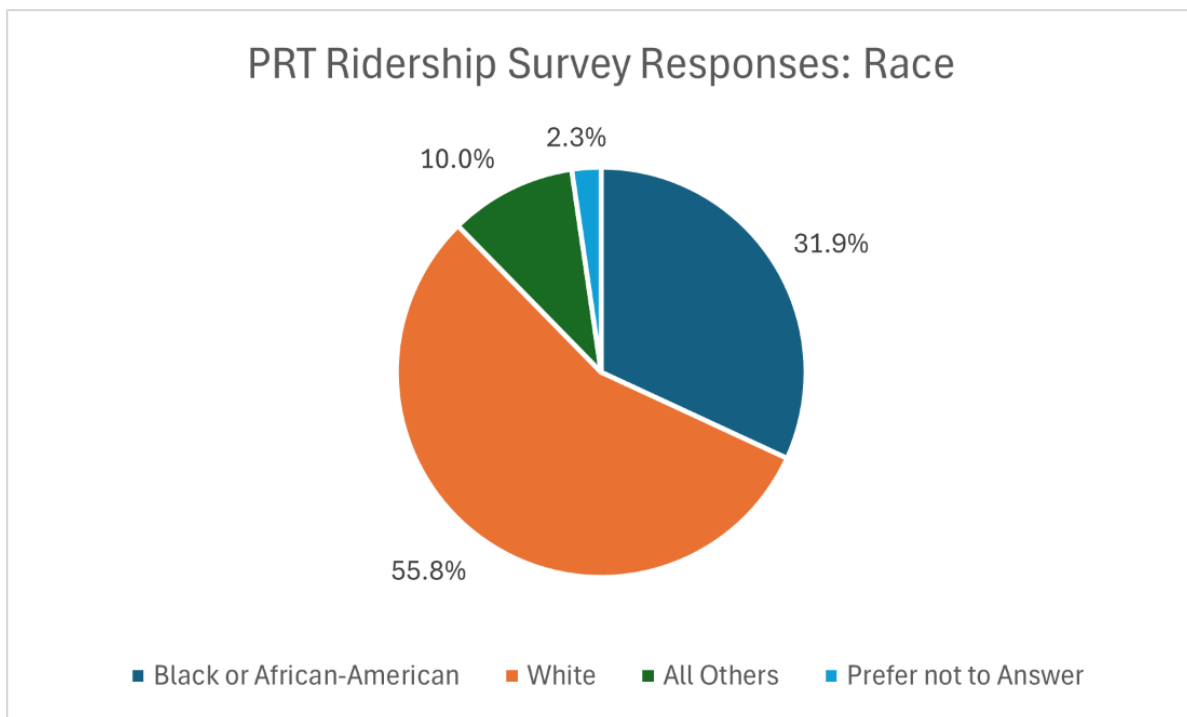
Survey Based Customer Demographics and Travel Patterns

A customer survey was conducted in October 2023 by the consulting firm Campos, Inc. The survey captured 1,000 responses from riders 18 years and older, approximately half of which were surveyed by live interceptors on-board vehicles and at stops. The remaining responses were collected online from a subset of registered ConnectCard users. There is a +/- 3% margin of error in survey responses at the 95% confidence level.

Survey Demographics

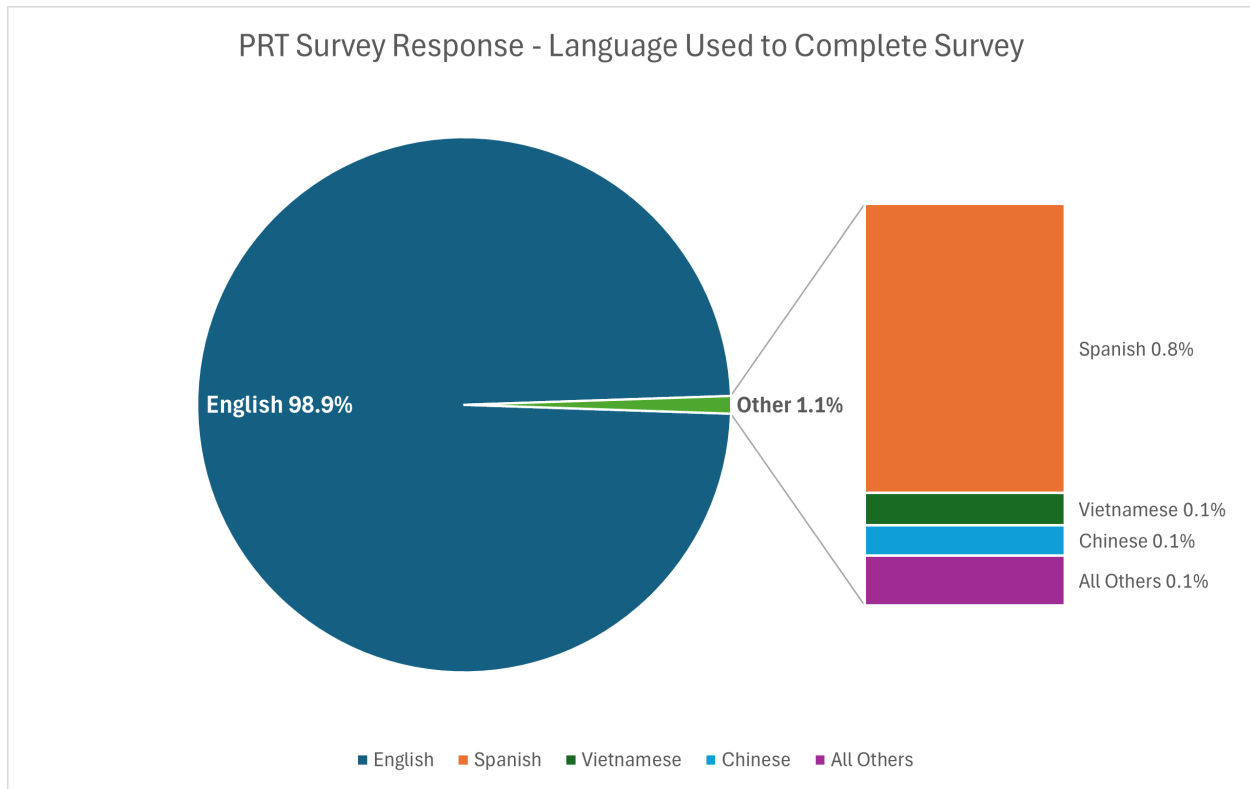
Race, Color & National Origin

Respondents were asked their race/ethnicity. 55.8% responded as White, 31.9% as Black, 10.0% identified as another race, and 2.3% of respondents did not respond to the question on race and ethnicity. The change in methodology likely explains the increase in Black respondents from the previous survey—while just 14% of online respondents were Black, they accounted for the majority of those surveyed on vehicles and at stops. The previous survey conducted in 2019 only included online and telephone responses. The updated findings suggest that PRT's ridership disproportionately includes Non-White residents of Allegheny County.



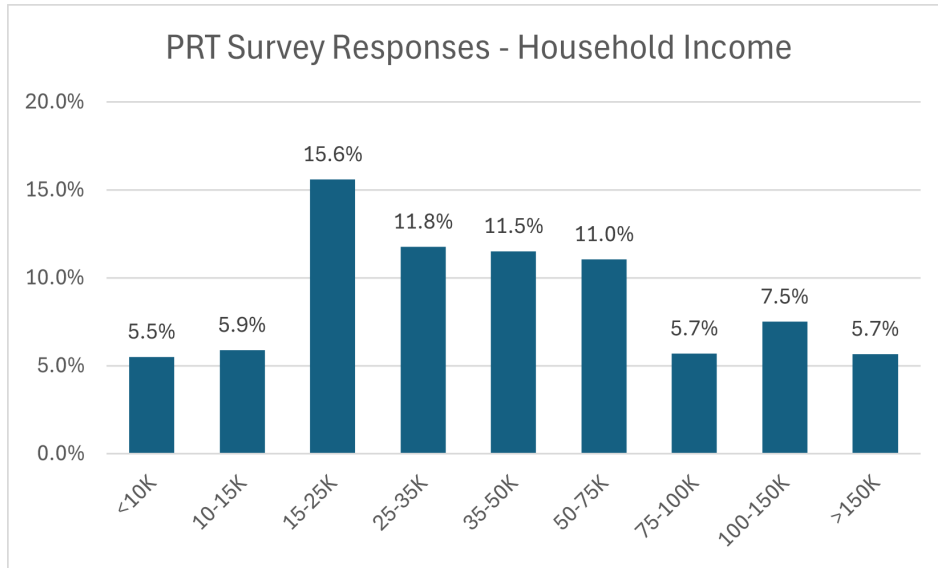
English Proficiency & Language Spoken at Home

PRT conducted a Fare survey in 2022 that included the option to complete it in multiple languages. 98.9% of responses were recorded in English, 0.8% in Spanish, 0.1% in Vietnamese, 0.1% Chinese, and 0.1% Others (including French, Arabic, Nepali, Portuguese, and Italian).

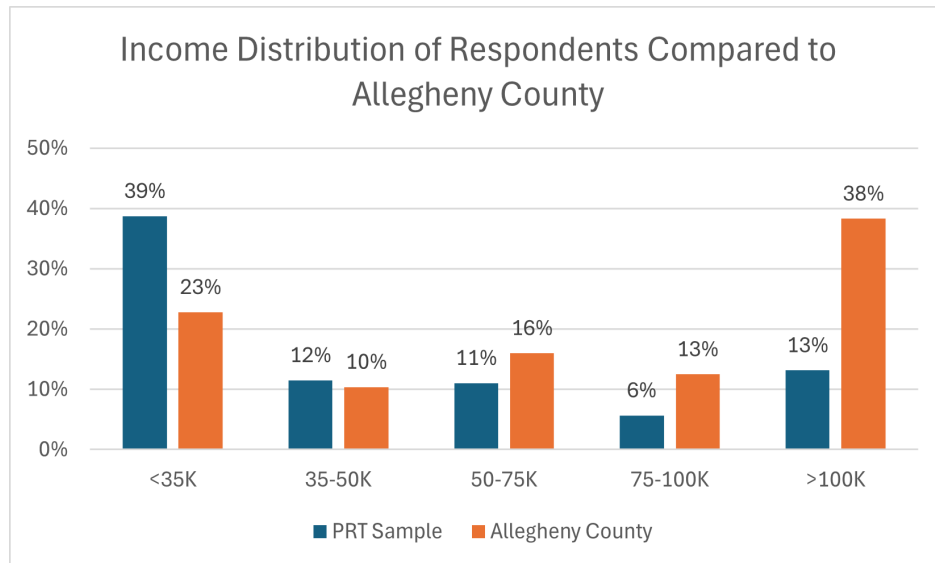


Household Income

Respondents were asked their household income. 801 (80.1%) people answered this question. The distribution of answers was skewed towards lower income individuals, with nearly 40% of respondents saying their annual household income was less than \$35,000.



When developing a ridership profile of our riders for income, the income brackets skew lower than the county average. Households with an annual income below \$35,000 are overrepresented in the survey, while households making \$100,000 or more annually are underrepresented.



Travel Patterns

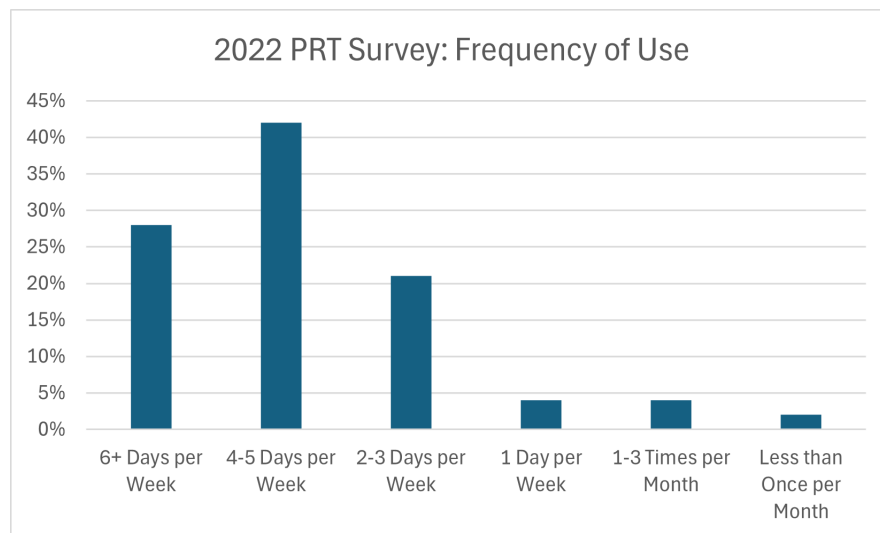
Modal Usage

Using results from the 2022 Fare survey conducted by PRT with Campos, Inc., 87% reported using the Bus as their primary mode within the system, with 13% indicating that they primarily use Light Rail. None of the respondents in this survey used the Incline as their primary mode within the system. These results are generally consistent with ridership figures for FY24 by mode (90.0% Bus, 9.2% Light Rail, 0.7% Incline).

Bus	87%
Light Rail	13%
Incline	0%

Frequency of Use

Most riders (70%) surveyed take transit at least four days per week. 10% of riders surveyed ride once per week or less, indicating that they are occasional or special event users only, rather than commuters or regular users.



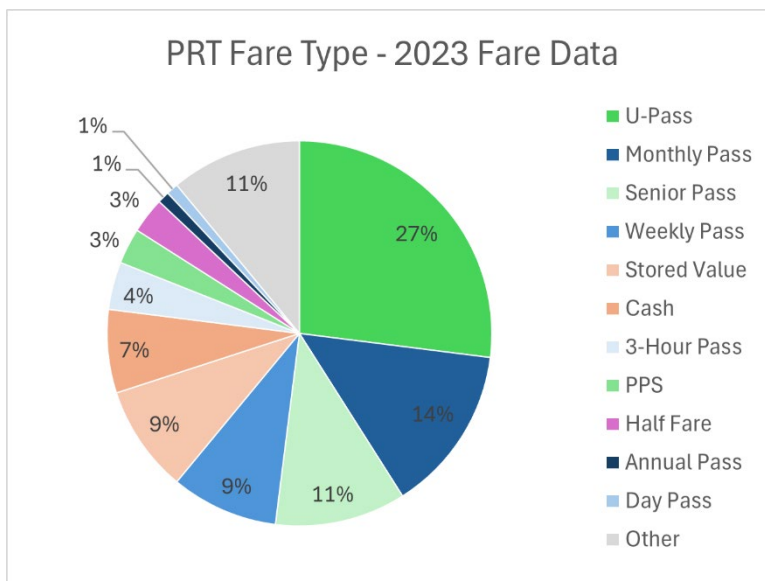
Transfers

Riders were asked how many transfers were needed to complete their one-way trip. 60% of riders reported one or more transfers, with the remaining 41% not requiring a transfer. This survey was conducted with live responses on transit vehicles, so there may be an overrepresentation of riders with long total trip times.

No Transfer Needed	41%
One Transfer	32%
Two Transfers	20%
Three or More Transfers	8%

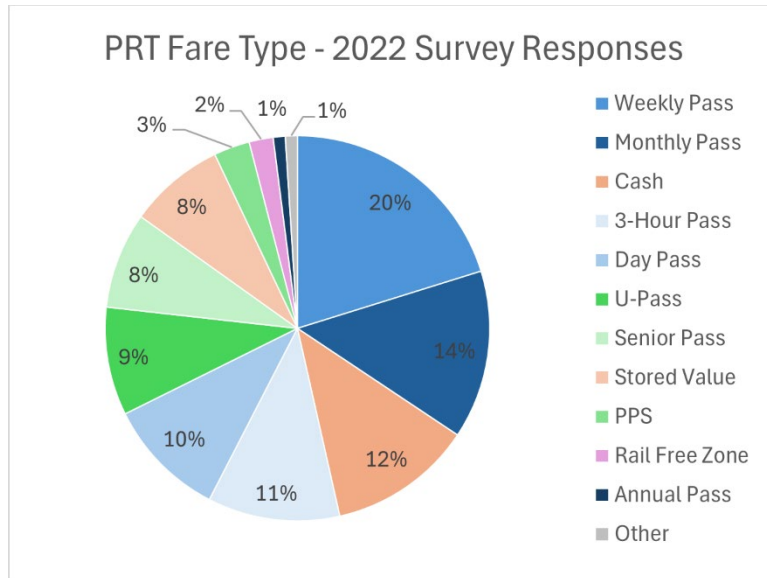
Fare Usage and Types

PRT allows its riders to pay for their ride in many ways. ConnectCard, PRT's reusable payment card, can be loaded with any value (Stored Cash Value) or with a time-based unlimited pass (Weekly, Monthly or Annual). PRT also sells tickets and books of tickets good for a trip(s) and accepts Senior Citizen and Student passes for reduced fares. Persons with disabilities also ride with a ConnectCard with reduced fares. Cash is also allowed on board vehicles as a payment method. Fare types recorded in CY2023 are reported in the chart below:



Based on recorded fare types, U-Pass accounted for more than one-quarter of total system use, highlighting the high transit propensity among university students, faculty, and staff in our service area. Other fare types with high utilization include: Monthly Pass (14%), Senior Pass (11%), Weekly Pass (9%), and Stored Value (9%). Cash fares account for 7% of ridership, and half fare passes accounted for 3% of ridership.

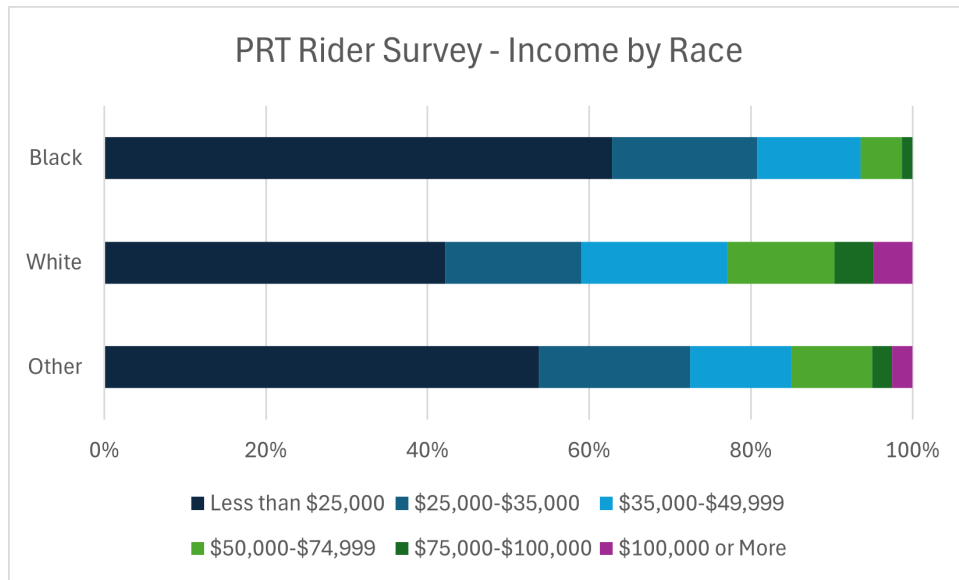
In addition to recorded fare data from CY2023, PRT also has survey responses from 2022 (see below). The primary difference between the 2022 survey data and recorded fare data from the following year is that the survey underrepresented U-Pass and Senior Pass ridership. The higher values for Stored Value and time-based fares are more representative of peak commute travel patterns, whereas riders using U-Pass and Senior Pass fares are more likely to ride during off-peak hours outside of the Central Business District. Additionally, ridership with the downtown rail fare-free zone is not captured in our fare data, as there is no payment upon boarding for stations within the fare-free zone.



Among surveyed riders, Weekly Pass was the leading fare type (20%). Other popular fare types among survey respondents were: Monthly Pass (14%), 3-Hour Pass (11%), Day Pass (10%), U-Pass (9%), Senior Pass (9%), and Stored Value (8%). 12% of survey respondents reported using cash fares.

Household Income by Minority Status

Respondents who identified as White / Caucasian, on average, reported higher incomes than respondents from other racial groups. Respondents who did not record a response for income (23% of Black respondents, 17% of White respondents, and 20% of other respondents) are excluded from this chart. As can be seen in the chart below, 64% of Black respondents to this question reported income of under \$25,000, compared to 42% of White respondents.

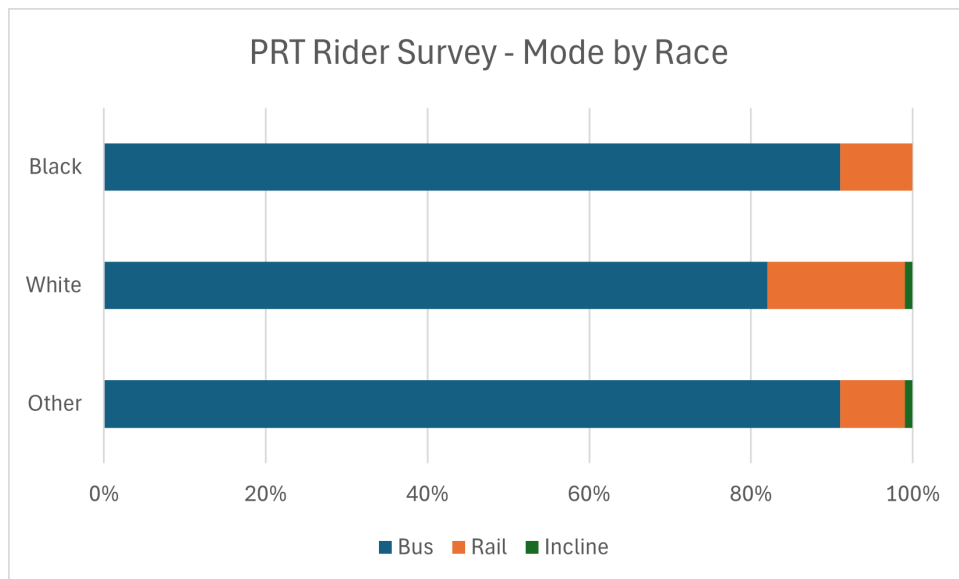


Travel Patterns by Minority Status and Income Levels

Modal Usage

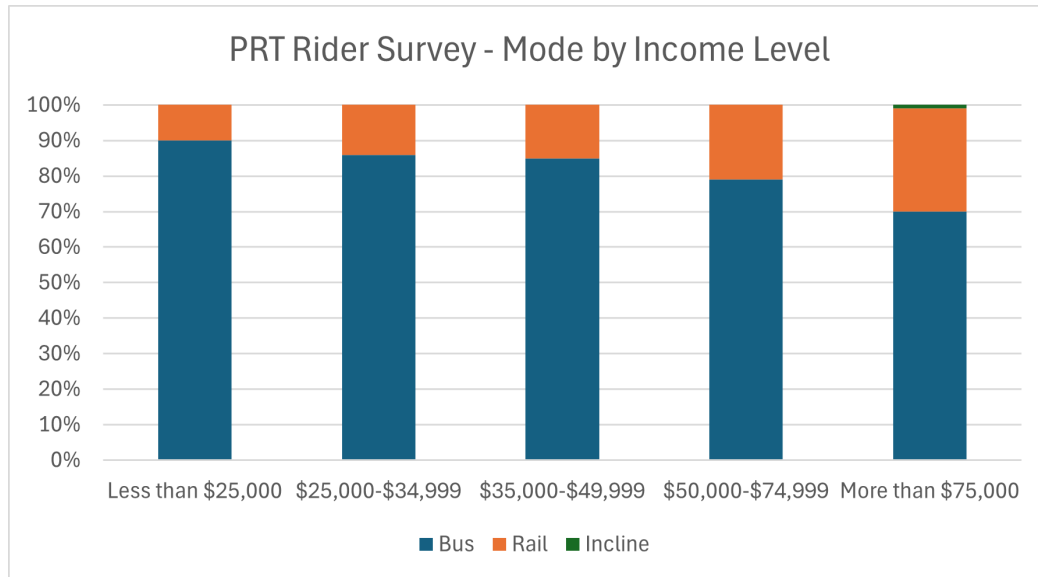
Modal Usage by Minority Status

The graph and chart below show the breakdown of transit modes by race. The survey found that White respondents are more likely to use Light Rail than respondents from other races. Buses remain the predominant mode across all racial groups.



Modal Usage by Income

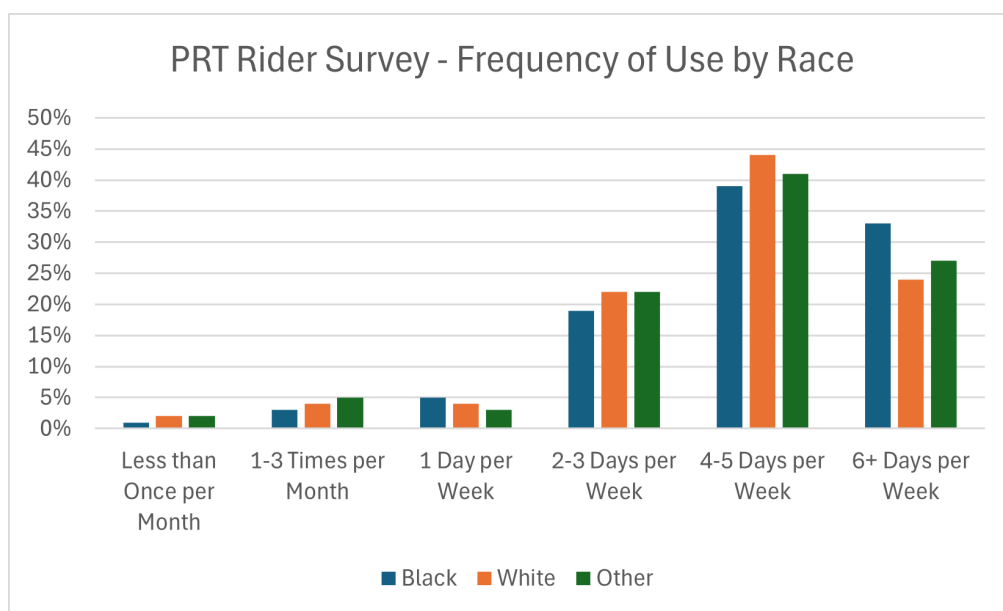
Modal use reflects differences between the highest and lowest income brackets. While Bus usage reflects the majority of system use across all income brackets, Light Rail usage increases consistently at higher income levels. Incline use also increases with income, but overall usage is 1% or less across all income brackets.



Frequency of Use

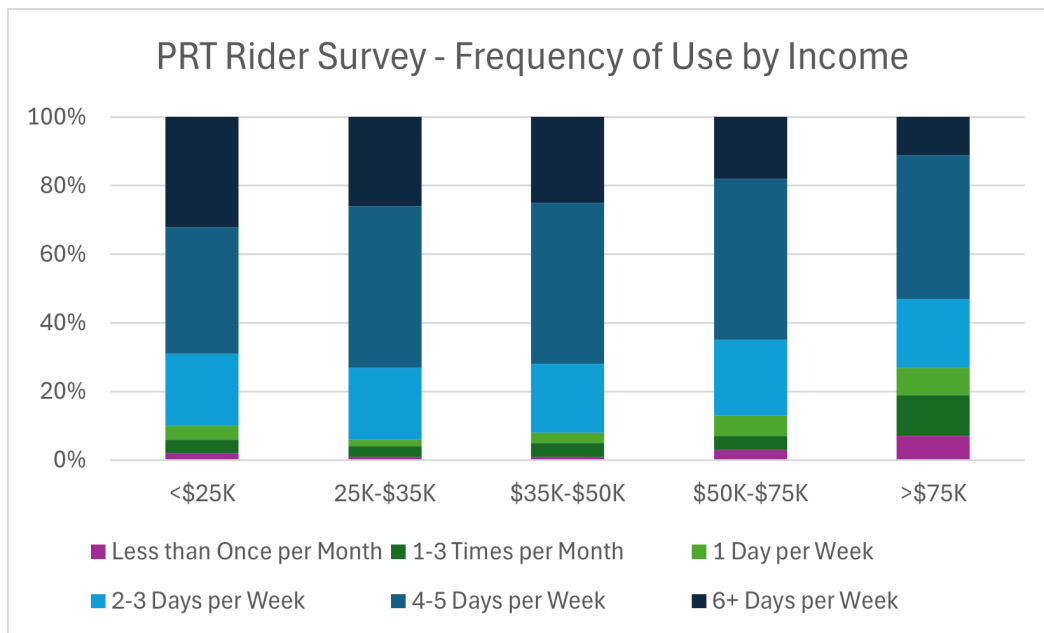
Frequency of Use by Minority Status

PRT's ridership survey found that a plurality of riders across all racial groups use PRT services 4-5 times per week, approximating a weekday commute pattern. Black riders were slightly more likely (33%) to respond '6 or more times per week,' indicating a greater propensity for weekend and non-work trips. Since the survey was comprised mostly of in-person responses, few respondents indicated use of once per week or less frequently.



Frequency of Use by Income Levels

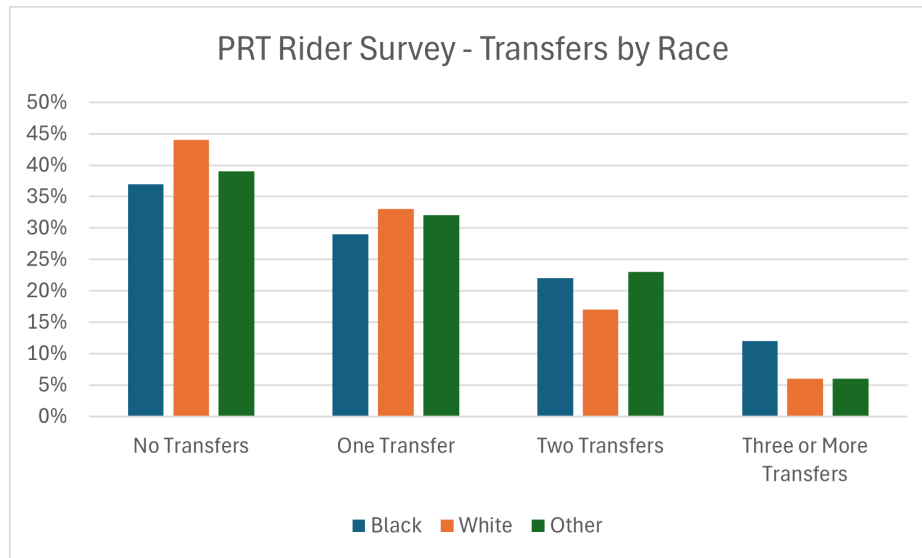
PRT's ridership survey found that income was a stronger predictor for frequency of transit use than race, with a clear decline in frequency of use as income levels increase. Among respondents earning \$25,000 or less, nearly one-third (32%) use PRT services 6 or more days per week, compared to 11% among respondents earning \$75,000 or more. This indicates greater reliance on public transit for non-work trips. Occasional or infrequent use, 1 trip per week or less, was similarly much higher among the highest earning respondents, accounting for 27% of respondents earning \$75,000 but only 10% of respondents earning \$25,000 or less. Despite the clear relationship between income and frequency of use, the plurality of riders across all income levels use PRT services 4-5 times per week, approximating a weekday commuter pattern. As with the other findings in this survey, responses are likely skewed toward more frequent riders, as they would be more likely to be included among responses collected in-person while accessing the PRT system.



Transfers

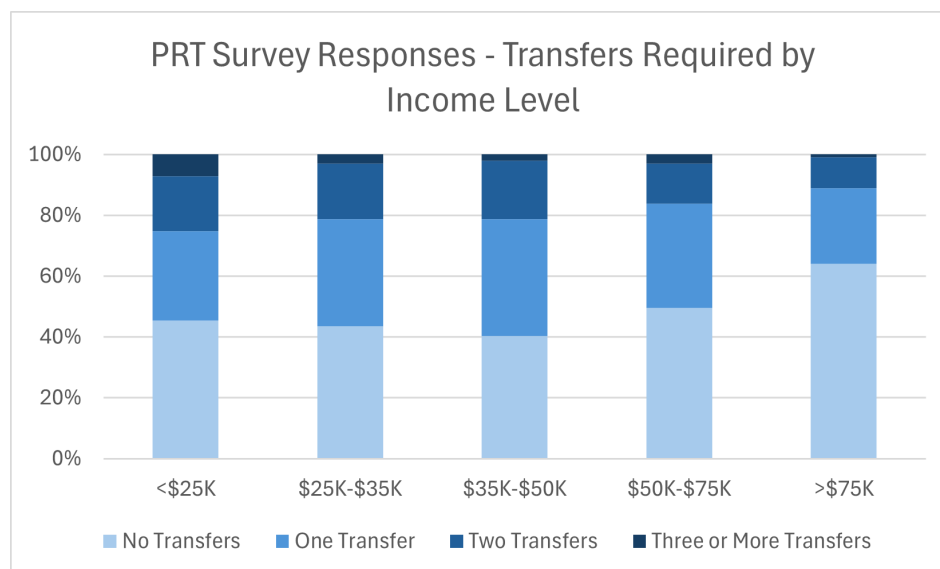
Transfers by Minority Status

Overall, 60% of riders stated that they required a transfer to a second transit vehicle to complete their primary trip. This finding is higher than in previous surveys and likely reflects the change in methodology to in-person survey collection, increasing likelihood of encountering a survey enumerator for riders spending the most time in transit. This consideration notwithstanding, minority riders are more likely to require a transfer than non-minority riders as a percentage; 56% of White respondents require at least one transfer, compared to 63% of Black respondents and 61% of other respondents. The racial disparity increases with the number of transfers, and notably Black respondents were twice as likely (12%) to require three or more transfers compared to respondents from other races.



Transfers by Income Level

Riders at lower income levels are more likely to require a transfer. 55% of riders earning less than \$25,000 per year require one or more transfers, compared to just 36% of those earning \$75,000 or more. The difference is even greater for riders requiring three or more transfers. 7% of riders earning less than \$25,000 per year require three or more transfers, compared to just 1% of those earning \$75,000 or more.

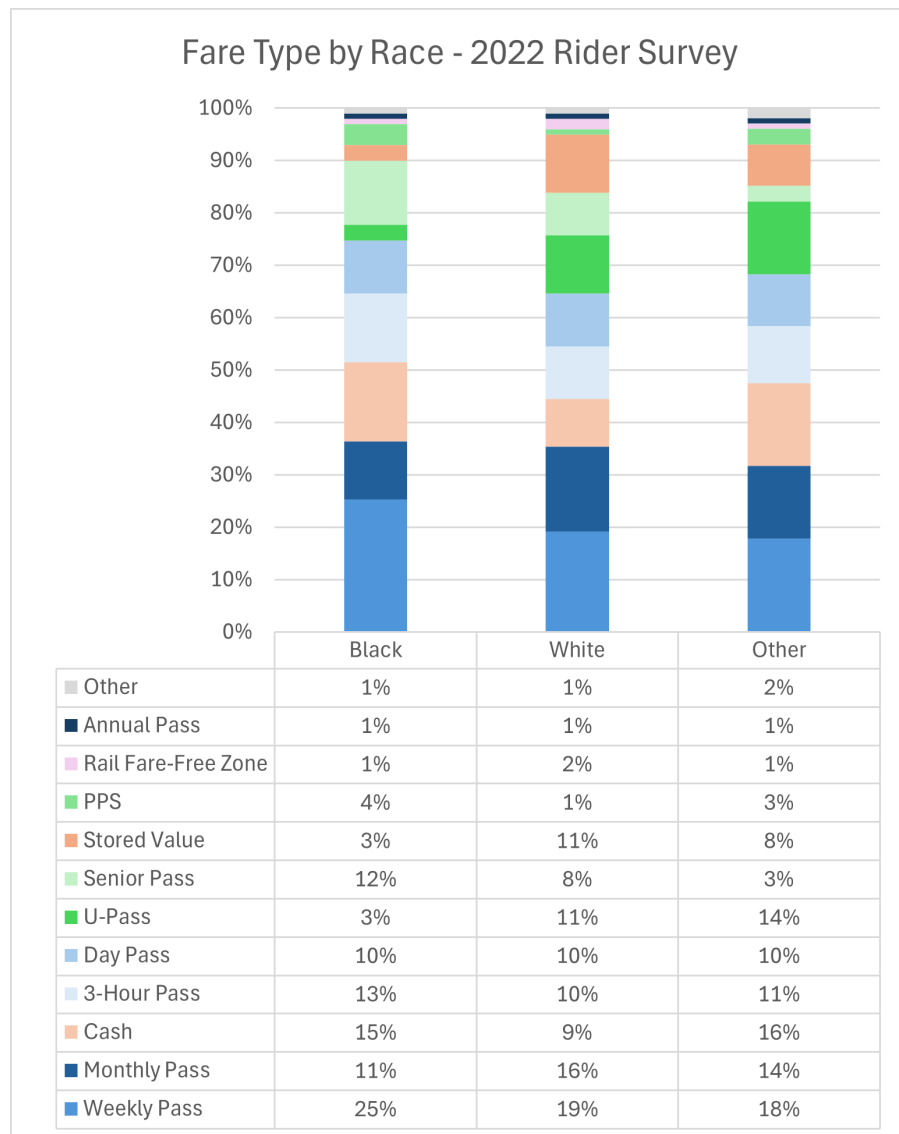


Fare Usage

Fare Usage by Race

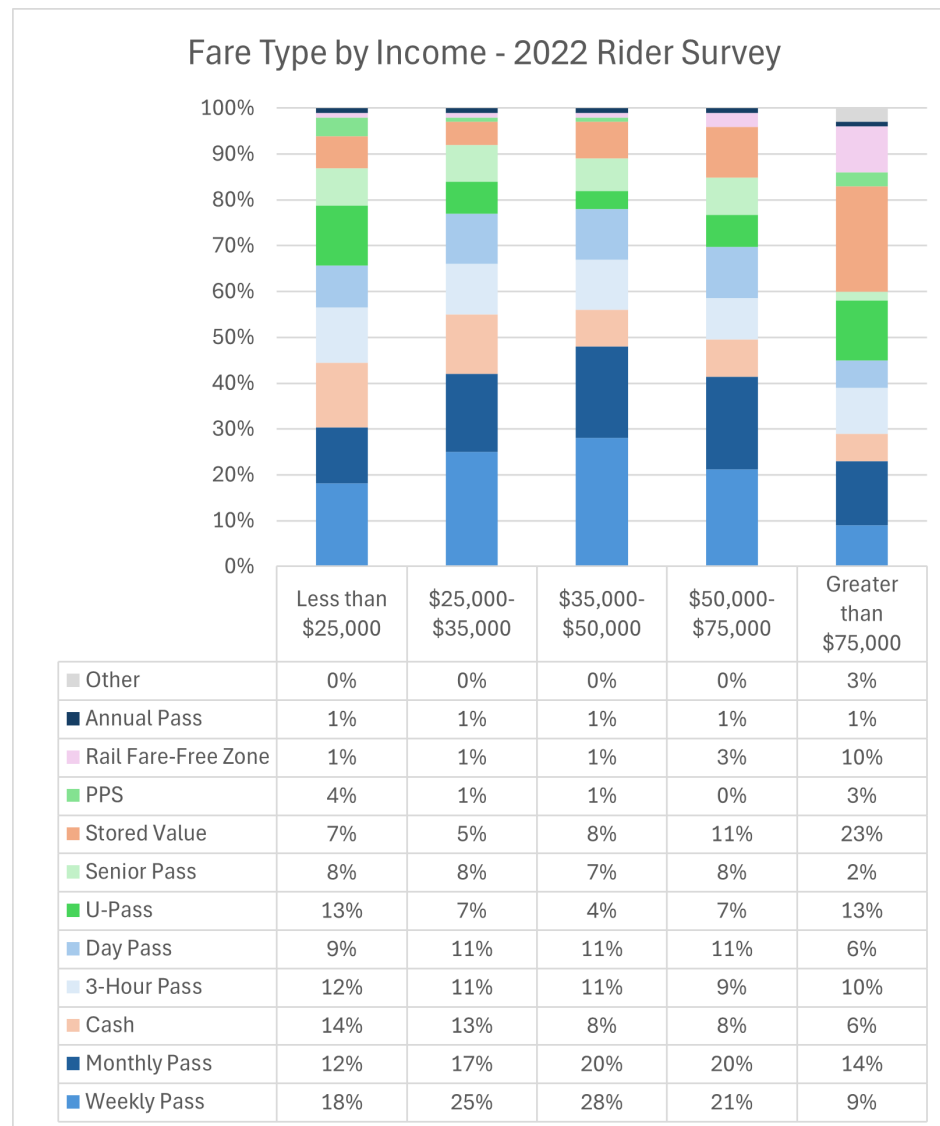
Non-minorities are significantly more likely to use Stored Cash Value, and less likely to use Weekly and Monthly passes. Additionally, minorities are about twice as likely to use Cash as non-minorities, though the sample size is small. Other pass types are roughly aligned between the two groups.

Data on Fare Type is only disaggregated by race in the survey responses. From the 2022 survey, Non-White (Black and Other) riders were more likely to use cash and PPS (public school) fares. Black riders reported the highest rates of Senior Pass (12%) and Weekly Pass (25%) utilization, and comparatively low rates of U-Pass (3%) and Stored Value (3%). Asian and Hispanic riders ('Other') had the highest rates of U-Pass utilization (14%).



Fare Usage by Income Levels

Based on responses to PRT's 2022 ridership fare survey, there are a few trends that emerge. The most critical of these is the correlation between lower income riders and cash fares. As previously stated, riders using cash fares cannot take advantage of PRT's free transfer policy, representing a disproportionate impact on lower-income riders who rely on cash fares. PRT is addressing this through our partnership with Vanilla Direct, along with rider outreach to communicate the comparative benefit of using a ConnectCard or time-based pass. At the other end of the income spectrum, Stored Value trends upward with increased incomes, as does utilization of PRT's fare-free rail zone. The latter finding is consistent with findings on the relationship between income and mode usage, highlighted earlier in this section. U-Pass shows a bimodal distribution, with highest utilization at the lowest and highest income brackets. This finding can be explained through the availability of U-Pass both to university-affiliated students and faculty, which are more likely to be represented at the bottom/top of the income distribution, respectively.



CHAPTER 4 SERVICE MONITORING

Monitoring

The metrics to measure disparate impact and equity of transit amenity distribution are defined in Chapter 2 of the Title VI Program. The most recent ACS data was used throughout the program document and various analyses as available at the time they were completed. Where Census data are used, the specific dataset used is noted.

Service Standards from Chapter 2 are all evaluated annually and reported to the Board in the form of an Annual Service Report. The Title VI pages of the Annual Service Reports for FY2022, FY2023, and FY2024 are attached as Appendices E, G, and I, respectively. Meeting minutes from presentations to Committee/Board members of the Annual Service Reports are also attached for reference as Appendices F, H, and J, respectively. In addition to this annual report, a summary of Service Standards and Policies for all three years is below.

Performance of Minority and Non-minority Routes

Disparate Impact Policy

FTA Circular 4702.1B defines disparate impact as 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 lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives, but with less disproportionate effects on the basis of race, color, or national origin.

The Disparate Impact Threshold is defined for this section as the impact of any Service Standard or Policy that results in a minority population bearing adverse effects which are 20 percent more than the adverse effects borne by the non-minority population. Disparate impacts of less than 20 percent are determined to be insignificant in nature and will not bear further review or monitoring.

Summary of Analyses

The service standards and policies are analyzed in this chapter to determine if a significant (>20%) disparate impact exists between minority and non-minority areas/routes throughout the transit system. **PRT found one adverse impact; crowding was greater on minority routes at a significant rate as defined in PRT's service standards.** A summary of the results follows:

MINORITY TITLE VI SERVICE ANALYSES	Minority Areas/ Routes	Non- minority Areas/ Routes	Difference	Disparity Exists	Level of Disparity	Significant to Disparate Impact Threshold of >20%?
Service Standards						
Vehicle Load (percent full)	40.1%	37.5%	-2.6%	Yes	6.5%	No
Vehicle Headways - Weekday Peak	33.8	34.1	-0.3	No	-1.0%	No
Vehicle Headways - Weekday Off-Peak	38.4	37.5	0.8	Yes	2.2%	No
Vehicle Headways - Saturday	47.8	54.4	-6.7	No	-12.2%	No
Vehicle Headways - Sunday	53.4	58.9	-5.5	No	-9.3%	No
On Time Performance	68.7%	70.7%	-2.0%	Yes	2.8%	No
Out-of-Service	2.0%	2.0%	-0.0%	No	NA	NA
Crowding	1.1%	0.2%	0.9%	Yes	433%	Yes
Span of Service - Weekday	18.0	16.9	1.1	No	NA	NA
Span of Service - Saturday	15.6	13.2	2.3	No	NA	NA
Span of Service - Sunday	14.1	11.3	2.8	No	NA	NA
Service Availability (Census Block Groups)	76.2%	47.3%	28.9%	No	NA	No
Service Policies						
Transit Stops with Shelter per square mile	0.98	0.31	0.67	No	NA	No
Fare Purchase Locations per square mile	0.32	0.12	0.20	No	NA	No
Signs and Maps Locations per square mile	.13	.05	.08	No	NA	No
Schedule Locations per square mile	0.59	0.16	0.43	No	NA	No
Park and Ride Spaces per square mile	20.42	17.41	3.01	No	NA	No
Vehicle Age (years)	6.23	5.98	0.25	Yes	4.17%	No

Vehicle Load (bus only)

For this section, trips between 2022 and 2024 were analyzed to determine maximum passenger load versus capacity. “Capacity” was defined as seated load.

On routes designated as minority routes, the average peak maximum load was 40.1%. On routes not designated as minority routes, the average peak maximum load was 37.5%. The difference between average peak maximum load on minority routes and non-minority routes was 2.6%. **There were insignificant adverse impacts** found for minority routes of 6.5% greater vehicle loads. PRT will keep an eye on this service standard as it adjusts schedules in FY2026 to avoid future significant adverse impacts.

Note on Light Rail Loads

Light rail vehicles do not have passenger counters, and as such, no load information is available for this period. All three light rail routes are considered non-minority routes. Automatic Passenger Counters were approved to be used by PRT beginning in January 2025, so this will be available for the next program submission.

Vehicle Headway

Trips per hour are covered in the Annual Service Reports for FY22, FY23, and FY24. The details can be found in Appendices E, G, and I, respectively. **There were no adverse impacts** found for minority or routes with vehicle headways (trips per hour) for weekday peak, Saturday, and Sunday service. For weekday off peak, an **insignificant adverse impact was found** of 2.2% greater headways for minority routes. PRT will keep an eye on this service standard as it adjusts schedules in FY2026 to avoid future significant adverse impacts.

On-Time Performance

On-time performance is covered in the Annual Service Reports for FY22, FY23, and FY24. The details can be found in Appendices E, G, and I, respectively. **There were insignificant adverse impacts** found for minority routes of 2.8% worse on-time performance. PRT will keep an eye on this service standard as it adjusts schedules in FY2026 to avoid future significant adverse impacts.

Out of Service

Out of Service is covered in the Annual Service Reports for FY23, and FY24 beginning with its development as a new service standard in the FY2023 Annual Service Report. The details can be found in Appendices G, and I, respectively. **There were no adverse impacts** for minority routes with no differences between groups in out of service.

Crowding – Significant Adverse Impact

Crowding is covered in the Annual Service Reports for FY22, FY23, and FY24. The details can be found in Appendices E, G, and I, respectively. **There were adverse impacts found for both minority and low-income routes with vehicle headways (trips per hour).**

For minority routes, the adverse impact was 433% greater than for non-minority routes. The actual levels of crowding are low even for these subgroups at only 1.1% and 0.2% of trips, respectively, but the way that PRT’s service policies are set this is still an adverse impact. PRT will specifically target addition of trips on the worst performing minority and low-income routes for FY2026 (calendar year 2025) to mitigate these adverse impacts.

Span of Service

Span of Service is covered in the Annual Service Reports for FY22, FY23, and FY24. The details can be found in Appendices E, G, and I, respectively. **There were no adverse impacts** found for either minority or low-income routes with span of service.

Service Availability

This metric is not included in the Annual Service Reports. Average service availability for calendar years 2022-2024 is shown below. As of the end of 2024, 76.9% of Block groups within Allegheny County had transit service. 91.6% of minority Census Block groups have service and 68.6% of non-minority Census block groups had service. The difference between service availability on minority routes and non-minority routes was 23.01% in favor of minority block groups.

	Census Block groups Served	Meets Guideline?	Minority Census Block Groups Served	Non-minority Census Block Groups Served	Difference	Disparate Impact?
Block groups Served	817	Yes	351	466	+23%	No
Total Possible	1062		383	679		
Percent Served	76.9%		91.6%	68.6%		

Distribution of Transit Amenities

There were no disparate impacts identified with the distribution of PRT's transit amenities. These are not included in the Annual Service Reports. Details for each amenity category follow.

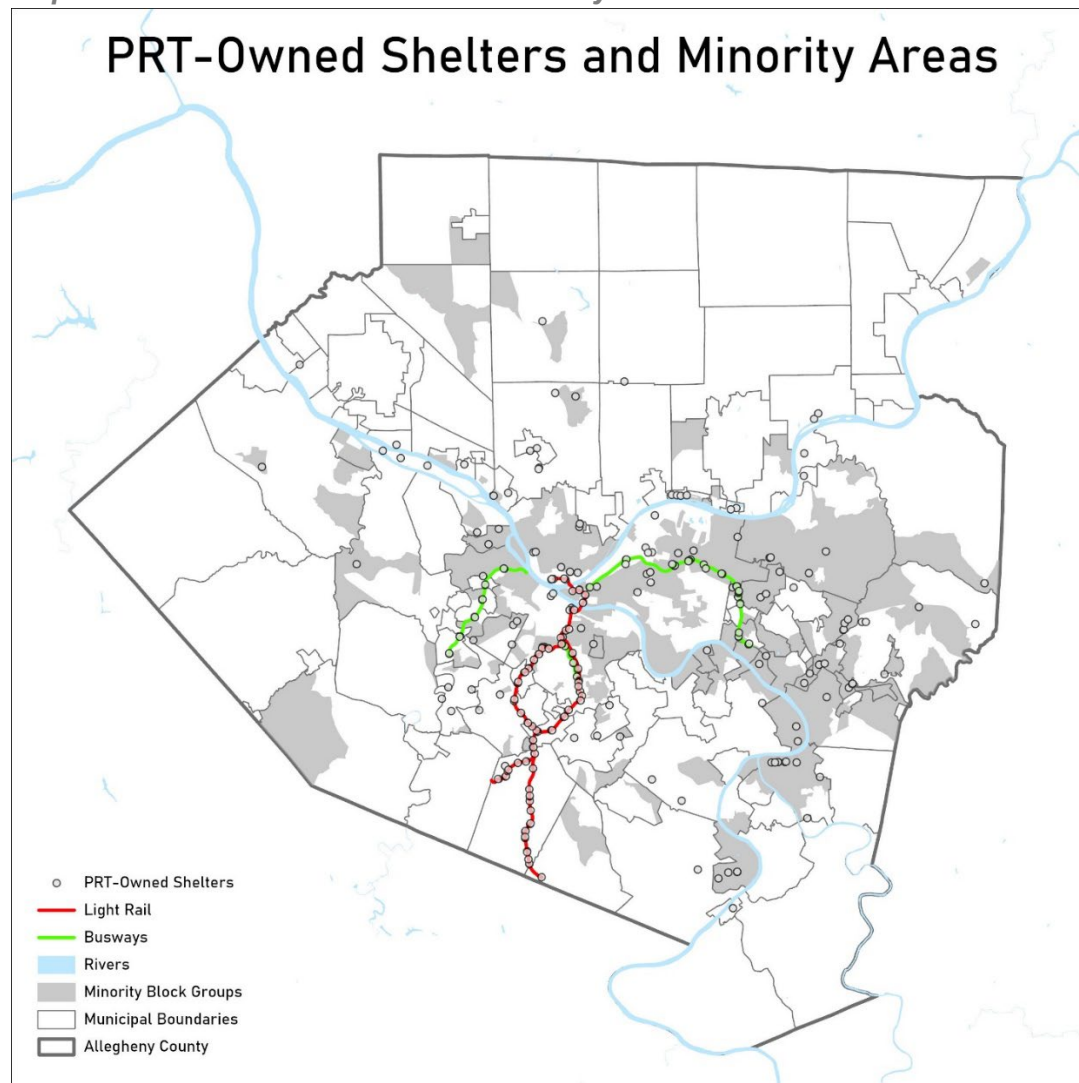
Seating

Seating is assumed to be located at places with shelter. See shelter section.

Shelters

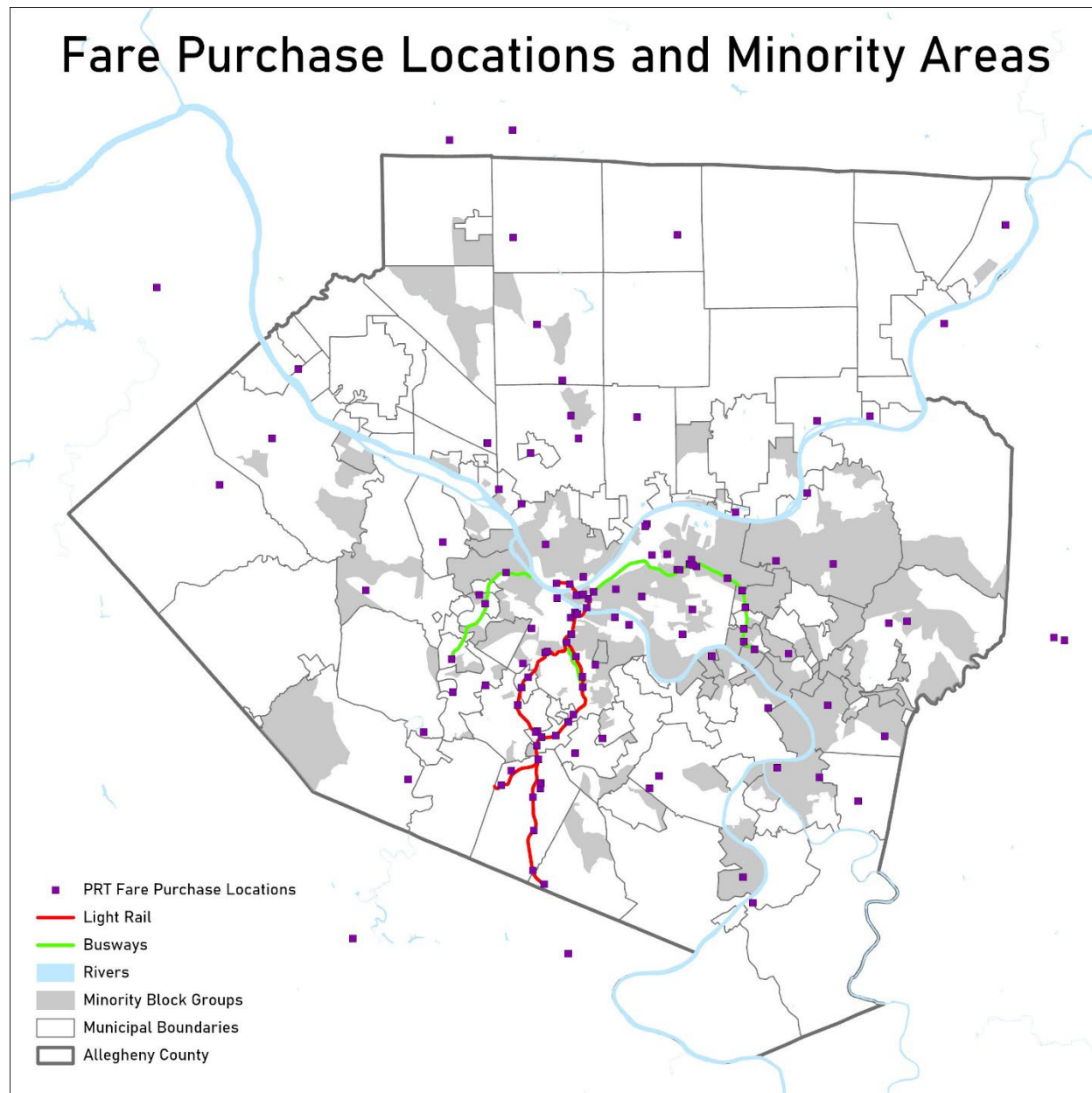
The total number of bus shelters and stations with shelter owned by PRT in 2024 was 311. Of these, 124 (39.9%) were in minority areas and 187 (60.1%) were not. The following map shows the location of these shelters and minority block groups. These figures do not include shelters which are owned by third parties. PRT places shelters based on gaps in existing advertising shelters which are owned by a third party and overseen by municipal governments. This equates to 0.98 stops/stations with shelters per square mile in minority areas, compared with 0.31 stops/stations with shelters per square mile in non-minority areas. Shelters are provided in minority areas at a 216% higher rate per square mile than in non-minority areas, so **there is no disparate impact in shelter locations.**

Map of PRT Shelter Locations and Minority Areas



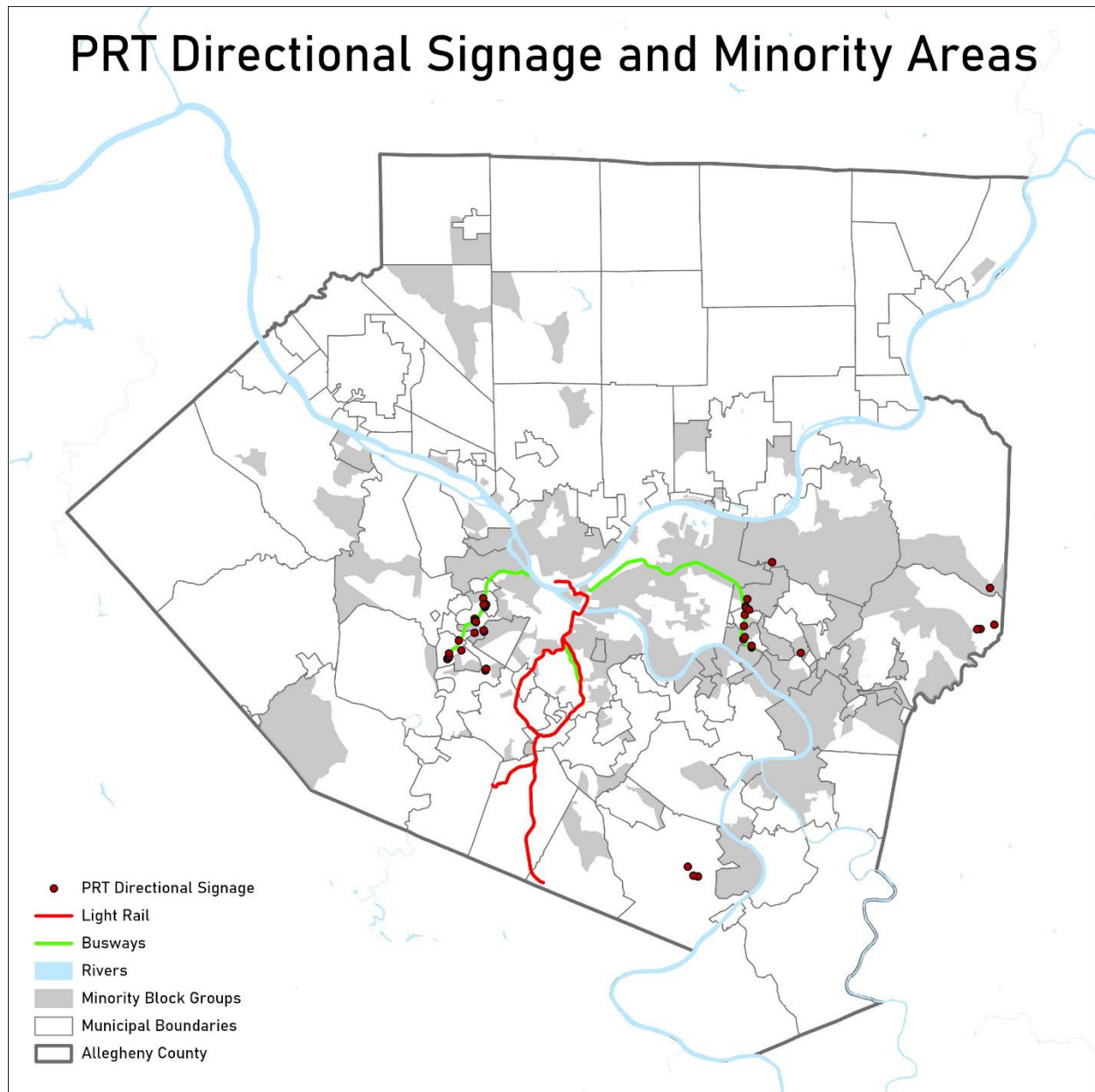
Fare Product Purchase Locations

PRT has 120 locations where fare products can be purchased. 112 of these locations are within the county: 40 in minority areas and 72 in non-minority areas. The following map shows these locations. This equates to 0.32 locations per square mile in minority areas, and 0.12 locations per square mile in non-minority areas. Minority areas therefore have nearly three times the number of locations where fares can be purchased per square mile than non-minority areas, indicating no disparate impact with regards to fare purchase locations. In August 2023, PRT initiated a partnership with Vanilla Direct to expand access to purchase PRT fare products at third-party locations across the county. These additional sites are not included in this map or analysis, as PRT does not control the hundreds of locations which are part of the Vanilla Direct Network.



Signs and Maps

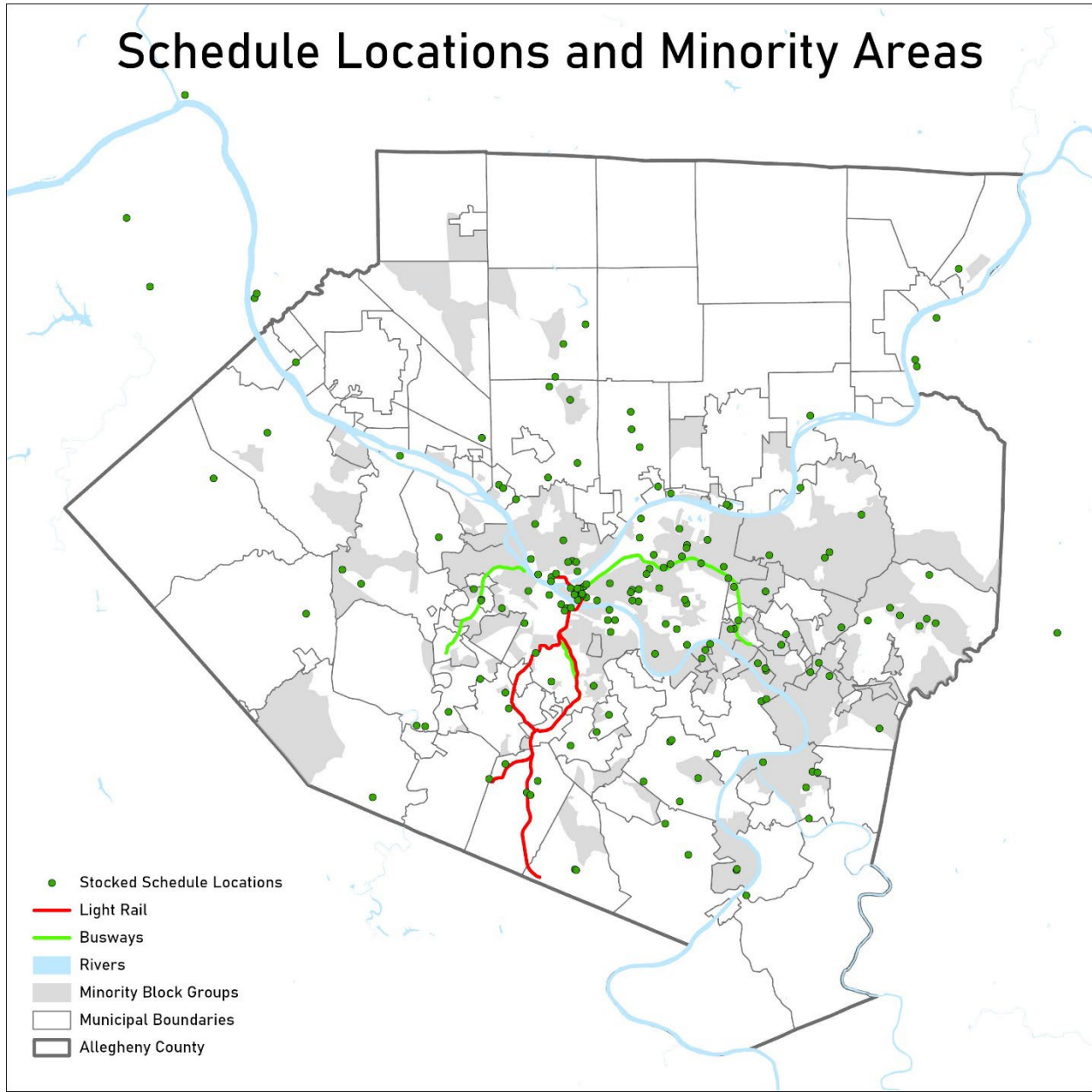
PRT maintains wayfinding signage outside of fixed guideway stations and park-and-ride facilities. 17 out of 46 directional/wayfinding signs identified are located within minority block groups, representing a density of 0.13 per sq mile. This compares to a density of 0.05 in non-minority block groups across PRT's service area, indicating no adverse finding on the distribution of directional signage.



Schedules

Route schedules are sent to 170 unique locations around Allegheny County where they are stocked. PRT sends schedules to various other agencies as they are requested, but these are not under the control of PRT and as such are not included in this analysis. There are also 11 locations outside of the county that are not included in this analysis. The following map shows the stocked schedule locations and minority block groups. Of these 170 unique locations, 75 of them are in minority areas (44%), and 95 are in non-minority areas (56%). This equates to 0.59 locations per square mile in minority areas, and 0.16 locations per square mile in non-minority areas. Minority areas therefore have around four times the access to printed schedule materials as non-minority areas, so there is no disparate impact with regard to schedule stock locations.

Map of Actively Stocked Schedule Locations and Minority Areas

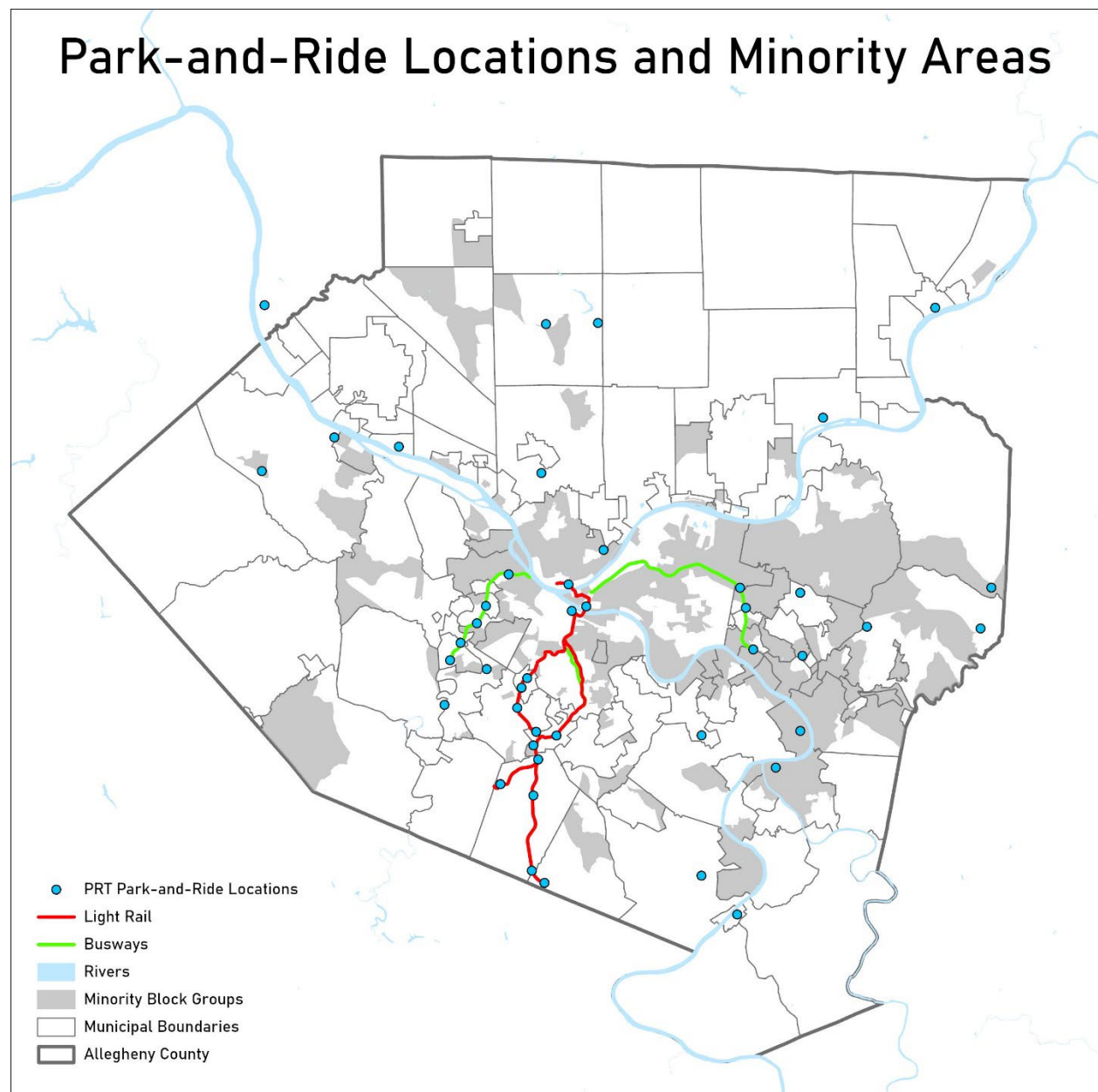


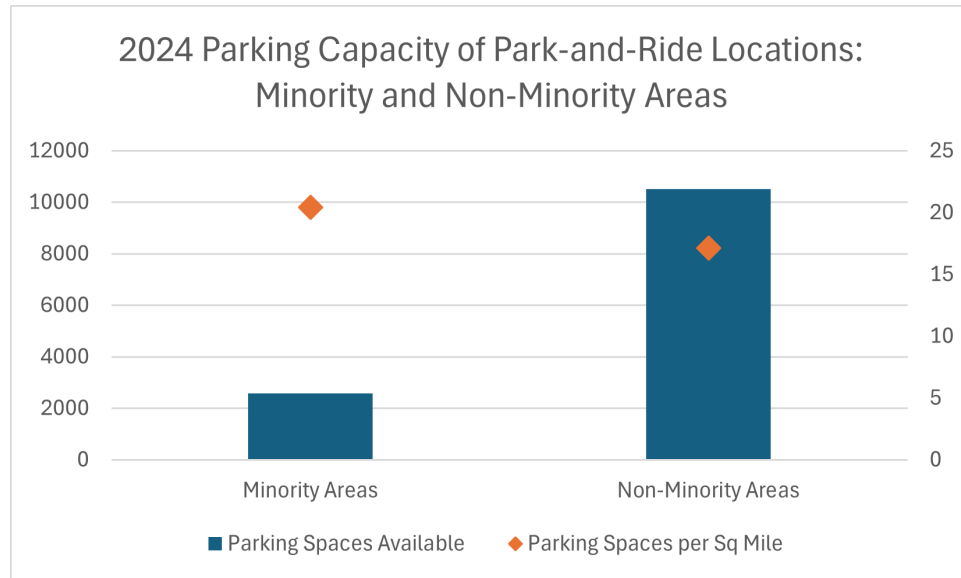
Waste Receptacles

PRT does not maintain waste receptacles beyond those found at fixed guideway stations.

Park and Ride Lots

In 2024, there were approximately 12,927 parking spaces across 43 Park-and-Ride locations operated by PRT throughout Allegheny County. The map below shows the location of these park and Ride lots and minority block groups. 12 of these sites are located in minority areas, providing an average of 20 parking spaces per square mile in minority areas. In non-minority block groups, the average parking spaces per square mile is 17. This is shown in the chart on the following page. Minority block groups feature more Park-and-Ride spaces per square mile than non-minority block groups, indicating no disparate impact in the availability of parking.





Escalators/Elevators

PRT does not maintain escalators or elevators beyond those found at fixed guideway stations.

Vehicle Assignment

In order to analyze vehicle assignment by age, a single quarter sample (September - November) of routes is taken each year. This data is then matched with vehicle age at that time for each vehicle in the system. These matched data are then aggregated for the whole quarter to determine an average age of vehicles sampled on each route in the system. Routes are then aggregated based on their minority/non-minority status to develop an average age per vehicle in each of these two route groups.

The results in the table below indicate a small disparate impact exists between minority and non-minority route bus ages. On average, buses on minority routes were 4.17% or 0.25 years older than vehicles on non-minority routes. This is largely due to the older average age of articulated vehicles at East Liberty and West Mifflin garages, which have a high number of minority routes. These larger vehicles are more likely to be assigned to minority routes to prevent overcrowding due to high ridership. In 2024 the average age of articulated vehicles was 0.5 years older than 40-foot vehicles. This has improved each year as new articulated vehicles enter the fleet.

Year	Sample Size	Sample Size - Minority Routes	Sample Size - Non-Minority Routes	Average Age - Minority Routes	Average Age - Non-Minority Routes	Difference	Pct Difference	Disparate Impact?
2022	316,022	166,129	149,893	5.47	5.10	0.38	7.40% older	No
2023	307,511	170,399	137,112	6.22	5.98	0.23	3.85% older	No
2024	320,837	166,596	154,241	7.02	6.86	0.16	2.31% older	No
Summary	944,370	503,124	441,246	6.23	5.98	0.25	4.17% older	No

Approval from Board on Monitoring Program

In addition to the Annual Service Reports, which approve Title VI analyses for on-time performance, out of service, crowding, service span, and trips per hour, a copy of the Board resolution amending and approving PRT's full Title VI Program can be found in Appendix K.

CHAPTER 5 EVALUATION OF MAJOR SERVICE AND FARE CHANGES

Policies and Procedures

Disparate Impact and Disproportionate Burden Policy

A copy of PRT's Disparate Impact and Disproportionate Burden Analysis Policies for Major Service Changes or Fare Changes can be found in Appendix L. This document defines major service changes, disparate impacts, disproportionate burdens, and the thresholds used to determine if significant, adverse impacts exist. This policy has not changed since the prior Title VI Program submission to the FTA.

As a summary of the policy document that informs the analyses on the following pages, both disparate and disproportionate impacts are determined to be present when adverse service or fare changes impact minority and/or low-income groups at a level 20% or more higher than their counterparts.

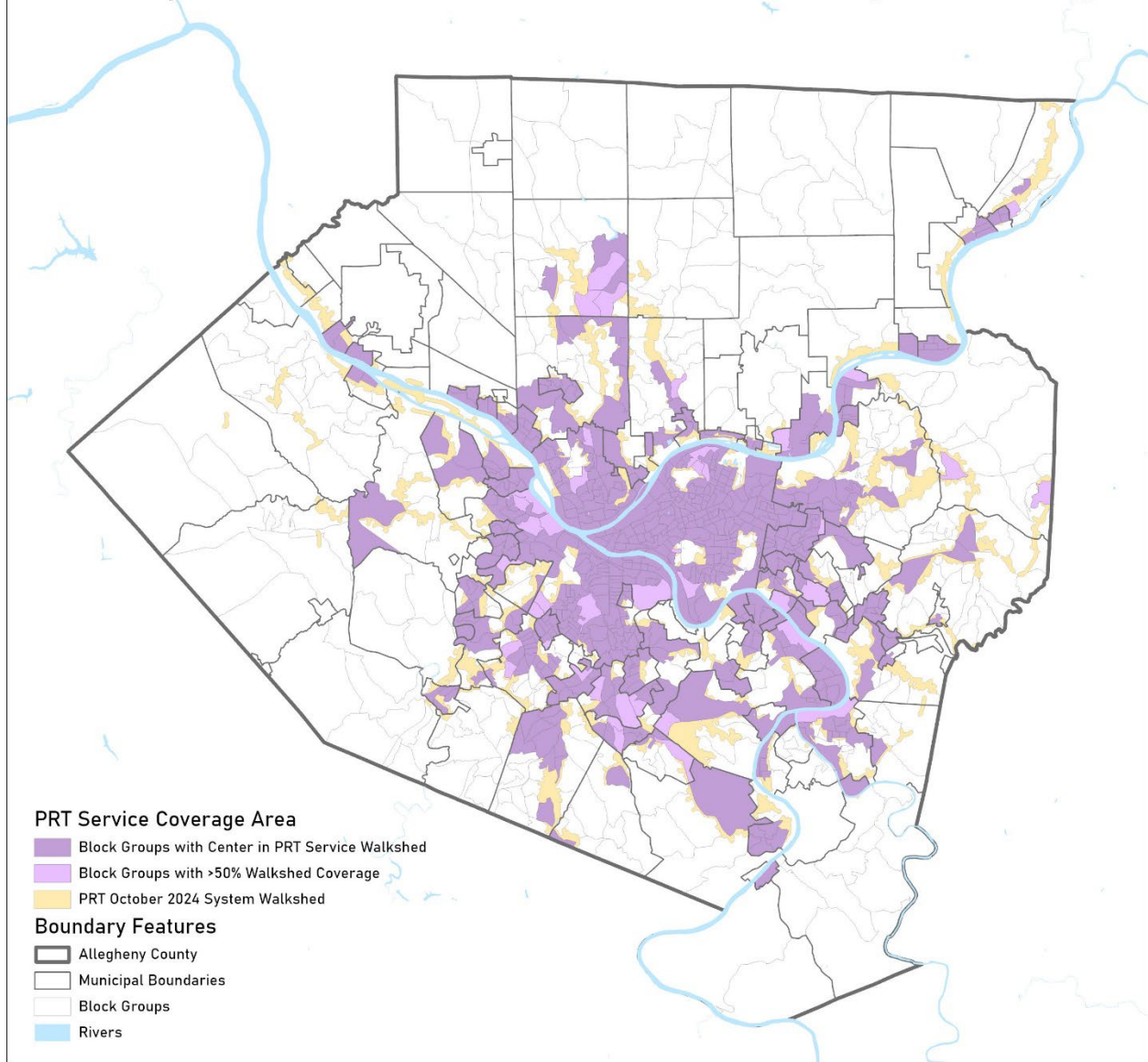
Data Analysis Procedures for Conducting Service Equity Analyses

To analyze major service changes for both potential disparate impacts and disproportionate burdens, the percentage of the targeted population (minority or low income) along the route is calculated. First, census block groups that are impacted by the service change are identified using Geographic Information Systems software. All block groups with centroids overlapping the system walkshed are included; additionally, any block groups with greater than 50% of their area falling within the system walkshed are also included, even if the centroid does not fall into the walkshed. The latter method can help to resolve limitations to the street network, topographic constraints, and other variables which might otherwise exclude block groups in which there is considerable access to PRT service.

Once the block groups have been selected according to the method described above, the most recent available data from the American Community Survey is used to determine the total population, minority population, and low-income population within the affected area. The percentages of minority and low-income residents are then compared to the target population of the entire service area to determine the differential impact on these populations compared to the average across the entire service area. If the difference between the targeted population in the proposed change and the targeted population of the entire area is greater than 20%, then a disparate impact or disproportionate burden is identified.

If a disparate impact without adverse effects (i.e. service improvements) is found to be within a non-targeted group, an explanation of how PRT plans to improve service for the targeted group is given. This method of demographic analysis was used for the disparate impact and disproportionate burden analyses for each route change.

PRT System Walkshed & Block Group Coverage



Data Analysis Procedures for Conducting Fare Equity Analyses

PRT conducts its Fare Equity Analyses by testing whether a potential fare change has either a disparate impact on minority riders or a disproportionate burden on low-income riders. PRT obtains its base data by conducting a rider survey after management discussions are conducted as to when a fare change will be required. In some cases, PRT will utilize census data to determine fare change impacts on neighborhoods.

The effects of a fare structure change are examined for disparate impact by comparing average weighted fares, calculated by combining the number of minority and non-minority riders using each fare option and the per ride change in that fare. Any difference in the percent change of the average fare of +/-20% between the two groups will signal a disparate impact. Likewise, PRT tests potential fare changes for a disproportionate burden on low-income riders. Once again, the effects of a fare structure are examined by

comparing the average weighted fare, calculated by combining the number of low income and non-low-income riders using each fare option and the per ride change in that fare. Any difference in the percent change of the average weighted fare of +/-20% between these two groups will likewise signal a disproportionate burden.

Service and Fare Equity Analyses

Fare Equity Analyses

Summary of Fare Changes During 2022 - 2024 Period

Note: PRT implemented a major fare change on January 1st, 2022. Detailed information about proposed fare changes officially became available at the March 18, 2021 Planning & Stakeholder Relations Committee meeting and was posted on www.portauthority.org shortly thereafter on a special page that provided an overview of the proposal. Beginning March 26, 2021, and ending on May 5, 2021, members of the public could review the proposed fare changes and submit comments. A full summary of the public comment period and the Title VI Analysis and Board Approvals can be found in Appendices M and N, respectively.

2024 Proposed Fare Changes (implemented in Q1 2025)

In 2023, PRT received a grant from the Heinz Endowments to conduct a limited scope and time universal pass program pilot study. Following the pilot and a further analysis conducted by PRT in coordination with its outside fare consultant, PRT's Board authorized PRT via resolution passed on July 26, 2024, to conduct a formal public comment period, including a public hearing, to receive public comment for a proposed permanent universal pass program that would be made available to qualified employers, multifamily properties, and schools and known as the PRTner Pass program.

The PRTner Pass program would be offered to secondary and post-secondary schools that are not eligible to participate in PRT's University Pass Program, to residential multifamily properties with 10 or more units in one physical location, and to employers with 10 or more eligible employees. The PRTner Pass would be valid for unlimited use on PRT buses, light rail, and incline service. The PRTner Pass program would require the participating entity to purchase passes for 100% of their eligible employees, students, and apartment or housing units, with limited exceptions, such that the cost is pooled. The program was proposed to offer passes, at least initially, at an approximately 70% discount from PRT's full fare 31-day/monthly pass rate - or \$28.00 per pass per month - through PRT's Ready2Ride account-based ticketing application.

The public comment period for the proposed PRTner Pass Program commenced on August 12, 2024, and ended on October 11, 2024, and included two public informational sessions on September 10, 2024, and a public hearing on September 12, 2024, along with other public engagement activities and the invitation for and receipt of written comments submitted to PRT by U.S. mail, online and via recorded voice message.

The PRTner pass program was approved by the Finance committee and, subsequently, the full Board in November of 2024. PRT intends to implement the program in Q1 of calendar year 2025. A full summary of this Title VI Analysis and Board Approval is included as Appendix O and P respectively and will be included in the next Title VI Program Submission as well since the implementation technically occurred in 2025.

Major Service Change Equity Analyses

Summary of Major Service Changes During 2022 – 2024 Period

Between January 2022 and December 2024, the PRT completed 6 Major Service Changes as affecting more than 30% of a route's weekly trips, directional miles, service hours or addition of a service day. The type of change and year of change is listed in the table below.

Route	Description of Change	Date of Change
Route 40	Addition of weekday service hours (+46%)	June 2022
Route 61D	Reduction of weekly service miles and hours (-25%, considered major for purposes of simplified public engagement)	October 2023
Route 71A	Reduction of weekly service miles and hours (-36%)	
Route 71C	Reduction of weekly service miles and hours (-29%, considered major for purposes of simplified public engagement)	
Route 71D	Reduction of weekly service miles and hours (-40%)	
Route P17	Addition of weekday service hours and miles (+109%)	

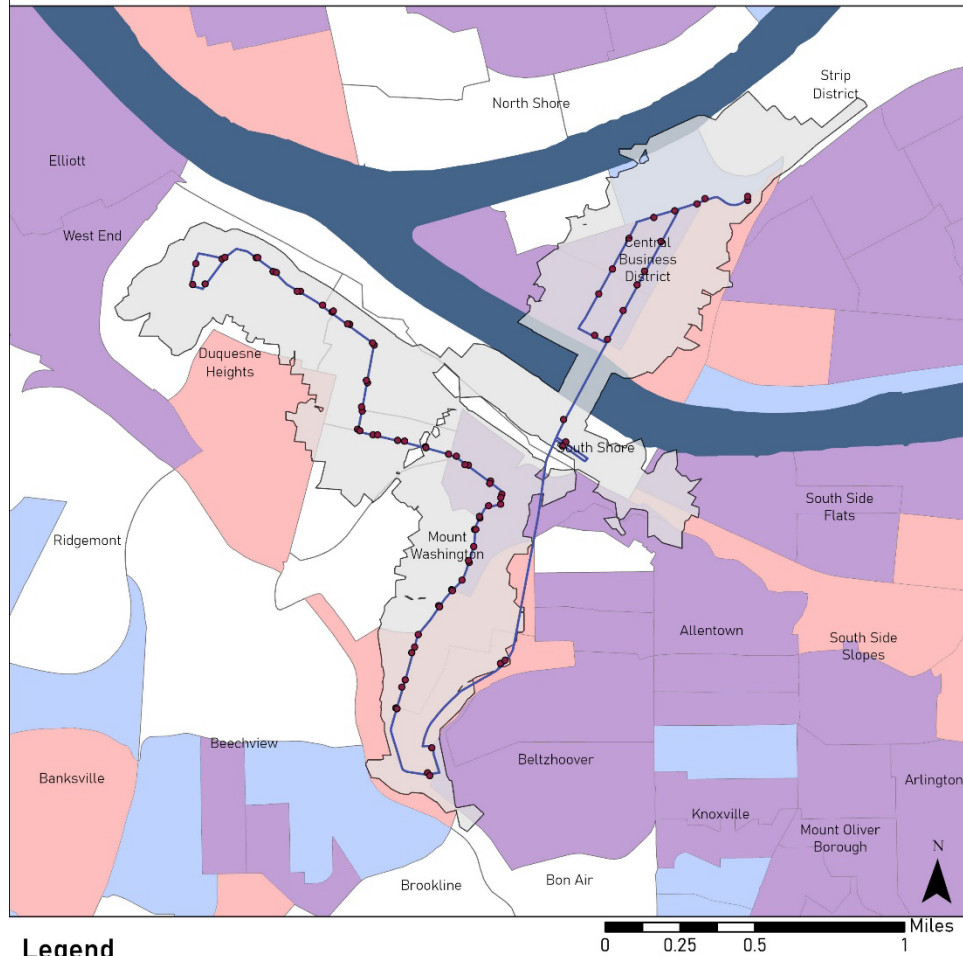
Route 40 Major Service Change Equity Analysis

Route 40 received a major service increase with the June 2022 schedule changes to reflect PRT's Monongahela Incline Rehabilitation Project's impact on the Mt. Washington neighborhood community within the City of Pittsburgh. This route generally follows the pathway that the Incline (funicular) takes from the South Side neighborhood (bottom of the Incline) to the Mt. Washington neighborhood (top of the Incline), and due to a planned closure of the incline for a handful of months for the rehabilitation, service on Route 40 was almost doubled to better provide this connection up to the top of Mt. Washington via another mode.

However, the Incline project was not completed on time, and thus the service was not, and is still not, reduced back to its original level. As a result of this, the Title VI analysis of this major service addition was not completed prior to or after the service change but was discovered upon scanning all service change levels as a quality control check in the development of the first draft of this Title VI Program document.

Thus, the Title VI analysis is included below. This was an addition of service for a low income, non-minority designated route.

Major Service Change: Route 40 Service Increase Effective June 2022



Route	Minority Population in Service Block Groups	Minority Population in Allegheny County	Percent Change from Service Area	Exceeds Disparate Impact Threshold (>20%)?	Low Income Population in Service Block Groups	Allegheny County Low Income Population	Percent Change from Service Area	Exceeds Disparate Impact Threshold (>20%)?
40 Mount Washington	= 1910/9840 = 19.4%	24.6%	-21.1%	No	= 860/8513 = 10.1%	12.6%	-11.9%	No

Route 61D, 71A, 71C, and 71D Major Service Change Equity Analyses

The Title VI equity analyses, summary of public comment period, and Board approvals for these major service reductions can be found in Appendices Q, R, and S respectively.

Route 17 Major Service Change Equity Analysis

The Title VI equity analysis and Board Approval for this major service addition can be found in Appendices T and U, respectively.

CHAPTER 6 COMPLIANCE AND COMPLAINTS

Federal Civil Rights and DOT Title VI Standard Assurances

Please see Appendix A which includes certification that all Assurances have been signed.

DOT Title VI Approval by Board

Please see Appendix K for full program approval by Board.

List of Locations and Instructions to the Public for Filing a Title VI Complaint

PRT prominently displays information to the public on how to file a Title VI complaint inside all of its transit vehicles, within printed schedules, and on the website (see image examples below and on the following page). PRT provides a specific submission portal for logging Title VI complaints and additionally provides an option within its general feedback/complaint portal for users to indicate discrimination. It is also possible for the public to submit complaints via email, in written form in-person or mailed to the main offices, or by calling customer support (with TTY services offered for the hearing impaired). PRT's online submission form for Title VI complaints is viewable at the following URL:

<https://www.rideprt.org/contact/contact-us2/title-vi-discrimination-complaint-form/#:~:text=PRT%20is%20committed%20to%20ensuring,Act%20of%201964%2C%20as%20amended>

Title VI Notice to the Public Sign on Transit Vehicles:

Title VI-Notice To Public

Pittsburgh Regional Transit (PRT) hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964. PRT is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service furnished by PRT on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.


Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a complaint with PRT. A complaint must be filed within 180 days after the date of the alleged discrimination.





Any person who requires additional information concerning this notice or believes that they have been subjected to discrimination and would like to file a complaint should provide written notice to the PRT Customer Service Department at either the address or website listed below:




Customer Service Department • Pittsburgh Regional Transit • 345 Sixth Avenue • 3rd Floor
Pittsburgh, PA • 15222-2527 • rideprt.org



PRT 12/20/2020

Title VI Complaint Process and Contact Form, PRT Website



[Schedules](#) [Rider Info](#) [Fares](#) [Services](#) 



 [TRIP TOOLS](#) [SEARCH](#)

TITLE VI COMPLAINT PROCESS AND CONTACT FORM

[Home](#) > [Contact Us](#) > Title VI Discrimination Complaint Form

All our customers, clients, and members of the public, should you believe you have been subjected to discrimination or should you believe you have been adversely affected resulting from a complaint based on:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on **race, color, or national origin** (including **language**).
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on **disability**.
- Title IX of the Education Amendments Act of 1972, which prohibits discrimination based on **sex** in education programs or activities.
- Age Discrimination Act of 1975, which prohibits discrimination based on **age**.
- U.S. Department of Homeland Security regulation 6 C.F.R. Part 13, which prohibits discrimination based on **religion** in social service programs.

You are encouraged to report any known or suspected violations using the [form below](#).

Fields marked with an asterisk (*) are required.

Pittsburgh Regional Transit (PRT) hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964. PRT is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of transportation service furnished by PRT on the basis of race, color or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes and location of routes may not be determined on the basis of race, color or national origin.

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color or national origin may file a complaint with PRT. A complaint must be filed within 180 days after the date of the alleged discrimination.

Any person who requires additional information concerning this notice or believes that they have been subjected to discrimination and would like to file a complaint should provide written notice to the PRT Customer Service Department.

Pittsburgh Regional Transit Title VI Discrimination Complaint Process

All PRT customers, clients, and members of the public, should you believe you have been subjected to discrimination based on race, color or national origin, or should you believe you have been adversely affected resulting from a complaint based on race, color or national origin, are encouraged to report any known or suspected violations by scrolling down to the form below.

In addition to the online form, reports can be submitted:

By emailing PRT's Program Manager - Office of Equal Opportunity at OfficeofEqualOpportunity@rideprt.org.
In writing and mailed to Pittsburgh Regional Transit, Office of Equal Opportunity, 345 Sixth Avenue, Floor 3, Pittsburgh, PA 15222
By calling Customer Service at 412-442-2000 (412-231-7007 for TTY)

Complaints must be received within 180 days from the date when the stated discrimination occurred.

<https://www.rideprt.org/contact/contact-us2/title-vi-discrimination-complaint-form/>

Notice on paper and pdf timetables/transit schedules

SOUTH SIDE

South Side - Mt. Oliver - Bon Air

Penn Ave at Main St	Oakland Fifth Ave	South Side at University Pl E Carson St at S 21st St	Mount Oliver Brownsville Rd at Goldbach Way	South Hills Junction at Bus Turnaround	Bon Air McKinley St past Brownsville Rd	Bon Air Drycove St at Conniston Ave	Bon Air McKinley St at Brownsville Rd
7:03	7:16	7:22	7:30	7:37
.....	8:00	8:06	8:13	M 8:15
.....	8:56	9:02	9:10	9:17
.....	9:40	9:46	9:53	M 9:55
.....	10:36	10:43	10:51	10:58
.....	11:20	11:27	11:35	M 11:37
.....	12:17	12:24	12:32	12:38
.....	12:55	1:02	1:10	1:12	1:16	1:19
.....	1:55	2:03	2:12	2:19
.....	2:38	2:44	2:52	2:54	2:58	3:01
.....	3:33	3:41	3:50	3:57
.....	4:15	4:23	4:31	4:33	4:37	4:40
.....	5:14	5:22	5:31	5:38
.....	5:54	6:02	6:10	6:12	6:16	6:19
.....	6:56	7:04	7:12	7:18
.....	7:37	7:45	7:53	7:55	7:59	8:02
.....	8:34	8:42	8:50	8:57
.....	9:16	9:24	9:32	9:34	9:38	9:42
.....	10:16	10:24	10:32	10:38
.....	10:56	11:02	11:09	11:11	11:15	11:18
.....	11:56	12:02	12:09	12:15
.....	12:36	12:42	12:49	12:51	12:55	12:58

Pittsburgh Regional Transit (PRT) hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964. PRT is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of transportation service furnished by PRT on the basis of race, color or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes and location of routes may not be determined on the basis of race, color or national origin.

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color or national origin may file a complaint with PRT. A complaint must be filed within 180 days after the date of the alleged discrimination.

Any person who requires additional information concerning this notice or believes that they have been subjected to discrimination and would like to file a complaint should provide written notice to the PRT Customer Service Department at either the address or website listed below:

Customer Service Department
Pittsburgh Regional Transit
345 Sixth Avenue, 3rd Floor
Pittsburgh, PA 15222-2527
www.RidePRT.org

WE'RE HIRING

Pittsburgh Regional Transit is looking for some new faces. We offer great pay and benefits, and a direct route to a great future.

Go to ridePRT.org/careers

PRT is an Equal Opportunity Employer.

Notice of Nondiscrimination

The following is PRT's Notice of Nondiscrimination:

PITTSBURGH REGIONAL TRANSIT NOTICE OF NONDISCRIMINATION

Pittsburgh Regional Transit (PRT) complies with Federal civil rights laws and is committed to providing its programs and services without discrimination or retaliation in accordance with:

- *Title VI of the Civil Rights Act of 1964*, which prohibits discrimination based on **race, color, or national origin** (including language).
- *Section 504 of the Rehabilitation Act of 1973*, which prohibits discrimination based on **disability**.
- *Title IX of the Education Amendments Act of 1972*, which prohibits discrimination based on **sex** in education programs or activities.
- *Age Discrimination Act of 1975*, which prohibits discrimination based on **age**.
- *U.S. Department of Homeland Security regulation 6 C.F.R. Part 19*, which prohibits discrimination based on **religion** in social service programs.

To File a Complaint

If you think that PRT has failed to provide these services or discriminated or retaliated in another way based on race, color, national origin (including language), disability, sex, age, or religion, you can file a complaint online at www.RidePRT.org or in writing by mail, or email to: Program Manager - Office of Equal Opportunity, Pittsburgh Regional Transit, 345 Sixth Avenue, FL 3, Pgh., PA 15222 or OfficeofEqualOpportunity@RidePRT.org.

You can also file a civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL):

E-mail: CRCLCompliance@hq.dhs.gov (fastest method to submit your complaint)

Fax: 202-401-4708

U.S. Mail:

U.S. Department of Homeland Security
Office for Civil Rights and Civil Liberties
Compliance Branch

245 Murray Lane, SW

Building 410, Mail Stop #0190

Washington, D.C. 20528

For additional information: www.dhs.gov/crcl

Phone: 202-401-1474 Toll-Free: 1-866-644-8360

Information and Services for Persons with Disabilities and Persons with Limited English Proficiency

PRT:

- Provides free aids and services, such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, etc.), to communicate effectively with persons with disabilities.
- Provides free language services, such as qualified foreign language interpreters and information written in other languages, to ensure meaningful access to programs and activities for persons with limited English proficiency.

If you need these services, please contact:

Director of Customer Service Department
Pittsburgh Regional Transit

345 Sixth Ave., FL 3, Pgh., PA 15222

Phone: 412-442-2000 (412-231-7007 for TTY)

Discrimination Complaint Process

All PRT customers, clients, and members of the public, should you believe you have been subjected to discrimination based on race, color or national origin, or should you believe you have been adversely affected resulting from a complaint based on race, color or national origin, are encouraged to report any known or suspected violations.

Reports can be submitted:

- Online at www.rideprt.org
- By emailing Judy Kalnas, PRT's Program Manager – Office of Equal Opportunity, at Office ofEqualOpportunity@rideprt.org or at customerservice@rideprt.org.
- In writing and mailed to PRT, Office of Equal Opportunity, 345 Sixth Avenue, Floor 3, Pittsburgh, PA 15222
- By calling Customer Service at 412-442-2000

Complaints must be received within 180 days from the date when the stated discrimination occurred.

All complaints are reviewed by, and if required, investigated by the Program Manager – Office of Equal Opportunity. Upon receipt of the complaint, you will be informed that an investigation of the complaint will be conducted, and that immediate corrective action will be taken, if appropriate.

Following the complaint investigation, you will be notified in writing of the results. Complaints and investigative files of the complaints are maintained by the Office of Equal Opportunity for a minimum of seven years.

Preliminary Inquiry

1. Upon receiving the complaint, PRT's Program Manager – Office of Equal Opportunity will conduct a preliminary inquiry to determine the need for further investigation.
2. The Program Manager – Office of Equal Opportunity will notify you in writing that a preliminary inquiry is underway to determine the need for further investigation.
3. If the preliminary inquiry indicates that an investigation is warranted, you will be notified in writing, and an interview will be scheduled.
4. If the preliminary inquiry indicates an investigation is not warranted, you will be notified in writing of the reasons why and factors considered.

Complaint Processing

If the complaint is within the jurisdiction of PRT, or informal resolution was not possible, it will be promptly and impartially investigated.

PRT's goal is to address complaints within 90 days of receipt, though the time to carefully investigate complaints may be longer depending on the nature of the complaint and complexity of the issue.

You will be notified in writing of the results of the investigation, what actions will be/have been taken in response, and a timeline to request review.

A full list of all complaints filed between January 1, 2022, and December 31, 2024, can be found in Appendix T.

Investigative Process

Following the initial inquiry, and dependent on the nature of the complaint, the Program Manager – Office of Equal Opportunity will investigate formal discrimination complaints in conjunction with PRT's Service Planning and Development, Operations or Customer Service Departments.

The investigation includes obtaining relevant facts, such as information from the preliminary inquiry.

Upon the conclusion of the investigation, a report is prepared detailing facts obtained, investigation findings, and a summary provided to you in writing, along with any recommended corrective action, if necessary.

APPENDICES

Appendix A – Title VI Assurances to the FTA

Certifications and Assurances

Fiscal Year 2024

FEDERAL FISCAL YEAR 2024 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit

The Applicant certifies to the applicable provisions of all categories: *(check here)* _____.

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	<u>X</u>
02 Public Transportation Agency Safety Plans	<u>X</u>
03 Tax Liability and Felony Convictions	<u>X</u>
04 Lobbying	<u>X</u>
05 Private Sector Protections	<u>X</u>
06 Transit Asset Management Plan	<u>X</u>
07 Rolling Stock Buy America Reviews and Bus Testing	<u>X</u>
08 Urbanized Area Formula Grants Program	<u>X</u>
09 Formula Grants for Rural Areas	<u></u>
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	<u>X</u>
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<u>X</u>

Certifications and Assurances

Fiscal Year 2024

12	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	<u>X</u>
13	State of Good Repair Grants	<u>X</u>
14	Infrastructure Finance Programs	<u>X</u>
15	Alcohol and Controlled Substances Testing	<u>X</u>
16	Rail Safety Training and Oversight	<u>X</u>
17	Demand Responsive Service	<u>X</u>
18	Interest and Financing Costs	<u>X</u>
19	Cybersecurity Certification for Rail Rolling Stock and Operations	<u>X</u>
20	Tribal Transit Programs	<u></u>
21	Emergency Relief Program	<u>x</u>

CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

Name of the Applicant: Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.


The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

Certifications and Assurances

Fiscal Year 2024

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.


Signature  Date: 10/10/24
Name Katharine Kelleman, Chief Executive Officer Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature  Date: 10-8-2029
Name Michael J. Cetra, Chief Legal Officer Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

Appendix B – Summary of Outreach Efforts 2022 - 2024

2022						
Date	Event/Fair/Meeting	Location	Contact Person	Phone	Time	Staff
13-Jan	Spirit of King	Virtual	Dante Calderone Marketing	412-566-5283	10:00 AM	D. Calderone
14-May	Clairton Community Expo	1800 West Street 4 th Floor Homestead PA 15120	James Phillips Manager SAP and Prevention Services	412-862-5565	10 AM - 2 PM (Rain date 5/21 at 10 AM - 2 PM)	G. Huetter D. Phillips
26-May	Rep Dan Miller 9 th Annual Disability & Mental Health Summit	Beth El Congregation 1900 Cochran Road Pittsburgh, PA 15220	Cheryl Cohen or Jennifer Rick	412-343-3870	11 AM - 2 PM	D. Phillips
5-Jun	SisTers PGH People's Pride Parade Swissvale Pride	Edgewood Town Center to Dickson School 7301 Schoyer Avenue Pittsburgh, PA 15218	Ciora Thomas Founder	412-297-0548	10 AM - 4 PM	F. Duse
13-Jun	Downtown Safety Coalition Pop-Up Resource Youth Event	Market Square Pittsburgh, PA 15222	T AMara L. Collier	412-894-7333 (W) 412-295-6441 (M)	2 PM - 5 PM	F. Duse Chief Porter
15-Jun or rain 6/16	58 th Annual Good Neighbor Day City of McKeesport	5 th Avenue from Market-Locust Streets McKeesport, PA 15132	James Phillips, Mgr. Jen Vertullo Asst to Mayor	412-862-5565 (J. Phillips) 412-675-502 Ext. 605 (L. Vertullo, Office)	10 AM - 4 PM	D. Phillips
18-Jun	Juneteenth Jubilee	Line Up Crawford and Center Avenues Pittsburgh, PA 15219	William Marshall Parade Chairman	724-205-9376	12:00 PM	Company Wide
23-Jul	1 st Annual Disability Pride Pittsburgh	600 block of Fort Duquesne Blvd., bridge side only between 6 th and 7 th Avenues Pittsburgh, PA 15222	Tina Calabro tina.calabro@verizon.net or Vicki Landers Philadelphia, PA 19121	412-818-9169 (M)	1 PM - 5 PM	Gatesman Marketing
31-Jul	Clairton Community Day & City Centennial Celebration	Clairton Park Lodge 509 Mendelshon Avenue Clairton PA 15025	Denise Johnson Clemmons Chairperson and Rikell Ford	412-860-0521 (M) 412-759-2094 (M)	12 PM - 7 PM Set Up	Gatesman Marketing
3-Aug	MARC - Multi Agency Resource Center - Penn Hills	Municipal Bldg., Penn Hills Government Center 102 Duff Rd.,	Shannon Evans, Emergency/Risk Coordinator Allegheny County Department of Human Services	412-350-4031 (W) 412-670-8887 (M)	1 PM - 7 PM	D. Phillips

		Pittsburgh, PA 15235				
6-Aug	31 st Annual Duquesne Community Day Duquesne PartnerSHIP Health Fair	Memorial Park Grant Avenue & Maple Street Duquesne, PA 15110	Patricia Bluett mspathbluett@gmail.com	No phone # provided	11 AM - 4 PM	D. Phillips
10-Aug	Annual Clairton Student Information Day	Clairton Middle High School 501 Waddell Ave., Clairton, PA 15205	Maddie Nagel, MSW	412-303-7167 (M)	10 AM-1 PM	D. Phillips
11-Aug	Oakland Community Resource Fair	Community Resource Fair 200 Robinson Street Pittsburgh, PA 15213	Nadine Masagara Taylor Exec. Dir. Of the Corner Comcrpgh@gmail.com	412-436-9127 (W)	4 PM - 8 PM	D. Phillips
13-Aug	African American Heritage Day Parade	Homewood Brushton Pittsburgh, PA 15208	Shawn Hicks Shawn@saaccwp.com	412-392-0322 (W)	11 AM-1 PM	D. Phillips
13-Aug	11 th Annual Braddock Community Day	Braddock Civic Plaza 451 Braddock Avenue Braddock, PA 15104	Jim Phillips Natalie Morris	412-862-5565 412-273-1910	12 PM - 6 PM	D. Phillips
19-Aug	8 th Annual Ramp Crawl Organized by Oakland for All	4100 Forbes Ave Schenley Plaza Pittsburgh, PA 15213	Mavis Rainey, Exec Dir. Oakland Transportation Mgmt., Assoc.	412-779-5398 (M)	4 PM - 7 PM	D. Phillips
11-Sep	Touch-A-Truck Baldwin High School	Baldwin High School Parking Lot *4653 Clairton Blvd. Whitehall, PA 15236	Hannah Bower Whitehall Recreation Director	412-304-8347	2 PM - 6 PM	
23-Sep	"UPSKILL THE HILL" A Community Resource Fair	Carrick Community Pavilion 1529 Brownsville Rd., Pittsburgh, PA 15210	Pete Spyda Pete@tech25.org Tyler Vietmeier Tylers@tech25.org	412-251-6058 412-420-8785	2 PM - 5 PM	D. Phillips G. Huetter
6-Oct	Wesley High School Transition Fair	Wesley High School 5250 Caste Drive Pittsburgh, PA 15236	Christine Price Transition Program Supervisor	412-885-7017	9-11:30 AM	D. Phillips
2023						
12-Jan 2023 Spirit of King Award Cerem		Kingsley Center, East Liberty	Evelyn Newsome	412-566-5320	10AM - 12Noon	

17-Mar	3rd Annual Legislative Breakfast #MakeBlackMomsMatter	Virtual Keynote Speaker Latasha Mayes	D. Phillips	9am-11am
15-Apr	Black Birth Expo	August Wilson African American Cultural Center 980 Liberty Avenue Pittsburgh, PA 15222	Thelma Jackson	412-339-1011 12 Noon - 6:00 PM
11-May	Rep. Dan Miller 10th Annual Disability & Mental Health Summit	Beth El Congregation 1900 Cochran Rd Pittsburgh, PA 15220	Sheryl Cohen - District Officer Director	412-343-3870 11 am -1 pm
30-May	Duke Showcase Spring Event	Duquesne K-8 School 300 Kennedy Avenue Duquesne, PA 15110	Crystal Irli - Board Secretary main new contact: Erica Slobodnik	412-466-5300 x2219 (O) 11 am - 2 pm
31-May	Bus Field Trip for Students w/Visual Impairments-PSE Vision Program	ACCESS/Mobility Center 650 Smithfield Street Pittsburgh, PA 15222	Margaret Olisky	412-529-3123 (O) 412-612-3030 (M) 10:15pm - 12Noon
15-Jun	59th Annual Good Neighbor Day City of McKeesport	300 Block of Fifth Avenue Between Walnut and Locust Sts. McKeesport, PA 15132	Jennifer Vertullo Tom	412-885-3181 (M) 412-559-8025 (M) 10:00 AM - 4:00 PM
25-Jun	Swissvale People's Pride 2023	Dickson Elementary Field 7301 Schoyer Ave., Swissvale, PA 15218	Kassandra Manasse	412-297-0548 9AM-1PM
Saturday, July 15, 2023	Clairton CommUNITY Day	Clairton High School Yard 501 Waddell St Clairton, PA 15025	Rikell	412-568-3148 (M) 12 Noon - 5PM
8/12/2023	12th Annual Braddock Community Day	Civic Plaza on Braddock 415-6th Street Braddock, PA 15104	Jim Phillips	412-862-5565 (M) 12 Noon - 6PM
8/19/2023	Hill District Community Day	No Street #Address Centre Ave. & Addison Street And Centre Ave & Grove St. Pittsburgh, PA 15219	Clinetta Jackson	412-251-6062 12Noon - 5PM
8/25/2023	9th Annual Ramp Crawl Hosted by Oakland for All	Schenley Plaza 4100 Forbes Ave Pittsburgh, PA 15260	Mavis Rainey	412-779-5398 4PM - 7PM
	Annual Disability Pride Pittsburgh	Schenley Plaza	Vicki Landers	267-788-5946 (M) 11AM -4PM

	Hosted by Disability Pride PA	4100 Forbes Ave Pittsburgh, PA 15260			
8/26/2023					
Wednesday, October 4, 2023	The Wesley High School Transition Fair	Wesley High School 5250 Caste Drive Pittsburgh, PA 15236	Christine Waclawik Price	412-885-7017 (O)	9AM-11:30AM
2024					
Thursday, January 11, 2024	2024 Spirit of King Award Ceremony	Kingsley Center 6435 Frankstown Ave., (In the gym) Pittsburgh, PA 15206	Evelyn Newsome	412-566-5320	10AM - 12Noon
Thursday, April 25, 2024	MVPC - Mon Valley Providers Council/MVI - Mon Valley Initiative Expungement Clinic & Resource Fair		Annie Rummell	arummell@hscmonvalley.org 412-829-7112	12Noon-3PM
Saturday, May 4, 2024	Women's Health Fair	Hosanna House 807 Wallace Street (Enter in North Ave Entrance of the bldg, Important no steps) Wilkinsburg, PA 15221	De'Saundra Sullivan	412-342-1340	10AM-2pm
Thursday, May 16, 2024	Deborah Phillips Accessible Resources Event	OVR Bureau of Blindness & Visual Services Pittsburgh 531 Penn Ave., Pittsburgh, PA 15222	Spero Pipakis Business Serv., Rep.	412-565-5240 412-565-5518 (O) 412-580-3724 (C)	11:30AM-2PM
Thursday, May 16, 2024	Homewood Children's Village Health & Wellness Fair and Community Dinner at the Homewood YMCA	Homewood YMCA 7140 Bennett Street Pittsburgh, PA 15208			6PM-8PM Dinner
Saturday, June 1, 2024	Healthy Start - Black Birth - Exp	ACH Clear Pathways Kaufmann Center 510 Heldman St.	Yazmin Bennett-K	412-760-3570 Healthy Start	12PM-6PM
Saturday, July 13, 2024	Clairton CommUNITY Day 2024	Lawn next to Clairton Middle High School 501 Waddell Ave. Clairton, PA 15205	Dr. Rikell S. Ford rikellsford@gmail.com	412-568-3148	12PM-5PM
Saturday, July 27, 2024	Carrick Community Day	Community Pavilion 1529 Brownsville, Road	Tyler Vietmeier	tyler@tech25.org 412-212-0246	4-6PM
Saturday, August 10, 2024	13th Annual Braddock Community Day Civic Plaza on Braddock Ave	Civic Plaza 451 Braddock Ave Braddock, PA 15104	James Phillips	412-862-5565 (M)	12Noon-6PM
Saturday, August 24, 2024	3rd Annual Disability Pride Pittsburgh 2024	Schenley Plaza - Oakland 4100 Forbes Ave Pittsburgh, PA 15260	Vicki Landers	267-788-5946 (M)	11AM - 4PM
		Centre City Tower Bldg.	Jen Turner	412-566-5323	10-11AM

Appendix C – Language Assistance Plan

Placeholder – See PDF attachment.

Appendix D – Transit Service Standards

Placeholder – see pdf attachment.

Appendix E –Title VI Evaluation of Service Standards from FY2022 Annual Service Report

The link to the full FY2022 Annual Service Report, which is kept on PRT’s website, is

[https://www.rideprt.org/siteassets/inside-the-pa/transparency/annual-service-](https://www.rideprt.org/siteassets/inside-the-pa/transparency/annual-service-report/asr_fy2022_final_update.pdf)

[report/asr_fy2022_final_update.pdf](https://www.rideprt.org/siteassets/inside-the-pa/transparency/annual-service-report/asr_fy2022_final_update.pdf). Below are the Title VI Service Standard evaluation pages, extracted from the report.

TITLE VI

TITLE VI EVALUATION

PRT takes seriously its responsibility to serve communities that have the greatest need for public transit service. This includes two demographic communities which are protected under Title VI of the Civil Rights Act of 1964: minority race and ethnicity communities (“minority communities”) and low-income communities. The following section examines route performance to determine whether a significant performance difference exists between routes serving low-income and non-low-income communities, and routes serving minority and non-minority communities.

Routes are categorized as low-income or minority by whether their service areas have higher proportions of low-income and minority populations than the average of the PRT’s overall service area. In Allegheny County, the percent of low-income population is 11.63% (ACS 2019) and the percent of minority populations is 24.97% (Census 2020), but within PRT’s system walkshed there is an average of 30.8% minority and 18.6% low-income populations. In PRT’s 2022-2024 Title VI Program, PRT is using the walkshed metrics instead of the entire county as the “service area.” Any area with a low-income or minority population composition exceeding the 18.6% and 30.8% threshold respectively are identified as “Low-income” and “Minority” areas.

Metrics examined in this section include on-time performance, out of service (meaning cancelled trips due to manpower shortages or equipment failures), crowding, service span, and service frequency. PRT’s Title VI policy defines an adverse impact as when a greater than 20 percentage point difference occurs between the two groups for income and for race/ethnicity for a service metric. For these analyses, any difference greater than 10 percentage points is deemed “at-risk” so that good faith efforts can be made to right these differences before they become “significant” at the 20-percentage point level. If at least a significant difference exists on any of these metrics, the bottom five scoring routes are listed as an area for improvement in FY23. Data for all metrics encompasses the entire FY22 period.

Summary of Title VI Findings by Income

Metric	Low Income Route	Non Low Income	Raw Difference	Pct. Difference	Direction of Difference
Number of Routes	43	57	N/A	N/A	N/A
Average On Time %	71.7%	71.7%	0.0%	0.0%	Equal
Average Out of Service %	3.0%	3.2%	-0.2%	-5.24%	Favorable
Average Crowding %	0.9%	0.2%	0.7%	429%	Adverse,
Average Service Span - Weekday	18	17	1.5	8.75%	Favorable
Average Service Span - Saturday	18	17	0.6	3.22%	Favorable
Average Service Span - Sunday (Hours)	15	15	0.3	2.12%	Favorable
Average Trips per Service Hour	1.6	1.4	0.1	9.69%	Favorable
Average Trips per Service Hour	1.6	1.5	0.1	6.66%	Favorable
Average Trips per Service Hour	1.6	1.5	0.1	6.69%	Favorable

Low-Income Routes: Service Reliability and Quality

On-time performance was equal between low-income and non-low-income routes in FY22. No adverse impact was found.

In FY2022, the percentage of trips crowded in low-income and non-low-income routes were 0.9% and 0.2% respectively, meaning there was a major adverse difference between them. The 10 low-income routes with the highest crowding are listed below. All these routes are Local routes that travel through Oakland which have high student ridership and congestion. This corridor will have construction on the Downtown-Uptown-Oakland Bus Rapid Transit Project (“Bus Rapid Transit Project” or BRT Project) in 2023, which will positively impact reliability along several key routes in the corridor and will indirectly benefit other Oakland routes. PRT is monitoring and looking at assigning articulated vehicles on crowded trips to mitigate adverse impact on low-income customers.

Route	Route Type	Percent of Trips Crowded	Actions in 2023	Route	Route Type	Percent of Trips Crowded	Actions in 2023
71B	Local	4.90%	Direct BRT Project	75	Local	2.35%	Indirect BRT Project
61C	Local	4.35%	Direct BRT Project	71D	Local	2.33%	Indirect BRT Project
61D	Local	3.91%	Indirect BRT Project	61B	Local	2.00%	Direct BRT Project
71C	Local	3.62%	Indirect BRT Project	61A	Local	1.76%	Direct BRT Project
71A	Local	3.01%	Indirect BRT Project	54	Local	1.30%	Indirect BRT Project

TITLE VI EVALUATION

Summary of Title VI Findings by Race

Metric	Minority Route	Non Minority Route	Raw Difference	Pct. Difference	Direction of Difference
Number of Routes	46	54	N/A	N/A	N/A
Average On Time %	71.2%	72.2%	-1.1%	-1.5%	Adverse, Minor
Average Out of Service %	3.0%	3.2%	-0.1%	-4.7%	Favorable
Average Crowding %	0.8%	0.2%	0.6%	359%	Adverse, Major
Average Service Span - Weekday	18	17	0.7	4.1%	Favorable
Average Service Span - Saturday (Hours)	18	17	0.3	1.9%	Favorable
Average Service Span - Sunday (Hours)	16	15	0.9	5.9%	Favorable
Average Trips per Service Hour	1.6	1.4	0.2	11.2%	Favorable
Average Trips per Service Hour	1.6	1.4	0.2	11.7%	Favorable
Average Trips per Service Hour - Sunday	1.6	1.5	0.2	11.0%	Favorable

Minority Routes: Service Reliability and Quality

On-time performance showed minor adverse differences between minority and non-minority routes in FY22. Ten minority routes with the worst OTP are listed below. Eight of them travel through Oakland. High student ridership and congestion in Oakland contributed to the poor OTP on these routes. Both the P78 and 77 will have schedule adjustments implemented in early 2023 to improve OTP.

Route	Garage	Average OTP %	Route	Garage	Average OTP %
P78	East Liberty	53.22%	61C	West Mifflin	62.43%
71C	East Liberty	59.26%	61A	West Mifflin	62.69%
61B	West Mifflin	59.66%	71B	East Liberty	64.55%
67	East Liberty	60.81%	61D	West Mifflin	64.70%
77	East Liberty	61.83%	71D	East Liberty	64.91%

In FY2022, the percentage of trips crowded in minority and non-minority routes were 0.8% and 0.2% respectively, meaning there is a major adverse difference between them. The 10 minority routes with the highest amount of crowding are listed below. Each of these routes are Local routes and routes travelling through Oakland which have high student ridership and congestion. This corridor will have construction on the Downtown-Uptown-Oakland Bus Rapid Transit Project ("Bus Rapid Transit Project" or BRT Project) in 2023, which will positively impact reliability along several key routes in the corridor and will indirectly benefit other Oakland routes. PRT is monitoring and looking at assigning articulated vehicles on crowded trips to mitigate adverse impact on minority customers.

Route	Route Type	Percent of Trips Crowded	Actions in 2023	Route	Route Type	Percent of Trips Crowded	Actions in 2023
71B	Local	4.90%	Direct BRT Project	75	Local	2.35%	Indirect BRT Project
61C	Local	4.35%	Direct BRT Project	71D	Local	2.33%	Indirect BRT Project
61D	Local	3.91%	Indirect BRT Project	61B	Local	2.00%	Direct BRT Project
71C	Local	3.62%	Indirect BRT Project	61A	Local	1.76%	Direct BRT Project
71A	Local	3.01%	Indirect BRT Project	54	Local	1.30%	Indirect BRT Project

Appendix F – Board Minutes of Presentation of FY2022 Annual Service Report

Minutes are archived here on PRT’s website:



Planning & Stakeholder Relations Committee

January 19, 2023

Board Committee Members

John Tague, Jr., Chair – virtual
Ann Ogoreuc – in person
Stephanie Turman – virtual

Other Board Members

Jeffrey Letwin - virtual
Michele Zmijanac - virtual
Lori Mizgorski – virtual
Gerry Delon – virtual
Jennifer Liptak – virtual

1. Approval of Minutes

The minutes of the November 10, 2022, Planning & Stakeholder Relations Committee were approved.

2. Presentation of the FY 2022 Annual Service Report (Section Manager of Service Development Ellie Newman)

The report evaluated PRT’s performance against previously set service standards, looking at ridership, overcrowding and on-time performance for the fiscal year between July 2021 and June 2022.

Ridership increased compared to FY21, with more than 32 million riders.

- Bus ridership increased 42%
- Light rail ridership increased 51%
- Incline ridership increased 67%
- Access paratransit ridership increased 27%.

Passengers per hour increased over 50% from FY21. Cost per rider decreased from FY21 peak, though still much higher than pre-pandemic.

Bus on-time performance showed small dips, to 71.4%, due to construction-related delays, increased ridership and traffic. Rail on-time performance dropped from 88.7% to 83.2%, mainly due to the Red Line detour that lasted for several months due to a bridge infrastructure issue.

PRT has increased coverage on service over the last 5 years, and all-day service now covers 59% of jobs and 48% of the population of Allegheny County.

Based on the service standards:

- 10 routes were out of compliance for frequency.
- 79 routes were out of compliance for on time performance.
- 97 routes were out of compliance for passengers per hour.

For FY23, on time performance continues to be a focus. Current standards are too high for post-pandemic realities, and new standards will be developed this spring to set a realistic minimum performance level for all routes.

During the Title VI evaluation it was found that minority routes and low-income routes are more likely to be crowded, which will be addressed with larger vehicles and added trips where feasible.

PRT also received a grant from the Route Restoration Planning Grant program of the Federal Transit Authority to study the transit routes post-pandemic and make adjustments to allow service to continue to be efficient, effective and equitable. That study should kick off in the summer of 2023.

3. Presentation of the February 19, 2023 Service Changes (Director of Transit Scheduling Phillip St. Pierre)

Following the updated collective bargaining agreement with Amalgamated Transit Union Local 85, PRT is changing from quarterly service changes to three service changes per year, which will be in February, June, and October.

For the February 19 service changes:

- 14 routes will see daily running time adjustments to improve on time performance and reliability (1, 6, 14, 28X, 31, 61A, 61B, 61C, 69, 77, 86, 87, 88, 93).
- 5 routes will see weekday running time adjustments (P10, P69, P76, P78, Y1).
- Weekday frequency changes are being made for two routes (1, 14).

Routing changes will be made to 6 routes:

- Due to the discontinuation of the lease agreement by the Century III Mall property owners, that park and ride location will no longer be operational. On Feb. 6 three routes (59, Y1, and Y46) will be adjusted to bypass the former park and ride at that location.
- Two routes (61A and 61B) will also return to original routing after being on an extended detour due to the closure of the Fern Hollow Bridge, which reopened to traffic in late-December.
- One route (P69) reversed a loop in Trafford to match other routing in the area.

Trip times will be adjusted for 16 routes (54, 58, 59, 61C, 61D, 64, 69, 77, 81, 83, 86, 87, 88, 91, 93, P78).

Several routes will also see the reduction of published timepoints for some paper and online schedules. While those stops may not appear on the schedules, this does not affect service and those stops continue to be in use.

4. Brief update on public comment period for BRT service changes (Chief Development Officer David Huffaker)

In November, the board authorized opening a public comment period for the proposed BRT major service changes, running from December 1 to February 1. An informational session was held in January to update the public on those changes and three public hearings were held with speakers addressing comments to PRT. To date, there have been well over 100 comments submitted through various means.

Once the public comment period is closed, a report will be drafted in February.

With no further business, the Planning & Stakeholder Relations Committee meeting was adjourned.

The next meeting is scheduled for Thursday, February 16, 2023, in the fifth floor Board Room at Pittsburgh Regional Transit offices.

Appendix G - Title VI Evaluation of Service Standards from FY2023 Annual Service Report

The link to the full FY2023 Annual Service Report, which is kept on PRT's website, is https://www.rideprt.org/siteassets/inside-the-pa/transparency/annual-service-report/01.08.24_final_asr_fy2023.pdf. Below are the Title VI Service Standard evaluation pages, extracted from the report.

PRT Annual Service Report 2023

TITLE VI EVALUATION

Routes are categorized as low-income or minority by whether their service areas have higher proportions of low-income and minority populations than the average of PRT's overall service area. In Allegheny County, percent of low-income population is 11.6% (American Community Survey 2019) and percent of minority populations is 25% (Census 2020). Any area with a low-income or minority population composition exceeding the 11.6% and 25% threshold respectively are identified as "Low-income" and "Minority" areas. This designation of low-income and minority areas and routes comes from the Triennial Title VI Program for PRT and is updated every three years.

Metrics examined include on-time performance, out of service (cancelled trips due to manpower shortages or equipment failures), crowding, service span, and service frequency. PRT's Title VI policy defines an adverse impact when a greater than 20 percentage point difference occurs between the two groups both for income and for race/ethnicity. For this analysis, any difference greater than 10 percentage points is deemed "at-risk" so that efforts can be made to right these differences before they become "significant" at the 20 percentage point level. If at least a significant difference exists on any of these metrics, the bottom five scoring routes are listed as an area for improvement in FY24. Data for all metrics encompasses the entire FY23 period.

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SUMMARY OF TITLE VI FINDINGS BY INCOME

Metric	Low Income Route	Non Low Income Route	Raw Difference	Pct. Difference	Direction of Difference
Number of Routes	41	55	N/A	N/A	N/A
Average On Time %	67.3%	70.3%	-3.0%	-4.3%	Adverse
Average Out of Service %	1.4%	1.51%	-0.1%	-9.8%	Favorable
Average Crowding %	1.4%	0.2%	1.2%	585%	Adverse, significant
Average Service Span - Weekday (Hours)	19	17	1.8	10.4%	Favorable
Average Service Span - Saturday (Hours)	16	12	4.3	36.7%	Favorable
Average Service Span - Sunday (Hours)	14	10	4.2	41.6%	Favorable
Average Trips per Service Hour - Weekday	1.5	1.4	0.1	6%	Favorable
Average Trips per Service Hour - Saturday	1.6	1.5	0.1	5.1%	Favorable
Average Trips per Service Hour - Sunday	1.6	1.5	0.1	3.8%	Favorable

LOW-INCOME ROUTES: SERVICE RELIABILITY AND QUALITY

On-time performance showed minor adverse differences between low-income and non-low-income routes in FY23. Ten low-income routes with the worst OTP are listed below. All routes, except the route 86, travel through Oakland. Traffic congestion, construction in Uptown and Downtown, and high student ridership contributed to the low OTP on these routes.

Route	Garage	AVG OTP	Route	Garage	AVG OTP
69	East Liberty	53.6%	71D	East Liberty	59.3%
61A	West Mifflin	55.5%	61B	West Mifflin	59.4%
71C	East Liberty	57.1%	93	West Mifflin	59.5%
61C	West Mifflin	57.2%	86	East Liberty	60.3%
61D	West Mifflin	58.3%	28X	East Liberty	60.5%

In FY23, there was a major adverse difference between low-income and non-low-income routes in terms of crowding. The ten low-income routes with the worst crowding are listed below and all these routes are local routes, except P1/P2 which is rapid. P1/P2 and P68 are the only routes listed that were not Oakland traversing routes. Reduced service levels, coupled with increased ridership on Oakland routes, contributed to almost all of this crowding in FY23.

Route	Route Type	Percent of Trips Crowded	Route	Route Type	Percent of Trips Crowded
61C	Local	7.9%	61A	Local	3.6%
61D	Local	6.7%	P68	Local	3.3%
71C	Local	5.6%	61B	Local	3.1%
71B	Local	4.9%	P1/P2	Rapid	3.1%
71A	Local	3.7%	75	Local	2.8%

SUMMARY OF TITLE VI FINDINGS BY RACE

Metric	Minority Route	Non Minority Route	Raw Difference	Pct. Difference	Direction of Difference
Number of Routes	44	52	N/A	N/A	N/A
Average On Time %	67.9%	69.9%	-2.0%	-2.9%	Adverse
Average Out of Service %	1.4%	1.5%	-0.2%	-10.8%	Favorable
Average Crowding %	1.3%	0.2%	1.2%	595%	Adverse, significant
Average Service Span - Weekday (Hours)	18	18	0.9	5.3%	Favorable
Average Service Span - Saturday (Hours)	14	13	1.5	11.3%	Favorable
Average Service Span - Sunday (Hours)	13	11	2.0	18.6%	Favorable
Average Trips per Service Hour - Weekday	1.5	1.4	0.1	4.5%	Favorable
Average Trips per Service Hour - Saturday	1.6	1.5	0.1	7.9%	Favorable
Average Trips per Service Hour - Sunday	1.6	1.5	0.1	5.7%	Favorable

MINORITY ROUTES: SERVICE RELIABILITY AND QUALITY

On-time performance showed minor adverse difference between minority and non-minority routes in FY23. Ten minority routes with the worst OTP are listed below. All of these routes, except for the P78 and 77 travel through Oakland. Traffic congestion, construction in Uptown and Downtown, and high student ridership contributed to the low OTP on these routes.

Route	Garage	Average OTP %	Route	Garage	Average OTP %
P78	East Liberty	51%	77	East Liberty	58%
69	East Liberty	54%	61D	West Mifflin	58%
61A	West Mifflin	55%	67	East Liberty	59%
71C	East Liberty	57%	71D	East Liberty	59%
61C	West Mifflin	57%	61B	West Mifflin	59%

In FY23, there was major adverse difference between minority and non-minority routes in terms of crowding. The ten minority routes with the worst crowding are listed below and all these routes are local routes, except P1/P2 which is rapid. P1/P2 and P68 are the only routes listed that were not Oakland traversing routes. Reduced service levels, coupled with increased ridership on Oakland routes, contributed to almost all of this crowding in FY23.

Route	Route Type	% of Trips Crowded	Route	Route Type	% of Trip Crowded
61C	Local	7.9%	61A	Local	3.6%
61D	Local	6.7%	P68	Local	3.3%
71C	Local	5.6%	61B	Local	3.1%
71B	Local	4.9%	P1/P2	Rapid	3.1%
71A	Local	3.7%	75	Local	2.8%

Appendix H - Board Minutes of Presentation of FY2023 Annual Service Report

Full minutes are archived here on PRT's website: <https://www.portauthority.org/siteassets/board/meeting-documents/2022/january2023psrcminutes.pdf> Below is a screenshot of the Title VI evaluation presentation minutes.



Planning & Stakeholder Relations Committee

January 18, 2024

Board Committee Members

John Tague – virtual
Ann Ogoreuc – in person
Stephanie Turman – virtual
Ali Doyle – virtual

Other Board Members

Jennifer Liptak - virtual
Michele Zmijanac - virtual
Lori Mizgorski – virtual
Joe Totten – virtual
Jeff Letwin – virtual

1. Approval of Minutes

The minutes of the November 9, 2023, Planning & Stakeholder Relations Committee were approved.

2. Presentation of FY2023 Annual Service Report (Ellie Newman)

The report evaluates performance against service standards, using ridership, crowding, on-time performance and out-of-service information as well as equity and Title VI analysis.

The report found that ridership for FY23 (July 2022 to June 2023) totaled 36.9 million.

Ridership:

- 16% increase for bus
- 48% increase for light rail
- 10% increase for paratransit
- 52% decrease for the incline due to being closed for half the year.

On-time performance:

- Bus on-time performance decreased from 71% to 67%.
- Rail on-time performance increased from 83% to 87%.

The service standards, which were updated to reflect the post-pandemic reality, showed that many routes were underperforming with frequency and on-time performance, and will be prioritized for adjustments in FY24.

Out-of-service numbers were shown to be improving since peaking during the pandemic.

According to the Title VI evaluation, minority routes and low-income routes were more likely to be crowded, which could be addressed with larger vehicles and adding trips where feasible.

For FY24, planned changes include the implementation of the NEXTransit Downtown routing study, continued progress on the PRTX University Line, and the Bus Line Redesign planning project.

3. Presentation of February 2024 Services Changes (Phillip St. Pierre)

February 18, 2024, service changes were presented.

The plan consists of minor service reductions of approximately 1.5%, which allows for additional operators to assist with covering service when operators are out and will stabilize service (based on projections) for the rest of 2024 and beyond as the organization turns the corner with operator hiring.

- Routing changes: 2, 12, 15, 26, 27, 29, 31, 60, 67, 69, 74, 89, G3, G31, P76, Y46
- Running time adjustments: 14, 54, 55, 64, 74, 81, 83, 86, 87, 88, 89, Y46
- Frequency changes: 31, 51L, 53L, 56, 59, 64, 67, 69, 81, 83, 86, 87, 88, 93, G2, P10, P12, P16, P76, P78, Y45, Y47, Y49 and the Red Line
- Variant changes: 28X, 67, P10, P16, Y47, Y49, Silver
- Span of service changes: P16, P67, Y1, Blue
- Trip Time adjustments: 28X, 55, 59, 65, 69, 71, 77, 81, 82, 93, P12, P12, P16, P67, P71

With no further business, the Planning & Stakeholder Relations Committee meeting was adjourned.

The next meeting is scheduled for Thursday, February 15, 2024, in the fifth floor Board Room at Pittsburgh Regional Transit offices.

Appendix I - Title VI Evaluation of Service Standards from FY2024 Annual Service Report

The link to the full FY2024 Annual Service Report, which is kept on PRT's website, is

www.rideprt.org/siteassets/board/meeting-documents/2025/feb/2.13.25_final_asr_fy2024.pdf. Below are the Title

VI Service Standard evaluation pages, extracted from the report.

PRT Annual Service Report 2024

TITLE VI EVALUATION

Routes are classified as low-income or minority based on whether their service areas have higher proportions of low-income and minority populations compared to the average across PRT's service area. In Allegheny County, 12.6% of the population is classified as low-income (according to the 2022 American Community Survey), and 24.6% of the population is minority (according to the 2022 American Community Survey). Areas with a low-income or minority population above these thresholds are designated as "Low-income" and "Minority" areas, respectively. These classifications are updated every three years as part of PRT's Triennial Title VI Program, and the methodology was updated in PRT's most recent submittal.

Metrics evaluated include on-time performance, out of service occurrences (due to manpower shortages or equipment failures), crowding, service span, and service frequency. PRT's Board-adopted Title VI policy defines an "adverse impact" as a difference of more than 20 percentage points between low-income and minority groups for any of these metrics. For this analysis, a difference greater than 10 percentage points is considered "at-risk," prompting efforts to address disparities before they reach the 20 percentage point threshold. If a significant disparity exists in any of these metrics, the bottom five routes will be flagged for improvement in FY 25.

SUMMARY OF TITLE VI FINDINGS BY INCOME

Metric	Low Income Route	Non Low Income Route	Raw Difference	Pct. Difference	Direction of Difference
Number of Routes	64	37	N/A	N/A	N/A
Average On Time %	67.1%	70.1%	-3.1%	-4.4%	Adverse, not significant
Average Out of Service %	1.5%	1.3%	+0.2%	+14.0%	Adverse, not significant
Average Crowding %	1.1%	0.2%	+0.9%	+446%	Adverse, significant
Average Service Span - Weekday (Hours)	18.0	15.8	+2.2	+14.0%	Favorable
Average Service Span - Saturday (Hours)	14.7	9.7	+5.0	+52.0%	Favorable
Average Service Span - Sunday (Hours)	13.3	7.8	+5.5	+71.0%	Favorable
Average Trips/Service Hour - Weekday	1.6	1.3	+0.3	+43.0%	Favorable
Average Trips/Service Hour - Saturday	1.5	1.2	+0.3	+26.0%	Favorable
Average Trips/Service Hour - Sunday	1.3	1.1	+0.2	+17.0%	Favorable

■ LOW-INCOME ROUTES: SERVICE RELIABILITY AND QUALITY

In FY 24, on-time performance showed slight adverse differences between low-income and non-low-income routes. The 10 routes with the worst on-time performance in the system are all low-income routes, including: 15 (45%), 61C (48%), 65 (50%), 77 (50%), 58 (52%), 71B (53%), 1 (55%), 69 (55%), 61A (55%), and P78 (55%). The causes of poor on-time performance vary by route, but include factors such as detours, construction, high student ridership, and traffic congestion.

A significant adverse difference in crowding was also observed between low-income and non-low-income routes in FY 24. All 10 routes with the highest crowding are classified as low-income routes. These routes are: 61C (8.9%), 71B (6.2%), 61D (6.2%), 61A (5.4%), 71A (4.9%), 71C (4.2%), 61B (3.6%), 75 (3.3%), 71D (2.3%), and P1 (2.3%). Although the routes with the highest crowding remain consistent with the previous year, changes in crowding have occurred due to significant service changes on some of these routes.

■ SUMMARY OF TITLE VI FINDINGS BY RACE

Metric	Minority Route	Non Minority Route	Raw Difference	Pct. Difference	Direction of Difference
Number of Routes	56	45	N/A	N/A	N/A
Average On Time %	65.8%	71.1%	-5.3%	-7.5%	Adverse, not significant
Average Out of Service %	1.5%	1.3%	+0.2%	+14.0%	Adverse, not significant
Average Crowding %	1.2%	0.2%	+1.0%	+621%	Adverse, significant
Average Service Span - Weekday (Hours)	18.0	16.2	+1.8	+11.0%	Favorable
Average Service Span - Saturday (Hours)	14.1	11.3	+2.7	+24.0%	Favorable
Average Service Span - Sunday (Hours)	12.8	9.4	+3.4	+26.0%	Favorable
Average Trips per Service Hour - Weekday	1.6	1.3	+0.3	+26.0%	Favorable
Average Trips per Service Hour - Saturday	1.5	1.2	+0.3	+17.0%	Favorable
Average Trips per Service Hour - Sunday	1.3	1.1	+0.2	+17.0%	Favorable

■ MINORITY ROUTES: SERVICE RELIABILITY AND QUALITY

In FY 24, on-time performance showed minor adverse differences between minority and non-minority routes. The 10 minority routes with the worst on-time performance were: 15 (45%), 61C (48%), 65 (50%), 77 (50%), 71B (53%), 69 (55%), 61A (55%), P78 (55%), 67 (56%), and 82 (56%).

As in FY 23, FY 24 data shows a significant adverse difference in crowding between minority and non-minority routes. All 10 routes with the highest levels of crowding are classified as minority routes. These routes include: 61C (8.9%), 71B (6.2%), 61D (6.2%), 61A (5.4%), 71A (4.9%), 71C (4.2%), 61B (3.6%), 75 (3.3%), 71D (2.3%), and P1 (2.3%).

Appendix J – Board Agenda of Presentation of FY2024 Annual Service Report

Minutes will be archived here on PRT’s website when they are finalized following the March 28th, 2025 Board Meeting: <https://www.rideprt.org/inside-Pittsburgh-Regional-Transit/Board/board-meeting-information/>

As a result of the timing of this report, the agenda for the February ASR presentation is included instead. This can be found at: <https://www.rideprt.org/siteassets/board/meeting-documents/2025/feb/february-2025-planning-and-stakeholder-relations-committee-agenda.pdf>



Pittsburgh Regional Transit

TO: Planning & Stakeholder Relations Committee
Thomas Burgunder
Ali Doyle
Bobbie Fan

FROM: Stephanie Turman, Chair

DATE: February 19, 2025

SUBJECT: Planning & Stakeholder Relations Committee – February 20, 2025

The next meeting of the Planning & Stakeholder Relations Committee is scheduled for Thursday, February 20, 2025, at 8:30 a.m. in the fifth-floor boardroom at Pittsburgh Regional Transit offices. The agenda is as follows:

1. Roll Call
2. Approval of Minutes of the January 23, 2025 Planning & Stakeholder Relations Committee
3. Presentation of the FY 2024 Annual Service Report (Amy Silbermann)
4. University Line BRT Project Quarterly Update (Amy Silbermann)
5. Adjourn

cc: Other PRT Board Members

Appendix K – Board Resolution Amending and Approving Title VI Program

SUMMARY OF RESOLUTION

Authorization to Adopt Pittsburgh Regional Transit's Title VI Program for 2025 to 2027

Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit (PRT) was organized and exists pursuant to the Second Class County Port Authority Act, as amended, to provide public transit services within and for Allegheny County. In accordance with Title VI of the Civil Rights Act of 1964 and related regulations adopted by the Federal Transit Administration (FTA), PRT maintains a Title VI Program (Program) to ensure that individuals are protected from discrimination based upon race, color, and national origin in the provision of PRT's public transit services.

Pursuant to applicable FTA regulations, PRT reviews and updates Program on a triennial basis to ensure that Program remains in compliance with all Title VI requirements and to document the Title VI analyses conducted for any major service or fare changes occurring in the preceding three calendar years.

Over the past several months, as part of the triennial review effort, PRT's staff has made various updates and revisions to Program. Before PRT can submit Program to FTA for final review, Program must be reviewed, approved, and authorized for PRT's adoption by PRT's Board.

The attached resolution would approve and authorize the adoption of Program for the 2025 to 2027 period, subject to any further revisions or amendments deemed necessary by FTA or PRT.

3/28/25
S. Turman

RESOLUTION

WHEREAS, Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit (PRT) was organized and exists pursuant to the Second Class County Port Authority Act, as amended, to provide public transit services within and for Allegheny County; and

WHEREAS, PRT maintains a Title VI Program (Program) to ensure that individuals are protected from discrimination based upon race, color, and national origin in the provision of PRT's public transit services in accordance with Title VI of the Civil Rights Act of 1964 and related regulations adopted by the Federal Transit Administration (FTA); and

WHEREAS, pursuant to applicable FTA regulations, PRT reviews and updates Program on a triennial basis to ensure that Program remains in compliance with all Title VI requirements and to document the Title VI analyses conducted for any major service or fare changes occurring in the preceding three calendar years; and

WHEREAS, PRT's staff has made various updates and revisions to Program over the past several months as part of the triennial review effort; and

WHEREAS, before PRT can submit Program to FTA for final review, Program must be reviewed, approved, and authorized for PRT's adoption by PRT's Board.

WHEREAS, PRT staff recommends that the Board approve and authorize the adoption of revised Program to ensure that Program remains in Title VI compliance and that PRT maintains the ability to continue to receive federal transit funds in a timely manner; and

WHEREAS, upon due consideration, the Board concurs with staff's recommendation and finds Program attached to this resolution as Exhibit A to be acceptable in all material respects.

NOW, THEREFORE BE IT RESOLVED, that the Board hereby approves and authorizes the adoption by PRT of Program attached hereto as Exhibit A for the period 2025 to 2027.

FURTHER RESOLVED, that the chief executive officer, chief human resources officer, deputy chief human resources officer, chief development officer and/or chief legal officer, and their respective designees be, and hereby are, directed to take any and all actions necessary and proper to submit Program to FTA for review and otherwise implement Program.

FURTHER RESOLVED, that the chief executive officer, chief human resources officer, deputy chief human resources officer, chief development officer and/or chief legal officer, and their respective designees be, and hereby are, authorized to further revise or amend Program, in a form approved by PRT's legal counsel, to the extent that changes in the law and/or further FTA review of Program would require additional revisions or amendments to Program for the time period 2025 to 2027.

CERTIFICATION

I, the undersigned duly qualified Assistant Secretary of Port Authority of Allegheny County, certify that the attached is a true and correct copy of a resolution adopted at a legally convened meeting of the Board of Port Authority of Allegheny County D/B/A Pittsburgh Regional Transit held on March 28, 2025.

Diane Williamson

Assistant Secretary

March 31, 2025



(Seal)

Appendix L - Disparate Impact and Disproportionate Burden Analysis Policy for Major Service Changes or Fare Changes

PORT AUTHORITY OF ALLEGHENY COUNTY DISPARATE IMPACT AND DISPROPORTIONATE BURDEN ANALYSIS POLICY FOR MAJOR SERVICE CHANGES OR FARE CHANGES

PURPOSE

The Federal Transit Administration (FTA) requires that transit agencies assess whether a proposed “fare change” or “major service change” would have a “disparate impact” on “minority populations,” or “disproportionate burden” on “low-income populations,” under Title VI of the Civil Rights Act of 1964, Title 49 C.F.R. Section 21.5(b)(2) and (b)(7), and Appendix C to Title 49 C.F.R. part 21. Pursuant to FTA Circular 4702.1B, FTA requires fixed route public transit agencies to clearly establish, with input through a public engagement process, threshold definitions for measuring disparate impacts and disproportionate burdens.

This policy will be utilized by Port Authority of Allegheny County (Authority) for analysis of proposed fare changes and major service changes. It establishes threshold standards for evaluating the equity impacts and the distribution of benefits and burdens caused by any fare change or major service change. The Authority reserves the right to amend this policy to the extent required by future changes in the law and/or at the discretion of its Board.

DEFINITIONS

Adverse Effects

A transit provider is required to define and analyze adverse effects related to major changes in transit service. Adverse Effects may include Fare Changes, reductions in service (e.g., elimination of a route, shortlining a route, rerouting an existing route, increase in headways) or even additions to service, especially if they come at the expense of reductions in service on other routes. Transit providers are required to consider the degree of Adverse Effects, and analyze those effects, when planning service changes. The Authority will define and analyze Adverse Effects related to proposed Fare Changes or Major Service Changes. The Authority will measure the loss (the adverse impact), or the gain (benefit), among Minority Populations and nonminority populations and among Low-Income Populations and non-low-income populations when conducting a service equity analysis of a proposed Major Service Change, and among minority and overall users and among low-income and overall users when conducting a fare equity analysis for any Fare Changes.

Disparate Impact

FTA Circular 4702.1B defines disparate impact as 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 lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives, but with less disproportionate effects on the basis of race, color, or national origin.

Disparate Impact Threshold

The Disparate Impact Threshold is defined as the impact of any Major Service Change or Fare Change that results in a Minority Population bearing Adverse Effects which are 20 percent more than the Adverse Effects borne by the non-minority population.

Disproportionate Burden

FTA Circular 4702.1B defines disproportionate burden as a facially 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 practicable.

Disproportionate Burden Threshold

The Disproportionate Burden Threshold is defined as the impact of any Major Service Change or Fare Change that results in a Low-Income Population bearing Adverse Effects which are 20 percent more than the Adverse Effects borne by the non-low income population.

Fare Change

A Fare Change is defined as any increase or decrease of fares, whether applicable to the entire transit system, or on certain transit modes, or by fare payment type or fare media. The definition of Fare Change does not include instances where all passengers ride free, or to temporary fare reductions that are mitigating measures for other activities such as construction, or to promotional fare reductions, so long as the temporary fare reduction or promotional reduction does not last longer than six months. A Fare Change also does not include the introduction of new fare products or fare media where those new fare products or fare media are only being added to the Authority's existing fare products or fare media versus replacing existing fare products or fare media.

Low-Income Person/Population

FTA Circular 4702.1B defines low-income person as a person whose median household income is at or below the US Department of Health and Human Services poverty guidelines, and defines low-income population as any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed FTA program, policy, or activity.

Major Service Change

A Major Service Change is defined by the Authority as:

- addition or removal of a route;
- addition or removal of a service day for a route;
- service changes that constitute an addition or reduction of more than 30% of the weekly trips, service hours, or service miles on a given route; or
- adding or removing more than 2,500 annual hours of service on a given route.

Any service reduction necessitated by an emergency situation or construction activity expected to last less than one year in duration is excluded from the definition of a Major Service Change.

Minority Persons

FTA Circular 4702.1B defines minority persons to include the following five groups: 1) American Indian and Alaskan Native, 2) Asian, 3) Black or African-American, 4) Hispanic or Latino, and 5) Native Hawaiian and Other Pacific Islander.

Minority Population

FTA Circular 4702.1B defines a Minority Population as any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations who will be similarly affected by a proposed DOT program, policy, or activity.

DISPARATE IMPACT POLICY

The purpose of this policy is to establish protocols for determining whether a Major Service Change or Fare Change is borne disproportionately by Minority Populations. The Authority seeks to eliminate or minimize disparate impact upon a Minority Population as a result of a Major Service Change or Fare Change.

When a Major Service Change or Fare Change is proposed, the Authority will first define and analyze the Adverse Effects that may result from the proposed change. Upon identification of Adverse Effects, the Authority will prepare and submit a service equity analysis and/or fare equity analysis in accordance with the guidance set forth in FTA Circular 4702.1B as may be amended, for the purpose of determining whether the Major Service Change or Fare Change will have a

Disparate Impact on the Minority Population. The analysis requires, utilizing the Disparate Impact Threshold, a comparison of Adverse Effects resulting from a Major Service or Fare Change as between the Minority Population and the non-minority population.

Depending upon the nature of the Major Service Change or Fare Change, the Authority may elect to establish comparison populations based upon either ridership data or the population data of a service area. Justification for selection of a ridership data comparison or a service area population comparison must be documented. When utilizing population data of a service area, the choice of a dataset shall be the smallest geographic area that reasonably has access to a transit stop or station. The Authority will document the techniques and technologies utilized to collect the ridership or population data utilized for the service equity analysis.

The equity or fare equity analysis will compare the existing service or fare to proposed changes and calculate the absolute change as well as the percent change. Utilizing the Disparate Impact Threshold, a determination will be made as to whether the Major Service Change or Fare Change will result in Adverse Effects that are disproportionately borne by the Minority Population.

If the analysis concludes that Disparate Impact will occur as a result of a Major Service Change or Fare Change, the change may be implemented only if (1) there exists a substantial legitimate justification for the proposed service change; and (2) there exists no alternatives that would have a less Disparate Impact on the Minority Population that would still accomplish the Authority's legitimate program goals.

Should any proposed Major Service Change or Fare Change result in Disparate Impact, the Authority will consider modification of the proposed change to avoid, minimize or mitigate the Disparate Impact of such change. Once a modification has occurred to avoid, minimize or mitigate potential Disparate Impacts, the Authority will conduct an additional analysis to determine whether the modifications successfully corrected the potential Disparate Impact resulting from the changes. The Authority shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including available less discriminatory alternatives, and Senior Management and Board of the Authority shall be briefed as to the outcome of the service equity analysis and/or fare equity analysis.

DISPROPORTIONATE BURDEN POLICY

The purpose of this policy is to determine whether or not Low-Income Populations will bear a Disproportionate Burden of a Major Service Change or Fare Change. While Low-Income Populations are not a protected class under Title VI, the analysis established under this policy is recognized as valuable for planning purposes.

When a Major Service Change or Fare Change is proposed, the Authority will first define and analyze the Adverse Effects that may result from the proposed change. Upon identification of Adverse Effects, the Authority will prepare and submit a service equity analysis and/or fare equity

analysis in accordance with the guidance set forth in FTA Circular 4702.1B as may be amended, for the purpose of determining whether such planned changes will have a Disproportionate Burden on a Low-Income Population. The analysis, utilizing the Disproportionate Burden Threshold, requires a comparison of Adverse Effects resulting from a Major Service Change or Fare Change as between the Low Income Population and the non-low income population.

The equity or fare service analysis will compare the existing service or fare to proposed changes and calculate the absolute change as well as the percent change. Utilizing the Disproportionate Burden Threshold, a determination will be made as to whether the Major Service Change or Fare Change will result in Adverse Effects that are disproportionately borne by the Low-Income Population.

If the analysis concludes that Disproportionate Burden will occur as a result of a Major Service Change or Fare Change, the Authority will consider modification of the proposed change to avoid, minimize or mitigate Disproportionate Burden where practical, and the Authority should describe alternatives available to Low-Income Populations affected by the Major Service Change or Fare Change. The Authority shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including available less discriminatory alternatives, and Senior Management and Board of the Authority shall be briefed as to the outcome of the service equity analysis and/or fare equity analysis.

Adopted via Board Resolution: 11/20/2015

Amended via Board Resolution: 12/8/2017

Appendix M – Title VI Analysis and Summary of Public Comment Period Fare Equity Analyses of Proposed Fare Changes for January 1, 2022

See attached PDF for full document.

Appendix N – Board Minutes Approving Title VI Fare Equity Analyses of Proposed Fare Changes for January 1, 2022

See area on following page with box around it for pertinent information.

PORT AUTHORITY OF ALLEGHENY COUNTY MINUTES OF THE REGULAR BOARD MEETING FRIDAY JUNE 25, 2021

The Regular Meeting of the Board of Port Authority of Allegheny County was held on Friday, June 25, 2021, at 9:30 a.m., at the Authority's Administration Offices, 345 Sixth Avenue, Pittsburgh, Pennsylvania, 15222-2527, pursuant to due public notice given as required by law.

The following members were in attendance: Jeff Letwin, Chair and Michelle Zmijanac. The following members participated virtually: Senator Jim Brewster, Representative Austin Davis, Jennifer M. Liptak, Ann M. Ogoreuc, John L. Tague Jr., Stephanie Turman, Jessica Walls-Lavelle, Gerald Delon. Acting General Counsel, Sandy Garfinkel participated virtually.

The Chair called the June 25, 2021 Regular Meeting to order.

A recommendation was made for approval of the minutes of the May 28, 2021 Regular Meeting. A motion was made, seconded, and unanimously passed.

Mr. Letwin announced that public comment portion of the meeting will be held at this time as speakers have indicated that they will speak on matters the Board will be voting on later in the meeting.

There were two speakers addressing the Board. The first speaker was Mr. Jim Keener. Mr. Keener supported that Port Authority Board meetings remain accessible to the public in TEAMS. This will show transparency and allow the public to participate in the meeting without the burden of attending the meetings in person.

The next speaker, Mr. Rahul Amruthapuri, first agreed with Mr. Keener's remarks on transparency. Mr. Amruthapuri urged the Board to reconsider a fare relief program for low-income riders which would help stabilize and immediately boost ridership.

The full comments of the speakers were recorded and appear in the audio transcription of the meeting.

The Chair called on Ms. Katharine Kelleman for a report of the Chief Executive Officer.

Ms. Kelleman first asked for a moment of silence for the retired employees who passed away in May: Operators William Poloka Jr. and Paul Wendt, Building Repairperson Marilyn Young, Cleaning Supervisor Betty Rose, and Shifter Patricia Daye.

Ms. Kelleman stated that the Board will vote on the 2022 budget today, but since she has already talked a lot about finances this year, she wanted to talk a little about service.

She stated that the Coronavirus pandemic greatly impacted ridership. In the month after the initial wave, ridership dropped by 90 percent on rail and 75 percent on bus. To ensure that we could continue to provide reliable service, we reduced our service on our commuter routes and added service to local routes where we observed overcrowding.

[Pages 2 - 4 omitted for not having Title VI pertinent information.]

Mr. Tague concluded his report by giving the Board an update on the Allegheny County Transit Council and Committee on Accessible Transportation.

ACTC met the prior night. At the meeting, the Planning Department staff provided an overview of our First Mile Last Mile Program and Government Relations staff provided updates on funding and a variety of other topics of interest. The Council also held their annual nominations for the ACTC Board of Directors. The elections will be held later this month and the results will be announced at the July Regular Board meeting. The next meeting will be July 28 on Microsoft Teams and there is no meeting scheduled in August.

The CAT Committee did not meet this month. The next quarterly meeting will be in August.

That concluded the report of the Planning and Stakeholder Relations Committee.

The Chair called on Ms. Ogoreuc for a report of the Finance Committee.

Ms. Ogoreuc reported that the Finance Committee met on Thursday, June 17 and she had a few items to report.

Ms. Ogoreuc presented a resolution seeking authorization to approve the Title VI Report for the Planned Fare Structure change. The Committee received a presentation on the Title VI Report that is a Federal Transit Administration requirement before any fare change can be adopted by the Board of Directors. Mr. Ogoreuc stated that the Title VI Report must measure the impact of any fare change on minority and low-income populations. It was reported that the proposed FY 2022 Fare Structure changes will not have a disparate impact on minority populations or a disproportionate burden on low-income populations.

On behalf of the Finance Committee, Ms. Ogoreuc respectfully requested approval of the resolution. It was moved, seconded, and unanimously agreed that the resolution be approved as presented.

Next at the meeting, Ms. Kelleman gave a summary of the various outreach steps the Authority had taken to gather public input on the fare structure changes. This outreach included three public hearings, a question-and-answer session, and public comment via website, phone, and mail.

Ms. Kelleman also emphasized that the Fare Structure change of creating a three-hour pass at \$2.75 by eliminating the \$1 transfer charge and 25 cent stored value discount and introducing seven-day and 31-day rolling passes will be the first step in a continuing process of improving fare payment through technology, improved accessibility, and long-term partnerships.

The Technology Committee agreed to recommend adoption and implementation of the FY 2022 Fare Structure Changes.

On behalf of the Finance Committee, Ms. Ogoreuc respectfully requested approval of the resolution. It was moved, seconded, and unanimously agreed that the resolution be approved as presented.

Ms. Ogoreuc presented the next resolution seeking authorization to appoint a successor Trustee for the Consolidated Pension Plan.

Appendix O – Title VI Analysis and Summary of Public Comment Period for Fare Changes for PRTner Pass Program Beginning January 1, 2025

See attached PDF for full document.

Appendix P – Board Minutes November 2024 Approving Title VI Fare Equity Analyses for Fare Changes for PRTner Pass Program Beginning January 1, 2025

See area on following page with box around it for pertinent information.

PITTSBURGH REGIONAL TRANSIT MINUTES OF THE REGULAR BOARD MEETING FRIDAY, NOVEMBER 22, 2024

The Regular Meeting of the Board of Pittsburgh Regional Transit (PRT) was held on Friday, November 22, 2024, at PRT's Administrative Offices, 345 Sixth Avenue, Pittsburgh, Pennsylvania, 15222-2527, pursuant to due public notice given as required by law.

The following Board members were in attendance in person: Jennifer Liptak, Chair, Tom Burgunder, Bobbie Fan, Joe Totten and Lori Mizgorski. The following members participated via TEAMS: Ali Doyle, Senator Brewster, Tia McClenney and Stephanie Turman. Board Solicitor Sandy Garfinkel attended in person.

The Chair called the Regular Meeting to order and asked the audience to stand for the pledge of allegiance followed by a silent moment of private reflection.

A recommendation was made for approval of the minutes of the October 25, 2024 Regular Meeting. A motion was made, seconded, and unanimously passed.

The Chair called on Pittsburgh Regional Transit CEO Katharine Kelleman for a report.

CEO Kelleman asked for a moment of silence for the following retired employees who passed away since the Board last met: Automotive Mechanic Joseph Santiso; Internal Auditor Jacqueline Elliott; Service Person Damian Chisco; and Operators Grover Bell, Carl Denson, Harold Jumper, Jr., Edward Franklin, Frank Moore, Constance Neiswonder, Andrew Rudge Jr., Joseph Schaffer, John Stromple and James Zehnacker.

Finally, CEO Kelleman offered her sincere condolences to the friends and family of active employee Collier Operator Joseph Phillips Jr., who drove a bus for nearly a decade. Operator Phillips passed away this month.

Next CEO Kelleman gave an update on rail service. "Back in 2023, we began a large, five-year, \$150 million push of capital investments in our rail system. As part of those projects, this past summer we shut down part of the Red Line to complete five or six separate projects in the time it would have taken us to complete two, maybe three if we had single tracked or tried to complete separately."

"We learned in the past that it is better for everyone when we plan and schedule a closure rather than performing emergency repairs in the middle of the night when something breaks." The CEO added that, for example, a connection on an overhead power line failed after about 40 years and it took down with it the Silver Line. PRT personnel were able to get most of the line back up within a couple days and the entire line back up in about a week, "but it certainly was not convenient for riders, and nobody wants to be out working on a catenary wire at 3 o'clock in the morning."

CEO Kelleman continued reporting that PRT started a project to replace a crossover in Bethel Park, and the delays were longer than anticipated. She noted that all this work is important, but she understands the frustrations and acknowledged that PRT riders deserve better and it does not make anyone look forward to PRT working on parts of the rail system for the better part of next year. There will be discussions with ATU about working more weekend hours, and CEO Kelleman said she was

[Pages 2 – 4 were omitted as they are not pertinent to the Title VI Program.]

The first resolution was to authorize approval of the Title VI Analysis for the proposed PRTner Pass Program. In compliance with the Civil Rights Act of 1964 and Port Authority of Allegheny County's Title VI Program, PRT engaged with its fare consultant to conduct a Title VI analysis. The results of that analysis were positive with no disparate impact and no disproportionate burden found.

On behalf of the Finance Committee, Member Doyle respectfully requested approval of the resolution. It was moved, seconded and unanimously agreed that the resolution be approved as presented.

The second resolution sought authorization to adopt and implement the proposed PRTner Pass Program. After a pilot was carried out in 2023, PRT conducted a public comment period with two informational sessions and a public hearing regarding the program. The comments received during the public comment period were generally favorable. The Program will offer a 70 percent discount for monthly passes to eligible employers, post-secondary schools, and multifamily properties. This resolution authorizes the adoption and implementation of the program effective January 1, 2025, or as soon as deemed feasible.

On behalf of the Finance Committee, Member Doyle respectfully requested approval of the resolution. It was moved, seconded and unanimously agreed that the resolution be approved as presented.

The third resolution sought authorization to appoint a Recordkeeper for PRT's Defined Contribution Program. PRT convened an Evaluation Committee and authorized that the Committee, in conjunction with the board-appointed Chief Investment Officer, to evaluate seven responsive proposals to an advertised RFP. That Committee determined Empower Retirement Services to be the highest rated proposer. With approval of this resolution, PRT would be authorized to enter into an agreement with Empower Retirement Services as Recordkeeper for the existing Defined Contribution Program.

On behalf of the Finance Committee, Member Doyle respectfully requested approval of the resolution. It was moved, seconded and unanimously agreed that the resolution be approved as presented.

The final resolution sought authorization for PRT to adopt an amended and restated Money Purchase Pension Plan Document. PRT, through authorized Pension Committee members, has adopted certain administrative rules and changes to the Money Purchase Pension Plan. These changes were documented as plan amendments. This resolution would allow PRT to amend and restate the Money Purchase Pension Plan to incorporate all provisions and changes into a single document.

On behalf of the Finance Committee, Member Doyle respectfully requested approval of the resolution. It was moved, seconded and unanimously agreed that the resolution be approved as presented.

Next, member Doyle presented the October 2024 financial report. It was reported that Total Operating Income for October was over budget about \$200,000 due to increased Passenger Revenue and Interest Income. Total Expenses for October were below budget by \$1.7 million due to lower Wages and Salaries and Purchased Services. Total Subsidies for October were over budget by \$700,000 due to increased state operating assistance.

Total Operating Income through October is \$1 million higher than last fiscal year due to increased Fare Revenue and ACCESS Income. Total Expenses through October were \$9.6 million higher than last fiscal year due to higher Wages & Benefits, and Materials & Supplies.

Appendix Q – Title VI Analysis for Fall 2023 Major Service Reductions
PLACEHOLDER – SEE PDF ATTACHMENT

Appendix R - Summary of Public Comment Period for Fall 2023 Major Service Reductions
PLACEHOLDER – SEE PDF ATTACHMENT

Appendix S – Board Minutes Adopting Title VI Service Equity Analyses and Public Comment Period for Fall 2023 Major Service Reductions

PITTSBURGH REGIONAL TRANSIT MINUTES OF THE REGULAR BOARD MEETING FRIDAY, MARCH 24, 2023

The Regular Meeting of the Board of Pittsburgh Regional Transit (PRT) was held on Friday, March 24, 2023, at 9:30 a.m. at PRT's Administration Offices, 345 Sixth Avenue, Pittsburgh, Pennsylvania, 15222-2527, pursuant to due public notice given as required by law.

The following members were in attendance in person: Jeffrey Letwin, Chair, Ann Ogoreuc, Michelle Zmijanac, John Tague, Stephanie Turman, Lori Mizgorski and Senator Jim Brewster. The following members were in attendance virtually: Jennifer Liptak, Gerry Delon, Ali Doyle and Representative Nick Pisciotto. Board Solicitor Sandy Garfinkel attended in person.

The Chair called the March 24, 2023 Regular Meeting to order and asked the audience to stand for the Pledge of Allegiance and for a moment of silence for victims of gun violence.

A recommendation was made for approval of the minutes of the February 24, 2023 Regular Meeting. A motion was made, seconded, and unanimously passed.

Mr. Letwin called on Pittsburgh Regional Transit CEO Katharine Kelleman for a report.

Ms. Kelleman first asked for a moment of silence for the for the following active and retired PRT employees who passed away since we last met: Operators Leslie Rainey and Alexander Harrilla; Body Repairperson Joseph Lardin; Material Delivery person William Morrison; Transit Information Supervisor Jeanne Lake; Machinist Norbert Bauer; Operations Manager Pasquale Vennare; and Route Foreman Lamar Rogers.

Ms. Kelleman reported that the Board will consider the first phase of construction contract for the Downtown-Uptown-Oakland Bus Rapid Transit project. This includes Fifth, Liberty and Sixth Avenues in Downtown Pittsburgh that is referred to as a "Downtown Loop." Ms. Kelleman noted that long before she came to Pittsburgh, planners and engineers had spent years working to find a solution to improve transit service between Downtown and Oakland, the second and third largest economic centers in Pennsylvania. Ms. Kelleman was happy to report that this contract gets those years of hard work one step closer to making this a reality. "Soon we anticipate executing federal funding agreement with the FTA and anticipate construction starting in the fall."

Ms. Kelleman continued reporting that "Our hope is that the upgrades and service improvements not only improve transit reliability and speed but improves safety for everyone and be a catalyst for investment, spurring development in a corridor that has so much promise."

Ms. Kelleman stated that the BRT project will not only impact service in the corridor it directly serves but will reverberate across PRT's network in Downtown Pittsburgh, where 84 bus routes travel more than 25 different loops to get in and out of Downtown. "We've already begun public outreach to improve and hopefully simplify our system to reduce walking, improve connectivity, and align routes to use the same corridors."

She continued that PRT expects to present a proposal to the public for review in May. "This is important work that will impact a large majority of our riders. The BRT will also create operational efficiencies and will help us save nearly 500 hours of service every week. That's 100 hours on

use of additional American Rescue Plan Act funding. The resolution will increase the FY 2023 Total Operating Budget from \$518,974,705 to \$525,779,342 as contained in Exhibit "A."

It was also reported at the meeting that since the adoption of the original FY 2023 Capital Budget, PRT has been notified it will be receiving additional Federal funding for the Downtown-Uptown-Oakland Bus Rapid Transit project. This additional Federal funding will permit previously budgeted Commonwealth funding to be re-purposed toward additional Capital projects. The amended Capital Budget is detailed in Exhibit "B" to the resolution and increases the budget from \$232,865,463 to \$282,915,462.

The Finance Committee recommended PRT adopt the amended FY 2023 Operating and Capital Budgets.

On behalf of the Finance Committee, Ms. Ogoreuc respectfully requested approval of the resolution. It was moved, seconded and unanimously agreed that the resolution be approved as presented.

The February financial results were also presented at last week's meeting.

It was reported that Total Operating Income for the month exceeded budget by \$892,439 due to higher Passenger Revenue and Interest Income. Passenger Revenues were higher due to Ticket Sales, Monthly Pass Sales and U-PASS sales exceeding budget for the month. For the fiscal year, Total Operating Income is \$1.5 million below budget due to lower Passenger Revenue and ACCESS Shared Ride Revenue which is partially offset by higher Interest Income.

February Total Expenses were below budget for the month by \$3.9 million. The category of Other Expense exceeded budget due to higher General Insurance and Building Lease Expense. All other expense categories were below budget for the month.

Total Expenses for the fiscal year are \$34 million below budget primarily due to lower Salary and Wages and Employee Benefits related to vacant positions as well as lower Purchased Services.

Total Subsidy for the month of February was \$618,774 below budget due to lower Vehicle Overhaul receipts and lower State Operating Assistance for ACCESS.

Total Subsidy through February is \$4.2 million below budget due to lower ARPA invoicing. An ARPA invoice of \$10.4 million was submitted in March which should bring Total Subsidy in line with budget. Finally, it was reported that PRT ended the month of February with approximately \$169.2 million in cash reserves.

That concluded the report of the Finance Committee.

The Chairman called on Mr. Tague for a report of the Stakeholder Relations Committee.

Mr. Tague reported that the Planning and Stakeholder Relations Committee met last week and had a few items to report, including a resolution.

First, the Committee received a summary of the public comment period for the BRT project proposed service changes for 2023-2025. It was reported that the public comment period was held between December 2022 and February 2023, after being approved by the Board to proceed in November.

During that time, public comment was solicited through several avenues including public hearings, online, by phone, and by mail, among others. While a majority of the comments were favorable, a large number of negative comments were received regarding the potential changes on the P3 route. The proposed changes include extending service downtown via the BRT corridor while stopping the route in Wilksburg rather than in Swissvale. Staff recommends that the changes to the P3 route be deferred until further analysis and outreach can be conducted.

Mr. Tague continued reporting that staff is recommending the Board approve four major service changes, including the 61D, 71A, 71C and 71D routes. Details of these changes can be found in the Title VI Report.

If approved by the Board, these changes would not occur until at least the fall 2023 service change in October and would help facilitate the BRT construction and preview improvements of the project. Construction is expected to begin in the Downtown portion of the project in spring of 2023. Construction of the Uptown-Oakland corridor is expected to begin in spring of 2024.

Mr. Tague then presented a resolution requesting the authorization to approve the BRT major service changes and associated Title VI Report.

This resolution would adopt PRT staff's proposal for the major service changes summarized in Exhibit "A" to the resolution and adopt the Title VI Report concerning those service changes.

Pursuant to applicable FTA regulations, PRT is required to conduct an analysis prior to implementing any major service changes to determine whether any such major service changes would have a disparate impact on PRT's ridership based on race, color, or national origin, and if so, the means by which to mitigate such impact. PRT is also required to conduct an analysis prior to implementing any major service changes to determine whether any such major service changes would disproportionately burden low-income populations, and if so, means by which to mitigate such impact.

PRT conducted the foregoing analyses, held public hearings and formulated a Title VI Report, the conclusions of which were presented to the Committee and detailed in Exhibit "B" to the resolution. The Planning and Stakeholder Relations Committee recommends that the Board approve the BRT project major service changes and adopt the Title VI Report.

On behalf of the Planning and Stakeholder Relations Committee, Mr. Tague respectfully requested approval of the resolution. It was moved, seconded and unanimously agreed that the resolution be approved as presented.

Mr. Tague then gave a brief update on the Allegheny County Transit Council and the Committee on Accessible Transportation. He reported that ACTC met on March 22. Staff provided the Council with an overview of PRT park and rides, and an update on the NexTransit downtown project. Their next scheduled meeting is April 26.

The CAT Committee did not meet in March. Their next scheduled meeting is May 4.

That concluded the report of the Planning and Stakeholder Relations Committee,

Because Committee Chair Jennifer Liptak was attending the meeting remotely, the Board Chair called on Ms. Mizgorski for a report of the Technology Committee for a report.

Appendix T – Title VI Analysis for Route 17 Major Service Addition Fall 2023

EXHIBIT “A”

Major Service Changes Title VI Service Equity Analyses

For Proposed October 2023 Route Changes for P17 Lincoln Flyer

Planning & Service Development Department

Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit (PRT)

Final as of July 2023 (Subject to PRT Board Approval)

Purpose and Definitions of Title VI

Title VI is a Federal statute and provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The program mandates transit agencies evaluate, prior to implementation, all service changes that exceed the transit provider's major service change threshold (30% service hours per PRT's policy), and to determine whether those changes will have a discriminatory impact based on race, color, or national origin. Even though low-income populations are not a protected class under Title VI, the Federal Transit Administration (FTA) also requires transit providers evaluate proposed service changes to determine whether low-income populations will bear a disproportionate burden of the changes.

Minority persons include American Indian and Alaska Natives, Asian persons, Black or African Americans, Hispanic or Latino persons, and Native Hawaiian or other Pacific Islanders. The minority race and ethnicity data used in the analysis is from the American Community Survey (ACS) 2018 dataset from the U.S. Census.

A low-income household is defined as a household whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. The data for persons under poverty used in the analysis is from the American Community Survey (ACS) 2018 dataset from the U.S. Census.

Major Service Changes – Service Impact Analyses

Disparate Impact Analyses for Major Service Changes FY2024

In October 2023, Pittsburgh Regional Transit plans to implement one major service change as defined by the agency as affecting more than 30% of a route's weekly trips, directional miles or service hours. The change is described below:

Route	Change Category	Title VI Results	Weekly Hours Before Changes	Weekly Hours After Changes	Percent Change	Type
Route P17	Addition of route miles and hours	Positive results	10.15	21.0167	+107%	Major

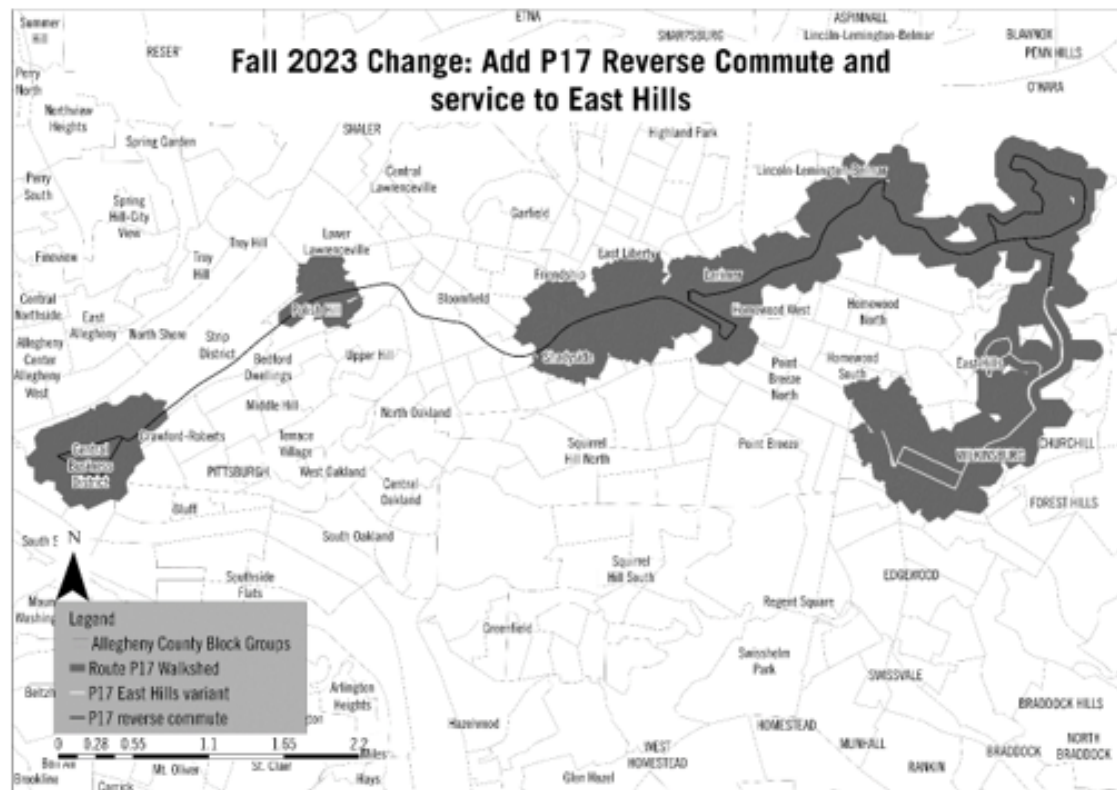
Route P17 Reverse Commute Added

Description

PRT plans to provide route P17 Lincoln Park Flyer with reverse commute service, which will follow the same route as the current weekday commute service. The new P17 service will also include a variant that will extend service to Wilkinsburg Station via East Hills during AM and PM peak. This will give East Hills (route 79) riders a one-seat ride to and from Downtown instead of having to transfer at Wilkinsburg Station. The addition of more than double of the current route hours exceeds the 30% change threshold and is considered major.

Demographics of Population within Major Service Change Area

Walksheds were developed to be able to geographically constrain the service area before and after the change. The walkshed is defined as $\frac{1}{4}$ mile on street areas around each bus stop serving the route after the new service provision.



The map shows the new service area for route P17. The demographic analysis selects Census blocks of centroids within the walkshed and finds the percent of minority race and low-income populations within the service area.

Route	Minority Population in Major Service Change Area Census Tracts	Allegheny County Minority Population	Percent Change from Service Area	Exceeds Disparate Impact Threshold of +20%	Low Income Population in Major Service Change Area Census Tracts	Allegheny County Low Income Population	Percent Change from Service Area	Exceeds Disproportionate Burden Threshold of +20%
P17	11,003/21,514 = 51.14%	30.80%	66%	Yes, but positive change	5,212/21,288 = 24.48%	18.60%	32%	Yes, but positive change

As seen in the chart, the block groups served by Route P17 have higher proportions of minority race populations and low-income populations than the service area at large. However, this is a proposed service addition and a positive change, so there would be no disparate impact or disproportionate burden on these populations.

Appendix U – Board Minutes Adopting Title VI Service Equity Analysis for Route 17 Major Service Addition Fall 2023

PITTSBURGH REGIONAL TRANSIT MINUTES OF THE REGULAR BOARD MEETING FRIDAY, SEPTEMBER 29, 2023

The Regular Meeting of the Board of Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit (PRT) was held on Friday, September 29, 2023, at 9:30 a.m. at PRT's Administration Offices, 345 Sixth Avenue, Pittsburgh, Pennsylvania, 15222-2527, pursuant to due public notice given as required by law.

The following members were in attendance in person: Jeffrey Letwin, Chair, Jennifer Liptak, John Tague; Lori Mizgorski, Ann Ogoreuc, Stephanie Turman and Joseph Totten. The following members were in attendance virtually: Senator Jim Brewster, Representative Nick Pisciotto, Ali Doyle and Michelle Zmijanac. Board Solicitor Sandy Garfinkel attended in person.

Before calling the meeting to order, the Chair noted that the ALS interpreter in attendance at the meeting was provided in response to a specific request for accommodation.

The Chair called the September 29, 2023 Regular Meeting to order and asked the audience to stand for the Pledge of Allegiance and for a moment of silence for those affected by gun violence.

A recommendation was made for approval of the minutes of the July 28, 2023 Regular Meeting. A motion was made, seconded, and unanimously passed.

Mr. Letwin called on Pittsburgh Regional Transit CEO Katharine Kelleman for a report.

Ms. Kelleman first asked for a moment of silence for the following active and retired employees who passed away since we last met:

Operators John Hay, Earl Rogers, Eileen Morris, Kevin Flannery, and Ronald Trbovich; Road Operations Supervisor Frank Ganazzo; Garage Foreman Timothy Petrak; Electronic Maintainer Carl Wurm; Auto Mechanic Carlo Giovannini; Manager of Real Estate Arthur Hussey; Serviceperson James Dandridge; and Janitor Charles Dixon.

Next, Ms. Kelleman recognized 17 operators who received the most commendations in 2021 and 2022. She stated that the operators here today represent the best of us; they're empathetic, caring, kind, and patient. "So many of our employees do an amazing job, and it's a privilege to be able to recognize them publicly." She called the following operators up to receive a certification of appreciation.

From the Ross Division: Kevin Joa, Carlyle Stokes, James Bonner, Omar Ingram, William Scott, Suzanne Scanlon, Billie Jo Stephans, and William Vallecorsa. From the Collier Division: Amy Jackson and Todd Cardillo; from the West Mifflin Division: Steven Ehrin, Amanda Dalton, and Mark Prunty; from The East Liberty Division: Adam Jackson, Monica Lampkin, and Leslie Johnson; and from South Hills Village: Gerald Greer.

Ms. Kelleman congratulated the operators and thanked them for their service. She commented that, while they may make it look easy, what they do is not.

Mr. Tague reported that the Planning and Stakeholder Relations Committee met the prior week and he had a few items for the Board.

First, staff presented a recap of the October 2023 BRT Major Service Changes. It was reported that in advance of the BRT Project construction Downtown and Uptown, beginning October 1, Routes 61D, 71A, 71C, 71D will terminate at the western end of Oakland and no longer serve Uptown and Downtown Pittsburgh. Those routes will now be designated with the "short" head signs. Staff will be in the field to assist riders with information through October 5 along with print, audio, and online messaging designed to assist riders.

A public information session was held on September 12, and concerns regarding transfers were identified. According to the Title VI analysis, 97.7 percent of riders of these routes are directly served by a downtown-bound, one-seat ride at their same bus stop, while 99 percent of riders still have a one-seat ride within a five-minute walk. Three percent of riders were identified as paying fares via cash. It was reported that public meetings on these changes began in 2017 and continued into 2018, and a formal public comment period began November 2022, which received about 700 responses, overwhelmingly opposing changes to the P3 route, which PRT has deferred a decision on while additional analysis is completed.

The board adopted these service changes, except the P3, in March 2023.

Next Mr. Tague gave an update on the Allegheny County Transit Council and Committee for Accessible Transportation. ACTC met on September 27. At the meeting, staff presented the Title VI report for the P17 service changes. President Ralph Williams presented proposed Code of Conduct Bylaw amendments. The next scheduled meeting is October 25.

The CAT Committee did not meet in September. The next scheduled meeting is November 2.

There is one resolution that Mr. Tague intended to present for the Board's consideration after public comment has concluded. Ms. Kelleman at this time explained that the resolution that Mr. Tague will be presenting seeks approval of the Title VI Analysis for October 2023 Major Service Change to Route P17 Lincoln Flyer does not pertain to the BRT service changes. She explained that the Board will not be voting at this meeting on the changes beginning October 1 on routes 61D, 71A, 71C, 71D.

That concluded the report of the Planning and Stakeholder Relations Committee.

The Chair called on Ms. Ann Ogoreuc for a report of the Finance Committee.

Ms. Ogoreuc reported that the Finance Committee met the prior week and she had one resolution for consideration which authorizes PRT to enter into an agreement for Chief Investment Officer Services.

It was reported that in July 2023, an RFP was issued to obtain a contractor to provide oversight of the Defined Benefit Consolidated Pension Plan, Deferred Compensation Plan and Money Purchased Plan. Ms. Ogoreuc noted that the Consolidated Pension Plan is a closed pension plan representing the Non-Represented IBEW and Police active employees and retirees.

Under public comment, there were nearly 30 people who addressed the board about the time and financial costs of requiring people to transfer buses to get to their final destination. These changes will take effect Oct. 1 and riders who want to continue Downtown along the 61D, 71A, 71C, and 71D routes will instead have to transfer beginning on Sunday. The route they traveled will become the BRT route from Downtown through Uptown to Oakland and beyond. Construction of the BRT began earlier this month.

Some speakers stressed the cuts will reduce direct access to employment centers like Mercy Hospital and Duquesne University, as well as the city's East End. That part of the city includes Shadyside, which multiple speakers mentioned for its many grocery stores and the Hillman Cancer Center, as well as Highland Park, Homewood, Larimer, and Wilkinsburg. Mr. Nicotero, President of ATU, Local 85, said that PRT is alienating whole communities by eliminating bus service just as Allegheny County tries to emerge from the pandemic. Some speakers also stressed the added burden this will cause on our disabled community.

Ms. Kathleen Lynch who works at Duquesne University, stated that students have university bus passes which helps students and faculty get discounted bus fare, but they will now have to pay for transfers. There are a lot of Duquesne University students who use the 71 buses who are now going to have to transfer and walk further although the route used to be a direct route.

The speakers who made the foregoing comments collectively included: Amy Zaiss; Bernadette Mosey; Kathleen Lynch; Alisa Grishman; James Larsen; Ross Nicotero; Lorita Gillespie; Joy Dore; Deb Goycochea; Verna Johnson; Mel Packer; Gina Anderson; Gabriel McMorland; Fred Mergner; Laura Chu-Wiens; Seth Bush; Morgan Cikowski; Nicole Gallagher; Morgan Boyer; Andrew Hussein; Bridget Hughes; Karen Smith; and Lynda VanBueren.

There were also a few speakers who spoke about other issues like Mr. Ramesh Bhambwani who requested a bus stop shelter at Cedar Blvd. in Mt Lebanon and bathroom facilities at Gateway Center. Ms. Laura Perkins, Human Rights Organizer at Casa San Jose, requested better printed and audible signage on the Red Line where there is a lot of Spanish speaking patrons. Ms. Perkins also volunteered her voice in Spanish to record the messages on the T. Mr. Ralph Williams, President of ACTC, thanked the Board for lifting the vaccine mandate and bringing back the experience drivers. And finally, Mr. Joe Janosik, Bethel Park Councilman, addressed the Board on the future of the Silver Line. Councilman Janosik said that he was there today to stay informed and as an observer and looked forward to developing a partnership with PRT*.

After the close of Public Comment, the Chair called on Mr. Tague for presentation of the resolution requesting the approval of the Title VI Analysis for October 2023 Major Service Change to Route P17 Lincoln Flyer. This resolution would adopt the report and authorize PRT staff to proceed with implementation of the P17 major service changes in October, which include a reverse commute service following the same route as the current weekday commute service, as well as a new variant that will extend to Wilkinsburg Station via East Hills during AM and PM peak. This will give East Hills (Route 79) riders a direct ride to and from Downtown.

The Title VI analysis found the changes to be positive with no adverse impacts to low-income or minority populations.

On behalf of the Planning and Stakeholder Relations Committee, Mr. Tague respectfully requested approval of the resolution. It was moved, seconded and unanimously agreed that the resolution be approved as presented.

The Chair announced the next Regular meeting of the Board will be Friday, October 27, 2023.

With no further business the meeting was adjourned.

*Full testimonies can be found on PRT's website at www.ridePRT.org.

Appendix V – List of All Title VI Complaints Received January 1, 2022, and December 31, 2024

Complaint Number	Date	Summary of Allegation	Status	Action Taken	Discrimination Description
84513	5/9/2022	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
NWEB266738	5/10/2022	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
NWEB267161	5/18/2022	Operator Discourtesy	Closed	Operator counseled by management	Race/National Origin
85233	5/24/2022	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
NWEB267670	5/26/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB267667	5/26/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB268042	6/2/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB268546	6/3/2022	Operator Discourtesy	Closed	Operator counseled by management	National Origin
85856	6/7/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
86081	6/11/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB269056	6/12/2022	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
86170	6/13/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
86277	6/15/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
86562	6/21/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
86651	6/22/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
86739	6/24/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
86830	6/26/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB270756	7/11/2022	Operator Discourtesy	Closed	Operator counseled by management	Race

88060	7/20/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
88072	7/20/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
88951	8/6/2022	Operator Discourtesy	Closed	Operator counseled by management	National Origin
NWEB272503	8/9/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
89524	8/18/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
89854	8/25/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB273720	8/28/2022	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
90928	9/14/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
91132	9/18/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB274789	9/26/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
91575	9/27/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB275054	10/5/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
92610	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
92881	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
93045	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB276387	11/1/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB277075	11/8/2022	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
NWEB277287	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
94186	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
94679	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
94695	#####	Operator Discourtesy	Closed	Operator counseled by management	Race

NWEB284962	12/6/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB285235	12/7/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
94984	12/7/2022	Operator Discourtesy	Closed	Operator counseled by management	National Origin
NWEB285327	12/8/2022	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB285404	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
95276	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
96164	1/6/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
96511	1/16/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB288358	1/27/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
97043	1/28/2023	Operator Discourtesy	Closed	Operator counseled by management	Race/National Origin
NWEB288782	2/1/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
97259	2/2/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
97673	2/12/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB289782	2/24/2023	Operator Discourtesy	Closed	Operator counseled by management	National Origin
98425	3/1/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
99047	3/14/2023	Operator Discourtesy	Closed	Operator counseled by management	Color/National Origin
99020	3/14/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB290733	3/21/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
99561	3/25/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
99727	3/29/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
99893	4/1/2023	Operator Discourtesy	Closed	Operator counseled by management	Race

NWEB291303	4/2/2023	Operator Discourtesy	Closed	Operator counseled by management	National Origin
100050	4/5/2023	Operator Discourtesy	Closed	Operator counseled by management	Color
100427	4/13/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB292054	4/16/2023	Operator Discourtesy	Closed	Operator counseled by management	Color
101020	4/26/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
101073	4/27/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB292813	5/1/2023	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
101321	5/3/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
101494	5/6/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
101490	5/6/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
101519	5/7/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
101626	5/9/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB294454	5/28/2023	Operator Discourtesy	Closed	Operator counseled by management	National Origin
NWEB294458	5/29/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
102895	6/5/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB295250	6/13/2023	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
103571	6/19/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
103618	6/20/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
104563	7/10/2023	Operator Discourtesy	Closed	Operator counseled by management	National Origin
104609	7/11/2023	Operator Discourtesy	Closed	Operator counseled by management	Race/National Origin
104751	7/13/2023	Operator Discourtesy	Closed	Operator counseled by management	Race

105196	7/21/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB297680	7/31/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB297681	7/31/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
106112	8/8/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
106539	8/16/2023	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
NWEB299612	8/27/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
107522	9/1/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
108601	9/22/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
108794	9/26/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
108851	9/27/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
109425	10/5/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB302293	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
110388	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
110645	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
110708	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
110842	#####	Operator Discourtesy	Closed	Operator counseled by management	National Origin
111461	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
111705	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
111910	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
112451	12/4/2023	Operator Discourtesy	Closed	Operator counseled by management	Race
112533	12/5/2023	Operator Discourtesy	Closed	Operator counseled by management	Race

113384	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
113418	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB305404	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
113638	#####	Operator Discourtesy	Closed	Operator counseled by management	National Origin
113643	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB305833	1/7/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
114465	1/21/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
114695	1/25/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
114874	1/30/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
115261	2/7/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
115351	2/9/2024	Operator Discourtesy	Closed	Operator counseled by management	National Origin
115358	2/9/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
115832	2/21/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB332587	2/23/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB332623	2/24/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
116014	2/25/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB332883	3/2/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB333009	3/6/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
116669	3/8/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
116712	3/10/2024	Operator Discourtesy	Closed	Operator counseled by management	Color
116916	3/14/2024	Operator Discourtesy	Closed	Operator counseled by management	Race

NWEB333763	3/16/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
117197	3/20/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
117262	3/21/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
117536	3/27/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
117687	3/30/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
118147	4/9/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
118790	4/22/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
118938	4/25/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB336775	4/27/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
119101	4/29/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
119183	4/30/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
119945	5/14/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB338101	5/24/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB338503	6/1/2024	Operator Discourtesy	Closed	Operator counseled by management	National Origin
121092	6/6/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB338730	6/7/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB348165	6/25/2024	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
122538	7/5/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB348733	7/6/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
123261	7/18/2024	Operator Discourtesy	Closed	Operator counseled by management	National Origin
123366	7/19/2024	Operator Discourtesy	Closed	Operator counseled by management	Race

NWEB349927	7/23/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB350150	7/27/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB350245	7/30/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB350407	8/1/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
124026	8/2/2024	Operator Discourtesy	Closed	Operator counseled by management	National Origin
NWEB350926	8/15/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
125111	8/24/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
126190	9/13/2024	Operator Discourtesy	Closed	Operator counseled by management	Race/Color
NWEB380343	10/2/2024	Operator Discourtesy	Closed	Operator counseled by management	National Origin
127419	10/4/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
127969	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
NWEB381381	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
129231	11/2/2024	Operator Discourtesy	Closed	Operator counseled by management	Race
130184	#####	Operator Discourtesy	Closed	Operator counseled by management	Race
131629	#####	Operator Discourtesy	Closed	Operator counseled by management	Race