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To: City of Madison Transportation Commission

From: Sierra Club Four Lakes Group
Don Ferber, d_ferber@sbcglobal.net
Four Lakes Group Conservation Chair

Date: 11/9/22

RE: Comments on the Equity Analysis of the Proposed Madison Metro System Redesign

These comments are prepared on behalf of the Sierra Club Four Lakes Group. The Four Lakes Group covers nine south central Wisconsin counties with Dane County in the middle. We have nearly 7300 members & supporters across Dane County.

This redesign is one of the most critical and important efforts that will impact current residents and reshape Madison, its outlying neighborhoods and surrounding communities. It will influence future development and livability across our community. We urge members of the Transportation Commission to take the time to ask the questions and make sure that the proposal meets the anticipated needs of the community, and especially the populations that rely on public transit now and in the future.

In a changing community, Madison Metro needs to evolve to provide a more user-friendly, complete and rapid transit system that better serves the entire community in an equitable manner while increasing ridership and reducing car use. With budget limitations, there are obviously some trade-offs that will be made, including that there are transit needs beyond what Metro alone can provide.

Since a critical part of the redesign is to ensure the provision of equitable service, the Four Lakes Group offers the following thoughts relating to the Equity Analysis and the Madison Metro Redesign..

Distance analysis based on block groups: A major concern revolves around the level of analysis that was used for this study. We echo the comments made by the ACLU in their letter to Justin Stuehrenberg. In particular, we would call out the use of block groups, and that assumptions about distances to stops and destinations can easily mask true impacts on localized populations or groups including who benefits and who is impacted negatively.

Using proximity of a bus stop to a block group masks the actual distance many people have to travel to get to a bus stop, and the conditions someone may have to navigate to get there. These are critical factors that may leave many people well outside the ¼ mile that is the assumed reasonable walking distance for many people, especially in winter or adverse weather conditions.

Travel time analysis: The analysis reflects assumptions made about travel times based on route frequency that don't reflect actual wait times for low frequency routes, and hence cast the reroutes in a better light than current routing. The actual proximity to a bus stop may be more critical than the frequency for some people

who can alter their schedule based on when the bus runs. People cannot alter the distance from their residence to the bus stop.

Reality check - Low income analysis without downtown: While there is strong service through the downtown and to major destinations, do we know where many, especially low-income residents in outlying areas, actually want to go for work, to shop, to a health provider, or other destinations? The simple conclusion that more people can go to more places does not assure that many who are most in need of good transit service have the service they need. An earlier survey from the Community Engagement Report indicates that they thought Metro's highest priorities and concerns should revolve around better access for those in need, and providing expanded mobility for low-income residents in isolated neighborhoods. This should also be done with an eye towards where current and future affordable housing is and will be located as well as senior living communities..

The inclusion of many low-income, primarily students (many who identify as minority), in the downtown area who are well served by transit can mask the impacts on low-income, minority residents in outlying areas by the large number of downtown low-income residents. (Note the highest poverty density on page 5 of the Equity Analysis is in the general downtown/campus area that is well served by transit.) While this bias is true with current service as well, the goal should be to assure that the Metro redesign will optimize service to those most in need, not merely improve on the current situation.

A more detailed analysis leaving out those well served downtown would also help better define what the true transit needs are to outlying areas, and more precisely as to the needs of various groups by race, ability and geography. A key issue is to address more fully the first mile/last mile service concerns, and if ancillary or other solutions such as some form of micro transit may be needed.

More current census data: The census data used appears to be from 2018. With our community undergoing extensive growth and change, using more recent data, perhaps along with some near-term projections, might also provide additional accuracy and insight.

Independent and Objective Equity Analysis: It is also of concern that the same consultant who did the redesign plan also performed the Equity Analysis, raising concerns about conflict of interest. A superior approach that would avoid potential confirmation bias would be to have a separate firm analyze the equity of the proposed redesign. The Four Lakes Group supports this as a standard practice for all major City projects so that the analysis, whether by a city department or independent contractor, is independent from the entity that is designing the project.

Outreach Process - Can We Do Better? Despite a fairly extensive outreach process, it has not been particularly successful in reaching marginalized communities and getting their input and feedback. Additional effort to meet people on their own terms would be beneficial to gathering information from people most in need of Metro's services.

Adhering to the concerns and suggestions above and doing further analyses would require more time and expenditure, but if we are to have a good roadmap of our true transit needs, and provide the equity we strive to achieve, then the additional effort is likely to also provide superior results and outcomes.

Four Lakes Group Previous Comments on the Redesign: We would also refer you to the Four Lakes Group comments previously submitted in March and linked here:

https://drive.google.com/file/d/1oDNDdothWWk4II_XwR-5aGcH3q-U7YPp/view?usp=share_link