



September 6, 2022

Will Ringland, Chair  
Jane Nemke, Vice-Chair  
Disability Rights Commission

To the Transportation Commission and Transportation Policy & Planning Board,

The Disability Rights Commission (DRC) recently met to discuss the Metro redesign after members attended the recent EOC presentation. We appreciate the efforts Metro has made towards inclusivity in the redesign effort but wish to raise concerns regarding the effects the changes could have on both individuals with disabilities as well as Metro itself.

Our concerns can be expressed in the following three ways which feed into our more general worry about disability representation and equity when Metro develops their projects.

### **Concern #1: representation of disabled people in data collection**

It is unclear to DRC if any individuals with disabilities, particularly with mobility issues, were included in surveys/research used to decide new routes and stops. What did Metro do to ensure people with disabilities were well represented in data collection processes?

### **Concern #2: increase in “walk” time and distance to stops**

Map reference: [https://www.cityofmadison.com/metro/documents/network-redesign/draftplan/220309MetroRedesign\\_FINAL.pdf](https://www.cityofmadison.com/metro/documents/network-redesign/draftplan/220309MetroRedesign_FINAL.pdf)

The analysis maps for “residents dependent upon transit” shows the majority of changes result in increased walk distance necessary for individuals to get to a stop. This burden on individuals with disabilities is much higher than on non-disabled persons. Given that the intent of the redesign is to funnel more people through fewer stops and at a higher rate, there is an implicit increase in density of traffic, which also disproportionately affects individuals with disabilities. When it is hard to move, concentrating more people around the person with those disabilities decreases overall mobility.

### **Concern #3: Paratransit volume increases**

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With these changes, we are concerned that Paratransit will be unable to accommodate the increased volume of requests. What changes will be made to help this transfer of usage for the folks who cannot access the redesign routes? How can scheduling be made easier so that individuals with disabilities that will need the service more can still go about their lives?

## Recommendations for change

All of the above suggest process issues within Metro that result in equity disparity that should be addressed. Metro has been receptive to feedback, both from the DRC as well as the public, but we have yet to hear concrete ideas or actions to address the inequity. From our internal conversations, the DRC has the following recommendations:

### *Include RESJI surveys at the start of project planning*

The City of Madison has created tools in 2018 to establish racial equity and social justice as a core principle in all decisions, policies and functions of the City. A first useful step would be to integrate the analysis tools into the beginning of Metro's process, rather than after, which seems to be the current intent for the redesign.

*These tools can be found at this URL:*

<https://www.cityofmadison.com/civil-rights/programs/racial-equity-social-justice-initiative/analysis-tools>

Also, DRC **strongly recommends** holding off on a final vote on the redesign until this survey is completed.

### *Include individuals with disabilities on the Transportation Commission and Transportation Policy & Planning Board*

Appointing a person with a mobility disability who is also a user of the transit system would go a long way to ensuring voices of disabled people are included in planning. **DRC would be happy to help** find a person, either from our own group, or through contacts within activist groups in Madison, should you wish the help.

### *Regular updates to the DRC following access settlement*

Metro is required to work with Civil Rights to ensure better accessibility of transit systems. DRC would be interested in receiving similar reports and hearing guidance on projects.

## Summary

Honestly, we want to help with these things - it's why we are here - rather than just decree things to make your jobs slower. We legitimately care about the City and the people Metro serves. We just have a unique perspective that is available to you but you have to seek it to receive its benefits.

This is about people, so let us work together to make things better. Writing letters is slow and impersonal but having specifics in writing is valuable. We would be thrilled to discuss these options further at our monthly meeting.

Sincerely,

Will Ringland, Chair

Jane Nemke, Vice-Chair