

**From:** [Liz Wessel](#)  
**To:** [Transportation Commission](#)  
**Subject:** Item 74248: Title VI Equity Analysis  
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Members of the Transportation Commission

RE: Item 74248

I am contacting you today to ask you to reject the Title VI Equity Analysis that has been presented to the Commission for the Proposed Madison Metro Network Redesign. The analysis of this very important and expansive change to the Madison Metro system - a complete route redesign - has not been evaluated in an independent manner nor has it used the most up-to-date data or techniques available for such an analysis of impacts on minority communities as well as differently-abled and those who cannot and choose not to drive within our community.

What makes the analysis most suspect to me is the lack of an independent analysis. I was very interested to see the results of the analysis thinking that it would be independent from the consultant and the City staff working on the redesign. I was hopeful that a clear eyed view of what had been done in the process and the results in the proposal would be put to the test. And quite frankly that my concerns and others would be put to rest.

In my brief time that I have been able to research the FTA Title VI Equity Analysis required for transportation projects receiving federal funding, I have found resources recommending better ways to do an analysis and to improve the process. We are in a moment in history and in Madison's transportation history where we need to make sure that we due the best job possible on an equity analysis. The proposed Network Redesign that faces the Commission is not just changes to several routes and schedules but a full overhaul of the Metro Network.

Madison's 2017 guidelines for a Title VI analysis need to be considered the starting point for our analysis of the proposal. We should be pushing the bar using new techniques and suggestions coming from those across the country who want to see the most equitable outcomes from transportation funding overcoming institutional and historic racism. Redlining is real. I experienced it looking for our first home at the end of the 80s. Discriminatory covenants in neighborhoods are real and they have impacted where different populations have settled and lived in Madison and the services provided to them.

"[Better Ways for FTA to Measure Transit Equity](#)" by the TransitCenter provides both a critique and suggestions for improving a Title VI Equity Analysis. This blog post links to a tool (Dec 2021) produced by the TransitCenter in collaboration with Center for Neighborhood Technology - [Equity in Practice](#), targeted at transit agencies. This could provide some useful suggestions on how to improve Madison's own guidance

for the Title VI process.

BUT let's not wait for the next major revision of the transit network. Let's take the time now to assure that we do have it right. I urge the Commission to reject the analysis and request that an independent agent that is not directly invested in the project financially provide an equity analysis.

I also support the comments and position of the Four Lakes Group of the Sierra Club on this agenda item.

Thank you for the work you do for our community.

Liz

Liz Wessel

*pronouns: she, her, hers*

Sierra Club Four Lakes Group

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