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To: City of Madison Transportation Commission

From: Sierra Club Four Lakes Group  
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RE: Item 74248: Request for the Commission to Reject the Equity Analysis for the Proposed Redesign of the Madison Metro System

Transportation Commission members:

The Sierra Club Four Lakes Group submitted comments on the Metro Network Redesign Title VI Equity Analysis for the 11/9/2022 hearing. This is to provide some additional information based on our concern that the current analysis comes up short of ensuring that Madison will have the exemplary bus system our community deserves. To clarify, we support proceeding with the core BRT, but want to ensure that the equity goals will be achieved for the peripheral transit network before being implemented next June. In addition, we would note that Transportation Policy and Planning board members voiced strong concerns and only narrowly approved this analysis.

We recommend the Transportation Commission reject this analysis as insufficient and request an added analysis be done based on the following points.

**Rethink the ¼ mile distance for bus stop distances and ridership access**

Using ¼ mile distances from census block groups significantly underestimates actual distances for riders to access bus stops. Using block data or other more fine-grained analysis would provide a much more accurate and reliable analysis. This is critical in assessments for people with disabilities, with heavy loads or children, or during bad weather or construction that may provide added hindrances, as well as to assess ridership potential accurately.

Madison's own [Madison Neighborhood Indicators Project](#) done in concert with the UW Madison Applied Population Laboratory demonstrates a capability to do analysis much more accurately down to the dwelling level. Such analysis would surely improve accuracy on assessing ridership potential and access distances.

Studies have also shown variable responses to using a ¼ mile access distance based on factors such as bus frequency, neighborhood walkability and safety, busy crossings, climate, etc. Riders also prefer spending more time sitting on a bus than walking or waiting when there is bad weather. (See <https://streets.mn/2014/09/11/the-case-for-quarter-mile-bus-stop-spacing/>.)

**Use current census data**

Census data should be as current and accurate as possible and 2020 data is available. The 2018 data used in the existing analysis is older and lacking in accuracy since it was calculated based on the previous decennial count. Especially with Madison's rapid changes, this can create significant inaccuracies in who is impacted where.

Madison's own guidance for an Title VI Equity Analysis indicates data should be revisited annually to adjust for differences in population and other changes in the City (affordable housing etc.).

*5. Review census data and future Metro survey data annually to properly distinguish areas of low income, LEP and minority populations in an evolving population. Additionally, analyze census/survey data in accordance with Metro service maps and schedules. [from page 6 of Metro Transit Title VI Program 2017, Effective Strategies]*

### **Travel time analysis should be based on real world behavior**

Analysis of travel times need to be based on real world behavior, not models that assume wait times based on bus route frequency midpoints. The redesign relies heavily on high frequency BRT ridership numbers that skew the results to favor the redesign, whereas people can generally show up a few minutes ahead of the bus arrival, especially with the ability to track buses using smartphones.

### **Provide additional analysis that deemphasizes the dense downtown population to better understand the impact and equity issues for populations living at the periphery**

The current analysis is based primarily on numbers of riders which biases the downtown and employment centers. More ridership is desirable, but especially downtown, many people are and will continue to be well served. An analysis of how well peripheral minority, elderly and differently-abled populations are being served should be done without including downtown residents who are often low-income - some areas with high student numbers.

The highest priorities identified by Madison bus rider surveys were for expanded mobility for low-income in outlying areas and basic access for everyone who needs it. To provide equity, we need to ensure that both the start and end points are readily accessible for especially those who need to depend on good bus service.

### **Analysis needs to be based on equity access needs and race**

Aggregated ridership numbers mask who is (and isn't) well served by the bus service redesign based on need, as well as proximity. Assessing equity is best served by discerning those reliant on bus service as well as where they are located using a more fine-grained analysis.

As the ACLU letter to Metro General Manager Justin Stuehrenberg states, the analysis does not focus on the specific impacts on various racial groups, as well as people with disabilities. These are exactly the groups that need to be well defined to ensure that they are not being underserved compared to white bus riders.

Meeting the FTA Title VI analysis requirements should be considered the starting point for an equity analysis to be improved on by what others have learned in the 5 years since Madison's Title VI guidelines were approved. **The primary goal should be to identify overall transit needs for the community on an equitable basis, and then determine how best to meet that need, with Metro being a critical, but not only, component of that plan.**

"[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.

### **Equity Analysis should be an independent analysis and review**

Impartial and objective analysis is critical, especially when long-standing equity concerns and public trust are being addressed. Having the same consultant do the equity analysis that did the redesign plan (and has a stake in its success), regardless of the firm's capability, does not provide an ideal or trustworthy project assessment. Using an impartial assessor for the equity analysis avoids appearances of bias, strengthens public's trust, provides an additional valuable perspective, and provides a better environment for optimal analyses and project outcomes.

### **Moving forward**

Rejection of and addition to this analysis need not impede progress moving forward since the core BRT system is unlikely to change. Further analysis may offer more detailed and critical information to inform bus routes and times decisions in peripheral areas, increase transit equity and public acceptance, and reduce future corrections. If we are to have a bus system that lives up to the goals set, then an equity analysis that contains better verification is needed.

Thank you for your attention to and work on this critical transportation equity issue.