



# Milwaukee County Transit System

## 2023 Title VI Program



## 2023 MCTS TITLE VI PROGRAM

This document is a collection of various memos and reports relating to MCTS' ongoing efforts to:

- Ensure that public transportation services are provided in a non-discriminatory manner
- Promote full and fair participation in public transportation decision making without regard to race, color, or national origin
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency

Because this update is a collection of various documents, each with their own numbering system, a unified numbering system will appear in the upper right corner of each page in this binder for the reader's convenience. These numbers will be prefixed with an "A" and will correspond with the page numbers shown below.

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## Milwaukee County Transit System Interoffice Memorandum

TO: Denise Wandke, Managing Director

FROM: Tom Winter, Director, Service Development Department  
Jesus Ochoa, Planning Manager

SUBJECT: Executive Summary - 2023 MCTS Title VI Program Update

DATE: June 16, 2023

### OVERVIEW

The MCTS 2023 Title VI Program Update represents an update of the 2020 Title VI plan submitted by Milwaukee County to the Federal Transit Administration (FTA). FTA Circular 4702.1B sets forth the guidelines for providing information on the non-discriminatory provision of transit services as required by Title VI of the Civil Rights Act of 1964. The Update includes ten general reporting requirements and five specific requirements that are mandated for transit providers:

### GENERAL REPORTING REQUIREMENTS

Per the FTA guidance, there are several reporting requirements that, collectively, represent a transit agency's commitment to delivering meaningful access to transit services in a non-discriminatory manner. The required elements are listed below:

- Title VI Notice to the Public
- Title VI Complaint Procedures and Form
- Summary of Title VI Complaints
- Public Participation Plan
- Public Outreach & Involvement Activities
- Limited English Proficiency Plan
- Minority Representation on Planning and Advisory Bodies
- Monitoring of Sub Recipient Title VI programs
- Approval of Title VI Program by Governing Entity
- Policy Definitions for Major Service Change, Disparate Impact, and Disproportionate Burden

### ADDITIONAL REQUIREMENTS FOR TRANSIT PROVIDERS

In addition to the reporting requirements noted above, the MCTS Title VI Plan includes service standards and policies, demographic data of minority and low-income populations served, Title VI monitoring program, public engagement process regarding major service change policy, disparate impact policy and disproportionate burden policy and finally, results of recent service and fare equity analyses.

**2023 TITLE VI PROGRAM UPDATE: SERVICE AND FARE EQUITY ANALYSES**

- Title VI Fare Equity Analysis for the new MCTS Fare Collection System
- Service Equity Analyses from 2021 on Suspension of Routes 40, 43, 44, 46, 48, 49 and 137
- Service Equity Analyses from 2022 on Routes 18, 40, 43, 44, 46, 48, 49, 54, 60, and 137 (2023 Budget)
- Service Equity Analyses from 2023 on the CONNECT 1 Bus Rapid Transit, GoldLine Route 14 and Route 52

**CONCLUSION**

As a recipient of FTA funds, MCTS must comply with Title VI of the Civil Rights Act of 1964, the U.S. Department of Transportation's implementing regulations at 49 CFR Part 21, and FTA's Title VI Circular 4702.1B. Through the successful implementation of the 2020 Title VI Program Update, MCTS will be able to ensure that transit services are provided in a non-discriminatory manner in Milwaukee County.



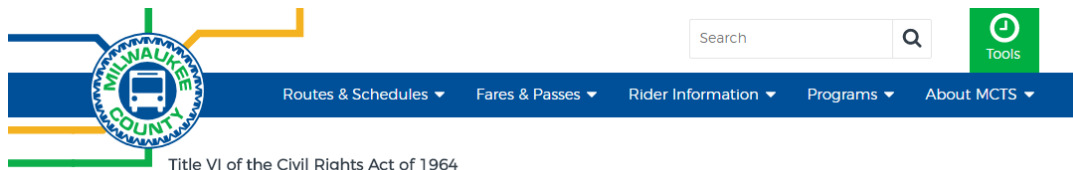
**Milwaukee County Transit System  
Interoffice Memorandum**

**TO:** File  
**FROM:** Jesus Ochoa, Planning Manager  
**SUBJECT:** Title VI Notice to the Public  
**DATE:** March 15, 2023

The Federal Transit Administration (FTA) requires transit providers display a notice to the public informing customers of their rights under Title VI. At a minimum, this notice must be posted on Milwaukee County Transit System’s (MCTS) website and in the public areas of MCTS’ offices and facilities.

An example of MCTS’ notice to the public is shown on the next page. This notice is available on MCTS’ website (<https://www.ridemcts.com/about-mcts/title-vi>), in the lobby of MCTS’ Administration Building, and in the vestibules of MCTS’ operating stations which are open to the public. This notice is also displayed in the MCTS Transit Guide, on printed Route Schedules (where space permits) and on the interior of all MCTS buses.

This notice is also available in Spanish, the language spoken by the Limited English Proficient (LEP ) population that meets the Safe Harbor Threshold in the Milwaukee area.



"No person in the United States 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 Milwaukee County Transit System (MCTS) respects civil rights and operates its programs and services without regard to race, color or national origin. MCTS is committed to complying with Title VI requirements in all of its programs and services.

For more information on the Title VI transit obligations, contact MCTS 8:00 a.m. - 4:30 p.m. Monday-Friday as listed below:

**MCTS Human Resources Department**  
1942 North 17th Street  
Milwaukee, WI 53205  
414-344-4550 or 711 (TRS)  
[Title6@MCTS.org](mailto:Title6@MCTS.org)

**Making a Title VI Complaint**

Any person who believes he/she has been subjected to discrimination in the delivery of or access to public transportation services on the basis of race, color or national origin, may file a complaint with Milwaukee County Transit System (MCTS). Such complaint must be filed in writing with MCTS no later than 180 days after the alleged discrimination. [You can file your complaint using this form.](#) Once completed, you can print



## Milwaukee County Transit System

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(414) 344-4550 • RideMCTS.com

the form and mail to MCTS at the address below.

### [Title VI Complaint Procedures](#)

For more information on how to file a complaint, contact MCTS as listed below:

#### MCTS Human Resources Department

1942 North 17th Street

Milwaukee, WI 53205

414-344-4550 or 711 (TRS)

[Title6@MCTS.org](mailto:Title6@MCTS.org)

### [2017 MCTS Title VI Update](#)

#### Política del Título VI

"No se le negará a ninguna persona que resida en Estados Unidos la participación o beneficios, por motivo de su raza, color u origen nacional, ni será discriminada en ningún programa o actividad que reciba asistencia financiera federal".

Milwaukee County Transit System (MCTS) respeta los derechos civiles y opera sus programas y servicios independientemente de la raza, el color u origen nacional. El MCTS se compromete a cumplir con los requisitos del Título VI en todos sus programas y servicios. Para obtener más información acerca de las obligaciones de tránsito contenidas en el Título VI comuníquese con el MCTS como se indica a continuación.

#### CÓMO REALIZAR UN RECLAMO CONFORME AL TÍTULO VI

Toda persona que crea que ha sufrido un acto de discriminación al momento de prestársele o de recibir el servicio de transporte público en base a su raza, color u origen nacional puede presentar un reclamo al Milwaukee County Transit System (MCTS). El reclamo debe presentarse por escrito al MCTS antes de transcurridos 180 días posteriores al supuesto acto de discriminación. Para obtener más información acerca de cómo presentar un reclamo, comuníquese con el MCTS como se indica a continuación:

#### MCTS Human Resources Department

1942 North 17th Street

Milwaukee, WI 53205

414-344-4550 or 711 (TRS)

[Title6@MCTS.org](mailto:Title6@MCTS.org)

[Formulario de Queja de MCTS por el Título VI.](#)

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## MILWAUKEE COUNTY TRANSIT SYSTEM (MCTS)

### Title VI Complaint Procedures

Title VI of the Civil Rights Act of 1964 states that “no person in the United States 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.”

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with the Human Resources Department, Milwaukee County Transit System, 1942 North 17<sup>th</sup> Street, Milwaukee, WI 53205. Complainants have the right to complain directly to the appropriate Federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the MCTS representative may be utilized for resolutions.

#### PROCEDURE

1. The complaint must include the following:
  - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The MCTS representative will interview the Complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the Complainant or his/her representative.
  - b. Include the date(s) of the alleged act of discrimination.
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
  - d. Federal law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the MCTS representative will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.
3. The Complainant will be provided with a written acknowledgment that MCTS has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
  - a. The complaint must be filed within 180 days of the alleged occurrence.
  - b. The allegation must involve a covered basis such as race, color or national origin.
  - c. The allegation must involve a MCTS service, the County of Milwaukee as a Federal-aid recipient, or its sub-recipient.
5. A complaint may be dismissed for the following reasons:
  - a. The Complainant requests the withdrawal of the complaint.
  - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The Complainant cannot be located after reasonable attempts.



6. MCTS representative will prepare an investigative report within 90 calendar days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
7. The investigative report and its findings will be reviewed with MCTS officials and in some cases the investigative report and findings will be reviewed by MCTS' legal counsel.
8. The MCTS representative/legal counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
  - a. In the event MCTS is in noncompliance with the Title VI regulations, remedial actions will be listed. MCTS will take necessary action in order to come into compliance.
  - b. If the investigation concludes that MCTS is not in violation of Title VI, findings describing compliance will be documented.
9. Notice of the MCTS representative's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
  - a. The MCTS representative will reconsider the determination if new facts come to light.
  - b. If Complainant is dissatisfied with the determination and/or resolution set forth by the MCTS representative, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 200 W. Adams Street, Suite 320, Chicago, IL 60606, telephone 312-353-3855.
10. A copy of the complaint and the MCTS representative's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
11. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

## SISTEMA DE TRÁNSITO DEL CONDADO DE MILWAUKEE (MCTS)

### Procedimientos de Queja para el Título VI

El Título VI de la Ley de Derechos Civiles de 1964 dice que *“ninguna persona en los Estados Unidos será excluida de la participación en ningún programa o actividad que recibe ayuda financiera federal, ni le serán negados los beneficios correspondientes a dichos programas o actividades, ni estará sujeta a discriminación bajo estos programas o actividades, en base a su raza, color u origen nacional”*.

Toda persona que crea que, individualmente o como miembro de cualquier clase específica de personas, ha estado sujeta a discriminación en base a su raza, color u origen nacional podrá presentar una queja escrita ante el Departamento de Recursos Humanos del Sistema de Tránsito del Condado de Milwaukee, 1942 North 17<sup>th</sup> Street, Milwaukee, WI 53205. Los reclamantes tienen derecho a quejarse directamente a la agencia federal apropiada. Se harán todos los esfuerzos para lograr una resolución pronta de las quejas. Podrá usarse la opción de una o varias reuniones entre las partes afectadas y el representante de MCTS para las resoluciones.

#### PROCEDIMIENTO

1. La queja deberá incluir los siguientes elementos:
  - a. La queja será por escrito y estará firmada por el o los reclamantes. En casos en que el Reclamante no puede o es incapaz de brindar una declaración escrita, podrá hacerse una queja verbal. El representante de MCTS entrevistará al Reclamante y ayudará a la persona a poner las quejas verbales por escrito. Sin embargo, todas las quejas deberán estar firmadas por el Reclamante o su representante.
  - b. La o las fechas del supuesto acto de discriminación.
  - c. Deberá presentar una descripción detallada de los asuntos, incluyendo nombres y puestos de trabajo de las personas percibidas como partes en la queja.
  - d. La ley federal exige que las quejas sean presentadas dentro de los 180 días naturales posteriores al supuesto incidente.
2. Al recibir la queja, el representante de MCTS determinará su jurisdicción, su aceptabilidad, la necesidad de información adicional e investigará la queja, si es aceptada.
3. Se le brindará al Reclamante un acuse de recibo por escrito de que MCTS ha aceptado o ha rechazado la queja.
4. Una queja deberá cumplir con los siguientes criterios para ser aceptada:
  - a. La queja deberá ser presentada dentro de los 180 días posteriores al supuesto incidente.
  - b. La acusación deberá involucrar una base que está cubierta, como raza, color u origen nacional.
  - c. La acusación deberá involucrar un servicio de MCTS, el Condado de Milwaukee como un receptor de ayuda federal, o su sub-receptor.
5. Una queja podrá ser descartada por las siguientes razones:
  - a. El Reclamante solicita retirar la queja.
  - b. El Reclamante no responde a repetidos pedidos de información adicional necesaria para procesar la queja.
  - c. El Reclamante no puede ser localizado luego de intentos razonables.

6. El representante de MCTS preparará un informe de investigación dentro de los 90 días naturales posteriores a la aceptación de la queja. El informe incluirá una descripción narrativa del incidente, la identificación de las personas entrevistadas, resultados y recomendaciones para su solución.
7. El informe de investigación y sus resultados serán revisados por oficiales de MCTS, y en algunos casos el informe de investigación y sus resultados serán revisados por el asesor legal de MCTS.
8. El representante/asesor legal de MCTS tomará una decisión con relación a la solución de la queja. Las soluciones de la queja serán indicadas de la siguiente forma:
  - a. En caso que MCTS esté incumpliendo las reglamentaciones del Título VI, se indicarán medidas correctivas. MCTS tomará la acción necesaria a fin de lograr el cumplimiento.
  - b. Si la investigación llega a la conclusión de que MCTS no está violando el Título VI, los resultados que describen el cumplimiento serán documentados.
9. La notificación de la determinación del representante de MCTS será enviada por correo al Reclamante. La notificación incluirá información relacionada con los derechos de apelación del Reclamante junto con instrucciones para iniciar dicha apelación. La notificación de apelaciones son como sigue:
  - a. El representante de MCTS reconsiderará la determinación si salen a luz nuevos hechos.
  - b. Si el Reclamante está insatisfecho con la determinación y/o resolución estipulada por el representante de MCTS, dicha queja podrá ser presentada a la Administración Federal de Tránsito (FTA) para su investigación. Se le aconsejará al Reclamante que contacte a la Administración Federal de Tránsito, Oficina de Derechos Civiles, 200 W. Adams Street, Suite 320, Chicago, IL. 60606, teléfono 312-353-3855.
10. Una copia de la queja y el informe de investigación/carta de resultado del representante de MCTS y el Plan de Medida Correctiva Final, si corresponde, serán enviados a la FTA dentro de los 120 días posteriores a la recepción de la queja.
11. Un resumen de la queja y su resolución serán incluidos como parte de las informaciones relacionadas con el Título VI a la FTA.



# MCTS Title VI Complaint Form

Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require that *no person in the United States shall, on the grounds of race, color, 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 following information is necessary to assist us in processing your complaint. Assistance is available upon request. If information is needed in another language, then please contact us at 414-937-3218 or Title6@mcts.org.

Please complete and return this form to the following: Human Resources Department Milwaukee County Transit System, 1942 North 17th Street, Milwaukee, WI 53205-1697, or email to Title6@mcts.org.

1. Complainant's Name \_\_\_\_\_

2. Address \_\_\_\_\_

3. City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

4. Telephone Number (home) \_\_\_\_\_ (business) \_\_\_\_\_

5. Email Address \_\_\_\_\_

6. Person discriminated against (if someone other than the complainant)

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

7. In your own words, describe your complaint. You should include specific details such as names, dates, time, route numbers, witnesses and any other information that would assist us in our investigation of your allegations. If you have additional documentation related to this complaint, please include as an attachment. Please use the back of this form if additional space is required.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Have you filed this complaint with any other federal, state or local agency; or with any federal or state court? Yes  No

If yes, check each box that applies:

Federal agency  Federal court  State agency  State court  Local agency

9. Please provide information about a contact person at the agency/court where the complaint was filed.

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number \_\_\_\_\_ Email address \_\_\_\_\_

10. Signature required below.

\_\_\_\_\_  
Complainant's Signature Date



### Formulario de Queja de MCTS por el Título VI

El Título VI de la Ley de Derechos Civiles de 1964 y estatutos y reglamentos relacionados contra la discriminación estipulan que *ninguna persona en los Estados Unidos será excluida de la participación en ningún programa o actividad que recibe ayuda financiera federal, ni le serán negados los beneficios correspondientes a dichos programas o actividades, ni estará sujeta a discriminación bajo estos programas o actividades, en base a su raza, color u origen nacional*”.

La siguiente información es necesaria para ayudarnos a procesar su queja. Hay ayuda disponible si la solicita. Si se necesita información en otro idioma, contáctenos al 414-937-3218 o por Title6@mcts.org.

Complete por favor este formulario y devuélvalo a la siguiente dirección: Departamento de Recursos Humanos Milwaukee County Transit System, 1942 North 17th Street, Milwaukee, WI 53205-1697, o envíe un e-mail a Title6@mcts.org.

1. Nombre del reclamante \_\_\_\_\_

2. Dirección \_\_\_\_\_

3. Ciudad \_\_\_\_\_ Estado \_\_\_\_\_ Zip \_\_\_\_\_

4. Teléfono (hogar) \_\_\_\_\_ (trabajo) \_\_\_\_\_

5. E-mail \_\_\_\_\_

6. Persona que ha sido discriminada (si es distinta del reclamante)

Nombre \_\_\_\_\_

Dirección \_\_\_\_\_

Ciudad \_\_\_\_\_ Estado \_\_\_\_\_ Zip \_\_\_\_\_

7. Con sus propias palabras, describa su queja. Deberá incluir detalles específicos, como nombres, fechas, horario, número de ruta, testigos y toda otra información que nos podría ayudar en nuestra investigación de sus acusaciones. Si tiene documentación adicional relacionada con esta queja, inclúyala por favor como un adjunto. Use por favor el dorso de este formulario si necesita espacio adicional.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. ¿Ha presentado esta queja ante alguna otra agencia federal, estatal o federal, o ante algún tribunal federal o estatal? Sí  No

Si contestó “Sí”, marque el casillero correspondiente:

Agencia federal  Tribunal federal  Agencia estatal  Tribunal estatal  Agencia local

9. Brinde por favor información acerca de una persona de contacto en la agencia/tribunal donde se presentó esta queja.

Nombre \_\_\_\_\_

Dirección \_\_\_\_\_

Ciudad \_\_\_\_\_ Estado \_\_\_\_\_ Zip \_\_\_\_\_

Teléfono \_\_\_\_\_ E-mail \_\_\_\_\_

10. Se requiere la firma abajo.

\_\_\_\_\_  
Firma del reclamante

\_\_\_\_\_  
Fecha



## Milwaukee County Transit System

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### Milwaukee County Transit System Interoffice Memorandum

**TO:** File

**FROM:** Ben Stark, MHRLR - Human Resources Director

**RE:** Title VI Summary of Complaints 2020-2022

**DATE:** June 9, 2023

In regards to the Federal Transit Administration's request for information regarding Title VI complaints, the Milwaukee County Transit System received no Title VI complaints from January 1, 2020 through December 31, 2022.

MCTS  
Public  
Participation  
Plan

2023

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# Glossary

**ADA:** The Americans with Disabilities Act prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation.

**Civil Rights:** Civil Rights are a class of rights and freedoms that protect individuals from unwarranted action by government and private organizations and individuals and ensure one's ability to participate in the civil and political life of the state without discrimination or repression.



**Community-Based Organization (CBO):** Community-Based Organizations are non-profit, neighborhood, community, ethnic, or business association groups that provide support and services to the community and businesses, through services that may include health, educational, employment training, business formation support and assistance, community building, and other social welfare services.

**Community Meeting/Workshop:** Community meetings are formal or informal opportunities for staff to receive public feedback in an interactive setting. They are held in a public space and open to the general public, although individuals or groups may be specifically invited. Community meeting formats include workshops, charrettes, and open houses.

**Limited English Proficiency (LEP):** This Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

**Low-income:** Households which earn less than \$30,000 a year as defined by the US Census Bureau.

**Marginalized Populations:** Groups or communities excluded from mainstream social, economic, cultural, or political life. Examples of these populations include, but are by no means limited to, groups excluded due to race, religion, political or cultural group, age, gender, or financial status.

**Minority or BIPOC-Black, Indigenous, and People of Color:** A person who does not identify as part of the white or of European descent:

- Black or African American: a person having origins or a descendant of one of the various in any of the black racial groups of Africa.
- Latino/a/x: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Latin American culture or origin, regardless of race, connected by their history of being colonized.
- Asian or Pacific Islander: a person having origins in any of the original peoples of the Far East, Southeast Asia, Indian Subcontinent, or the Pacific Islands
- American Indian or Alaskan Native: a person having origins in any of the original peoples of North America and who maintain cultural identification through tribal affiliation or community recognition.

**Online Outreach:** Online outreach provides a forum to both inform the public about an initiative and solicit public feedback. Online outreach includes surveys on websites or other web-based discussion platforms.

**Public Participation Plan:** Recipients of Federal Transit Administration (FTA) funding must submit a plan that details strategies to engage minority and limited English proficient (LEP) populations in its planning and programming activities. These efforts may be part of a broader framework that also includes outreach strategies for other traditionally underserved constituencies, such as people with disabilities and low-income populations.

**Racial Equity:** The condition that would be achieved if one's racial identity no longer predicted how one fares. This is part of what composes racial justice, meaning work to address root causes of inequities, not just their manifestation, must also be done. This includes elimination of policies, practices, attitudes, and cultural messages that reinforce unequal outcomes by race or fail to eliminate them.

**Underrepresented:** A word used to describe a group whose percentage of the population in a given group is lower than their percentage of the population in a given area. In terms of race, Hispanic/Latinx, African Americans, Native Americans, Native Hawaiian/Pacific Islanders and those of two or more races are generally to be considered included in this group.

## Section 1 – Executive Summary

### Purpose

MCTS exists to provide reliable, convenient, and safe public transportation services that effectively meet the varied travel needs of the community and contribute to its quality of life. We make connections daily by getting our customers to their destinations. In efforts to provide the best service to our community we take various measures to gain input and feedback from those to whom we dedicate our service.

In accordance with federal guidelines, MCTS must submit to the Federal Transit Administration (FTA) a Public Participation Plan (referred to as the “Plan”) that details the company’s plans and strategies to engage low-income, BIPOC, and Limited English Proficient (LEP) populations in its planning process as a recipient of federal funds and per Title VI of the Civil Rights Act of 1964 and its implementing regulations. Through the FTA, MCTS is directed to:

- Ensure that the level / quality of public transit service is provided in a nondiscriminatory manner.
- Promote full and fair participation in transit decision-making through an equity lens.
- Ensure access to transit-related programs and activities by persons with limited English proficiency.

The Plan establishes two thematic goals: Provide knowledge and information to the public.

- Effectively communicate future service changes to the public
- Gain insight and input from the public to inform planning decisions.

### Objectives

The overall objective of the Plan is to propose strategies that are aimed to improve the accessibility of MCTS to underrepresented groups but will also help to address constraints and/or barriers that may limit all persons regardless of racial background, income level, or the ability to speak English. Public participation activities will be designed to be accessible to all people. The main objectives of this plan are as follows:

- Make information on major service changes available to the public prior to implementation.
- Increase the participation of the public in major transit-related decisions.
- Obtain an understanding of transit needs, especially for underrepresented populations.

## Section 2 – Overview of MCTS

### History and Facts

Founded in 1975, MCTS is the 35<sup>th</sup> - largest transit system in the nation and the largest transit agency in Wisconsin. As the primary transit provider for Milwaukee County, MCTS services all 19 municipalities inside Milwaukee County and limited service to eight additional municipalities in Waukesha County (Elm Grove, Brookfield, Butler and Menomonee Falls) and Ozaukee County (Mequon, Cedarburg, Grafton and Saukville). MCTS has just under 4,000 bus stops and operates approximately 49 routes, including University Bus service from outlying park-ride lots. MCTS also features limited stop service which serves major destinations across the county and three routes

under contract from the adjoining counties of Ozaukee and Waukesha. With programs such as U-PASS for college students and the Commuter Value Pass program for Milwaukee’s workforce, MCTS is an essential contributor to the education and economic environment of Milwaukee County. MCTS provides just over 15.5 million rides a year—of those, just under 420,000 are through Paratransit, a division of the company that provides rides to people with disabilities.

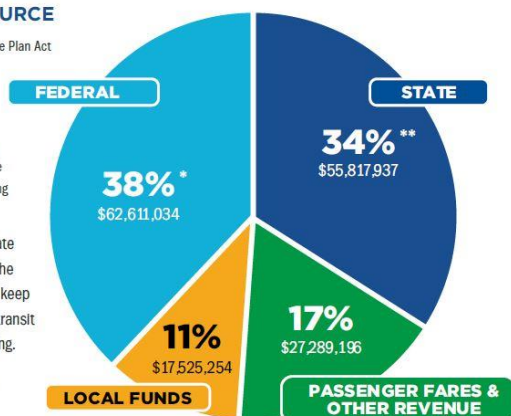
**2022 FUNDING BY SOURCE**

\*Federal funding includes American Rescue Plan Act (ARPA) funding that will be used by the end of 2024. Prior to the pandemic, Federal funding averaged 15%.

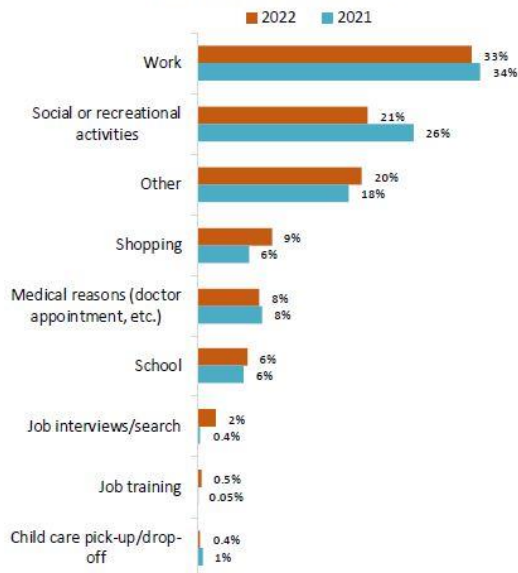
\*\*In non-pandemic years, state funding averaged 45%. We rely heavily on the state because there is no other dedicated funding source for public transit.

Please show your support for the state to allow Milwaukee County to have the ability to increase the sales tax and keep more of our shared revenue. Public transit needs reliable and sustainable funding.

Visit our SaveTheBus page to learn how you can help.



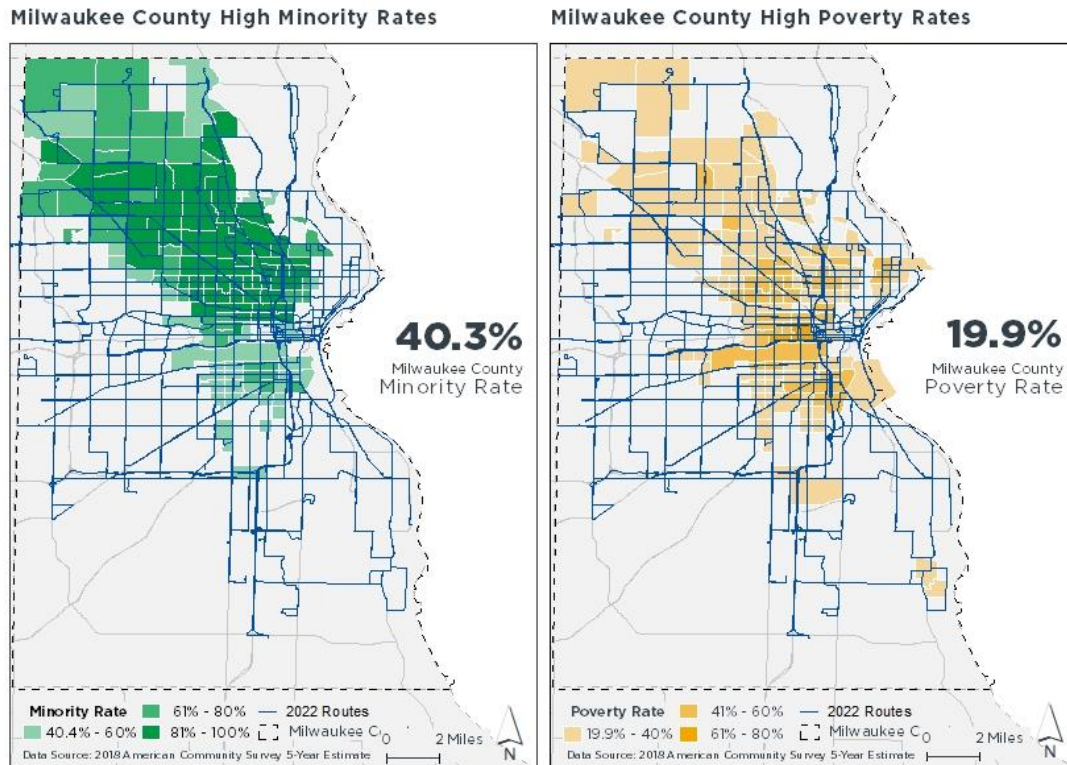
**BUS USE PRIMARY PURPOSE**



Approximately 34% of individuals use MCTS to commute to their jobs daily. With two major educational institutions located in the heart of the city, approximately 40,000 Milwaukee-area college students participate in the U-PASS program, taking advantage of discounted rates to and from college and other destinations. Designations of primary uses are shown above. Since the onset of the COVID-19 pandemic, MCTS, alongside other agencies across the nation, has come to recognize the importance of providing frequent, all-day services beyond peak-hour work and school commuter trips. Shifting this approach and perspective to align with the varying schedules of essential workers is pivotal to ensuring more equitable service. Designations of primary uses are shown above.

**Demographics**

Understanding the extent and characteristics of Title VI-protected populations within MCTS’ service area provides context for a culturally sensitive, customized approach to outreach. The demographic analysis provided here will continue to assist MCTS with its outreach to Title VI populations when planning, holding, or attending events in a given geographic area or when targeting outreach towards a given ethnic community. MCTS serves a population of 918,661 (July 1, 2022, U.S. Census) Milwaukee County residents. The demographic profile of the MCTS service area is approximately 40% minority and 20% low-income (households that are below the poverty threshold). From the maps that follow, a comparison can be seen between where minorities in Milwaukee reside and where low-income populations reside.



## Limited English Proficient (LEP) Population

Milwaukee County is home to a diverse population, including some that speak limited English. There are 148,782 persons or 17% of the total population in Milwaukee County that speak a language other than English at home. The following languages are the most commonly spoken among LEP households in MCTS' service area: Spanish (62%), Other Indo-European languages (16%), Asian and Pacific Islander languages (16%) and other languages (6%) (American Community Survey).

Per Circular 4702.1B, "Title VI and the Title VI dependent Guidelines for FTA Recipients outreach to LEP populations should include meaningful strategies that help to make programs, services, and activities accessible." As a part of this latest Title VI submittal in 2023, MCTS researched and reviewed information recorded internally on previous interactions with members of the public who are LEP. The analysis included the extent to which LEP persons have encountered various departments of MCTS. Several resources were and are still being utilized to ensure that participation efforts are in compliance with continued development of the Plan.

## Section 3 – Techniques for Public Engagement

MCTS will use choose from a variety of techniques as it engages with the public on matters involving transit services and policies. Specific efforts will be tailored depending on the scope of the proposed plan and the resources available for public outreach.

### Public Meetings

- Public Open House – MCTS can host an open house to engage with the public when major changes to service could affect them. In addition, MCTS can host a series of open house meetings for special

projects that involve several service changes occurring at one time—this can also yield needed engagement. These types of meetings would present information on the purpose for the service proposal(s) being discussed and to engage in dialogue and take comments. Staff would be available to interact with the public, answer questions and take comments on the plan.

- Public Hearing – A public hearing will be held by Milwaukee County prior to a fare increase or a major service reduction to receive comments from the public. Its purpose is to provide a forum for people to voice their opinion.
- Spanish speaking personnel can be available during public meetings for LEP populations.
- Virtual Public Meetings: In the face of the COVID-19 pandemic, virtual public meetings became the go-to format for reaching riders with new changes and information. In the system redesign of MCTS NEXT, 3 virtual meetings were held per quarter, including Spanish-only meetings. These meetings were made available online for the public to access at their convenience.

### External Communications

MCTS will provide information to the public via all available communications methods (press releases, media interviews, website, app, social media, automated telephone hotline, e-newsletters, printed newsletters, flyers, posters, targeted advertisements, audio announcements, signage at bus stops, etc.) This includes notices about changes in routes and service, bus stop location changes, upcoming public meetings, and other important information about the company and community. Additionally, MCTS works with community partners and businesses to distribute transit-related information to targeted stakeholders.

MCTS generates and distributes an official press release, sends e-mail notices to all stakeholders, elected officials and our over 43,000 Rider Insider e-mail subscribers, posts on our official Facebook, Twitter and Instagram. We have been able to work with neighborhood groups prior to these events to raise awareness, offer advice and translation/interpretation services as deemed necessary.

- MCTS will include a separate page on RideMCTS.com devoted exclusively to quarterly route and schedule changes. In addition, people that follow MCTS on Twitter, Facebook or Instagram will be notified of upcoming plans / meetings. MCTS will make similar outreach efforts for people that belong to its Rider Insider program.
- MCTS can host an annual online webinar to share with the public what major service changes MCTS is studying for the upcoming year. The webinar would be recorded and made available online to anyone who has access to the internet, including at public libraries and local community organizations. An online survey would accompany the webinar and be posted on RideMCTS.com to improve the ease of obtaining public feedback. This annual webinar will provide an opportunity for attendees to comment on, ask questions and express their views on the proposed changes and existing routes and schedules.

### Customer Service Center

- MCTS will use its Customer Service Center as a two-way engagement tool to communicate upcoming projects and plans. Service Center staff are informed of all major projects underway, public meetings as well as impending service or fare changes to answer any questions callers may have. If a caller would like someone from MCTS staff to return their call, the Service Center will log their comment and assign it to the correct department for follow-up.

### Surveys

- Since 1995, MCTS has collected customer data on a semi-annual basis to better understand customers' needs and who the customers are. This is used to create a ridership profile which has assisted multiple departments.

### Notification Efforts

- MCTS uses on-board audio and visual announcements on a case-by-case basis to announce upcoming impacts to riders. They are pre-recorded and play at a set interval between stop announcements and general messages. This system can also be used to notify riders of any public meetings or plans that may affect them while on board.

## Departmental Responsibilities

MCTS benefits from having a collaborative approach across departments to maximize opportunities for public outreach. This approach is used by many of our peer systems. Below are examples of how various departments are currently interacting with the public.

### Service Development Department

- Conduct research and analysis of existing routes and identify opportunities for expanding, discontinuing, redistributing, or adding services.
- Host webinars/public meetings/public hearings to obtain public feedback on potential major service changes. Service Development will propose any changes at the beginning of the year with implementation goals for the Fall of that same year. This allows enough time for the public to provide feedback on the proposals and provides enough time to collaborate interdepartmentally as the changes are implemented.
- Enable audio announcements on buses about service changes prior to being implemented as well as public service announcements about upcoming public outreach events—in English and Spanish.
- For bus stops that will be eliminated or moved, the Planning Division generates a list of every bus stop where a temporary sign is needed and what information should be disseminated on the temporary sign.

### Marketing Department

- Provide information to the public and provide notice of upcoming outreach activities using all available communications platforms and methods.
- Conducts an annual survey to identify ridership and customer satisfaction.
- Attends events in the community promoting programs and projects.
- Coordinate stakeholder community outreach programs tailored to specific stakeholders for specific feedback. I.e. the teen advisory board that empowers teen transit riders and mobile meet-ups connecting general public and local political leaders as they ride transit through their district.

### Transportation Department

- Responsible for posting notices for detours/changes at bus stops and signage.
- Assign Public Relations Operators to events, as needed.
- Bus Operators undergo customer service training and de-escalation training.

## Adopt Inclusive and Proven Strategies

As the Plan is a working document and will continue to be modified, there are supplemental strategies MCTS

may consider incorporating as part of the core engagement introduced in this plan. These considerations will help ensure that public participation efforts will fulfill Federal requirements, collaborate with the community, and help MCTS build closer relationships in the service area:

- Acknowledge and inform participants of how their input will be used and where to access updates.
- Maintain a database of outreach partners.
- Engage bus operators and station managers in outreach activities.
  - Follow up on how their input influenced a decision.

## Community Collaboration

### Planners at Bus Stops- MCTS NEXT

In response to complete system redesign via MCTS NEXT in 2021, the agency's Transit Planners came out to bus stops to give guidance and direction to onboarding riders whose routes may have been altered or been re-routed. By having the agency's most knowledgeable members out in the community directly assisting passengers, it transcends how we imagine traditional communication to be between administrative staff and the public. This strategy is one that MCTS can look to uphold for each major service change if time and budgetary constraints allow for such outreach.

### Community Clean-ups

Birthered out of the civil unrest that was accentuated in the beginning of the pandemic, members from various departments formed MCTS' first-ever Racial Equity Work Group. Members of this group understood the importance of being active in the community beyond work hours and took it upon themselves to coordinate community clean-ups twice a year, one in the fall and one in the spring, to emphasize their investment in the neighborhoods that MCTS serves daily.

### Mobile Meet Ups

In this newest community outreach program, constituents are given the opportunity to connect with their elected officials on board MCTS bus routes and at bus stops. Mobile Meet Ups provide informal opportunities to talk one-on-one with residents who live and work in their districts about issues of concern, revolutionizing the way policy changes can be made!

### Public Allies Milwaukee

In efforts to build even greater relationships with the community, MCTS' most recent partnership with Public Allies Wisconsin highlights the agency's alignment with the county's mission to advance racial equity and enhance the quality of life through great public service. For the first time, MCTS is partnering with Public Allies, a national movement committed to advancing social justice and equity by engaging and activating the leadership capacities of young people. During the span of 10 months beginning in September of 2021 up to July 2022, three Allies were welcomed onboard to the Marketing, Paratransit, and Planning Departments. Through this collaboration, the perspectives young people from the community are leveraged to enhance Milwaukee County's most vital transit service to the community.

## Section 4 – Appendix I

### Milwaukee County Transit System – 2020-2022 Public Meeting Engagement Activities by Format

<b>Subject Matter</b>	<b>Sponsor</b>	<b>Format</b>	<b>Count</b>
BRT and MCTS NEXT Public Outreach	MCTS & Milwaukee County	Public Meeting	22 in 2020
Community Goodwill Building	MCTS	Public Information Opportunity	1 in 2020
Various	Community Partners and Elected Officials	Engagement	2 in 2020
BRT and MCTS NEXT Outreach Public Outreach	MCTS & Milwaukee County	Public Meeting	41 in 2021
MCTS Service Changes	MCTS	Public Meeting	5 in 2022
Community Goodwill Building	MCTS	Public Information Opportunity	6 in 2022
Various	Community Partners and Elected Officials	Engagement	8 in 2022
		<b>Total</b>	<b>85 in 2020-2022</b>

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### Milwaukee County Transit System - 2020 Public Outreach and Involvement Activities

Subject Matter	Sponsor	For	Date	Location	Attendees
MCTS NEXT Route 56/UPASS	Alverno College Student Government	Local Stakeholder	2/18/2020	Alverno College	Jeff Sponcia, Jesus Ochoa
Answered questions about Route 30 and BlueLine mergers	Supervisor Felisia Martin	Elected Official	3/3/2020	Call	Tom Winter, Jeff Sponcia
Answered questions about Route 30 and BlueLine mergers	Supervisor Felisia Martin	Elected Official	3/5/2020	Courthouse	Dan Boehm, Tom Winter
Presented MCTS NEXT overview and answered questions from 40 attendees	UW-Milwaukee (Urban Planning)	Local Stakeholder	3/12/2020	SARUP Building	Jeff Sponcia
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	3/13/2020	MRMC Offices	Jeff Sponcia, David Locher
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	5/12/2020	MRMC Offices	Jeff Sponcia, Tom Winter, David Locher
Presented MCTS NEXT Overview	TPW&T Committee	Elected Official	6/10/2020	Virtual	Tom Winter
Presented MCTS NEXT overview for their district	Supervisor Sequanna Taylor	Elected Official	6/24/2020	Virtual	Tom Winter, Jeff Sponcia
Presented MCTS NEXT overview for their district	Supervisor Steven Shea	Elected Official	6/29/2020	Virtual	Tom Winter, Jeff Sponcia
Presented MCTS NEXT overview for their district	Supervisor John Weishan	Elected Official	6/30/2020	Virtual	Tom Winter, Jesus Ochoa
Presented MCTS NEXT overview for their district	Supervisor Sequanna Taylor	Elected Official	6/30/2020	Virtual	Tom Winter, Jeff Sponcia
Presented MCTS NEXT Overview	TPW&T Committee	Elected Official	7/8/2020	Virtual	Tom Winter
Continued MCTS NEXT and BRT outreach	MRMC & SEWRPC – Sheri Schmit	Region-wide Stakeholder	7/13/2020	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT Overview	Supervisor Ortiz-Velez	Elected Official	8/5/2020	Virtual	Tom Winter, Jeff Sponcia
Continued MCTS NEXT and BRT outreach	MRMC – Sheri Schmit	Region-wide Stakeholder	8/11/2020	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT overview to their neighborhood	Sherman Park Neighborhood	Local Stakeholder	9/3/2020	Virtual	Jacqueline Zeledon, Jeff Sponcia
Presented MCTS NEXT overview	TPW&T Committee	Elected Official	9/9/2020	Virtual	Tom Winter
Continued MCTS NEXT and BRT outreach	MRMC & SEWRPC – Sheri Schmit	Region-wide Stakeholder	10/5/2020	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT overview to their neighborhood	Envision S. 13 <sup>th</sup> Street Corridor- Amy Oeth	Local Stakeholder	10/5/2020	Virtual	Jeff Sponcia
Presented MCTS NEXT overview to their city	City of Greenfield- Jeff Katz	Local Stakeholder	11/9/2020	Virtual	Tom Winter, Jeff Sponcia
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	11/10/2020	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT overview for their district	Supervisor John Weishan	Elected Official	11/23/2020	Virtual	Tom Winter, Jeff Sponcia
Presented MCTS NEXT overview for their district	Supervisor Sylvia Ortiz-Velez	Elected Official	11/23/2020	Virtual	Tom Winter, Jeff Sponcia

Presented MCTS NEXT overview to their neighborhood for the Plan Advisory Group	Envision S. 13 <sup>th</sup> Street Corridor- Amy Oeth	Local Stakeholder	12/11/2020	Virtual	Jeff Sponcia
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### Milwaukee County Transit System - 2021 Public Outreach and Involvement Activities

Subject Matter	Sponsor	For	Date	Location	Attendees
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	1/26/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT Phase 1 Update	ATU 998	Local Stakeholder	2/8/2021	Virtual	Tom Winter, Jeff Sponcia
Presented MCTS NEXT Phase 1 Update	TPAC	Local Stakeholder	2/16/2021	Virtual	Jeff Sponcia
Presented MCTS NEXT Phase 1 update and answered questions from the public	MCTS	Local Stakeholder	2/17/2021	Virtual	Jacqueline Zeledon, Jeff Sponcia, Jesus Ochoa, Emmanuel Okoro, Chris Fox
Presented MCTS NEXT Phase 1 update in Spanish along with VIA CDC's Lidia Villazaez	MCTS	Local Stakeholder	2/25/2021	Virtual	Jesus Ochoa
Presented MCTS NEXT Phase 1 update and answered questions from the public	MCTS	Local Stakeholder	2/27/2021	Virtual	Jacqueline Zeledon, Jeff Sponcia, Jesus Ochoa, Emmanuel Okoro, Chris Fox
Presented MCTS NEXT Phase 1 update and BRT update and answered questions from the public	Independence First	Local Stakeholder	3/3/2021	Virtual	Chris Fox, Jesus Ochoa, David Locher
Presented MCTS NEXT update for their students	University of Vermont Urban Planning School	Public Information Opportunity	3/5/2021	Virtual	Jesus Ochoa
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	3/9/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT update for their students and employees	MATC	Region-wide Stakeholder	3/11/2021	Virtual	Jeff Sponcia, Jesus Ochoa
Presented MCTS NEXT Phase 1 update and BRT update and answered questions from the stakeholders	Marquette University	Local Stakeholder	3/16/2021	Virtual	Jeff Sponcia, Dan Boehm, David Locher
MCTS NEXT Phase 1 debrief and discussed concerns (Route 19)	ATU 998	Local Stakeholder	3/17/2021	Virtual	Tom Winter, Jeff Sponcia, Josie Willman, David Locher, Melanie Flynn
Presented MCTS NEXT Phase 1 update and answered questions from the stakeholders	Metcalfe Park Neighborhood	Local Stakeholder	3/24/2021	Virtual	Jacqueline Zeledon
Continued MCTS NEXT and BRT outreach	MRMC & SEWRPC	Region-wide Stakeholder	4/5/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
Casual conversation and update on MCTS NEXT, Route 34 specifically, answered questions	Blue Green Alliance	Other	4/16/2021	Virtual	Jeff Sponcia
Presented MCTS NEXT overview and answered questions from attendees	UW-Milwaukee (Transportation Engineering)	Local Stakeholder	4/27/2021	Virtual	Emmanuel Okoro

Presented MCTS NEXT phase 2 overview and answered questions from attendees	Commission for Persons with Disabilities	Local Stakeholder	5/10/2021	Virtual	Jesus Ochoa
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	5/11/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT phase 2 overview and answered questions from attendees	TPAC	Local Stakeholder	5/18/2021	<b>Virtual</b>	Jeff Sponcia
Presented MCTS NEXT phase 2 overview and answered questions from 10 attendees	MCTS	Local Stakeholder	5/26/2021	Virtual	Jacqueline Zeledon, Jeff Sponcia, Jesus Ochoa, Emmanuel Okoro, Chris Fox
Presented MCTS NEXT overview and answered questions from attendees	City of Milwaukee CCTFCTE Transportation & Mobility Workgroup	Local Stakeholder	6/1/2021	Virtual	Jeff Sponcia
Presented MCTS NEXT phase 2 overview and answered questions from 19 attendees	MCTS	Local Stakeholder	6/2/2021	Virtual	Jacqueline Zeledon, Jeff Sponcia, Jesus Ochoa, Emmanuel Okoro, Chris Fox
Presented information on a new series of bus stop requests in the City of Milwaukee as part of MCTS NEXT	City of Milwaukee Public Works Committee	Elected Official	6/3/2021	Virtual	Jeff Sponcia
Presented MCTS NEXT phase 2 overview in Spanish on recorded webinar	MCTS	Local Stakeholder	6/3/2021	Virtual	Jesus Ochoa
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	6/8/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
MCTS NEXT Phase 3 outreach	ATU 998	Local Stakeholder	6/10/2021	Virtual	Tom Winter, Jeff Sponcia, Josie Willman, David Locher, Melanie Flynn
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	7/12/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented information on a new series of bus stop requests in the City of Milwaukee as part of MCTS NEXT	City of Milwaukee Public Works Committee	Elected Official	7/16/2021	Virtual	Jeff Sponcia
MCTS NEXT Phase 2 outreach	Supervisor Sequanna Taylor	Elected Official	8/3/2021	Virtual	Jeff Sponcia, Dan Boehm
Answered questions about MCTS NEXT at Human Resources booth	State Fair	Region-wide Stakeholder	8/6/2021	State Fair	Jeff Sponcia, Matt Sliker, Keeley Gardiner, Jesus Ochoa, Emmanuel Okoro
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	8/10/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT phase 3 overview and answered questions from 15 attendees	MCTS	Local Stakeholder	8/18/2021	Virtual	Jacqueline Zeledon, Jeff Sponcia, Jesus Ochoa, Emmanuel Okoro, Chris Fox
Presented MCTS NEXT phase 3 overview and answered questions from 15 attendees	MCTS	Local Stakeholder	8/25/2021	Virtual	Jacqueline Zeledon, Jeff Sponcia, Jesus Ochoa, Emmanuel Okoro, Chris Fox
Presented MCTS NEXT phase 3 overview in Spanish on recorded webinar	MCTS	Region-wide Stakeholder	8/27/2021	Virtual	Jesus Ochoa

MCTS NEXT Phase 3 outreach	Supervisor Felesia Martin	Elected Official	9/1/2021	Virtual	Jeff Sponcia, Dan Boehm
Answered questions from parents/students on Reagan routes and MCTS NEXT route changes	Ronald Reagan High School	Local Stakeholder	9/1/2021	In-person	Jesus Ochoa
MCTS NEXT Phase 3 outreach	Village of West Milwaukee	Local Stakeholder	9/7/2021	In-person	Jeff Sponcia
MCTS NEXT Phase 3 outreach	Village of Butler	Local Stakeholder	9/7/2021	In-person	David Locher
Continued MCTS NEXT and BRT outreach	MRMC	Region-wide Stakeholder	9/14/2021	Virtual	Jeff Sponcia, David Locher, Tom Winter
Presented MCTS NEXT phase 2 overview and answered questions from attendees	TPAC	Local Stakeholder	9/21/2021	Virtual	Jeff Sponcia
Presented on MCTS NEXT Implementation	WI/MN Public Transit Conference	Region-wide Stakeholder	10/5/2021	Virtual	Jeff Sponcia
North South Enhancement Study Outreach	SEWRPC	Regional Stakeholder	10/28/2021	Virtual Meeting	Jacqueline Zeledon, Jesus Ochoa, Leean Le
Answered questions about new service changes in Supervisor's District	Sup. Rolland	Elected Official	11/18/2021	Virtual Meeting	Tom Winter, Jesus Ochoa

Milwaukee County Transit System - 2022  
Public Outreach and Involvement Activities

Subject Matter	Sponsor	Forum	Date	Location	Attendees
Focus Group Discussion with MRMC employees for direct feedback	MRMC	Local Stakeholder	1/12/2022	Virtual Meeting	David Locher, Jesus Ochoa, Taja Jackson
Answered questions about new service changes in Supervisor's District	Sup. Rolland	Elected Official	1/20/2022	Virtual Meeting	Jesus Ochoa, Tom Winter
Provided transit feedback for their neighborhood plan.	City of Milwaukee	Local Stakeholder	1/31/2022	Virtual Meeting	Jesus Ochoa
West Calumet Bridge Project - Transportation Route Discussion. Provided feedback to stakeholders and public	City of Milwaukee	Local Stakeholder	4/6/2022	Virtual Meeting	Jesus Ochoa, David Locher
Focus Group Discussion with MRMC employees for direct feedback	MRMC	Local Stakeholder	4/29/2022	Virtual Meeting	Jeff Sponcia, David Locher
Presented Fall Service Changes to Public for feedback	MCTS	Local Stakeholder	6/6/2022	Virtual Meeting	Jesus Ochoa, Jacqueline Zeledon, Leean Le, Tom Bertrand

Presented Fall Service Changes to Public for feedback	MCTS	Local Stakeholder	6/8/2022	Virtual Meeting	Jesus Ochoa, Jacqueline Zeledon, Leean Le, Tom Bertrand
Presented Fall Service Changes to Public for feedback	MCTS	Local Stakeholder	6/9/2022	Virtual Meeting	Jesus Ochoa, Jacqueline Zeledon, Leean Le, Tom Bertrand
Presented Fall Service Changes to Public for feedback	MCTS	Local Stakeholder	6/13/2022	Virtual Meeting	Jesus Ochoa, Jacqueline Zeledon, Leean Le, Tom Bertrand
Presented North South Transit Enhancement Study and answered questions.	Sup Shea	Elected Official	6/23/2022	Virtual Meeting	Jesus Ochoa, Tom Winter
Presented Fall Service Changes for feedback	TPAC	Local Stakeholder	7/19/2022	Virtual Meeting	Jesus Ochoa, Lisa Walters
Met with Village of Greendale on how to better serve their residents.	Village of Greendale	Elected Official	8/8/2022	Greendale Village Hall	Jesus Ochoa
Met with senior living facility on how to better serve their residents.	Westridge Senior Center	Elected Official	8/25/2022	Westridge Senior Apartments	Jesus Ochoa
Met with senior living facility management on logistics to serve their residents.	Westridge Senior Center	Elected Official	9/16/2022	Westridge Senior Apartments	Jesus Ochoa, Tom Winter
Presented on transit to University Students	Alverno College	Local Stakeholder	10/12/2022	Alverno College	Jesus Ochoa
Tabled at Latino Family Expo and answered public questions	MCTS	Local Stakeholder	10/29/2022	St. Augustine Prep High School	Jesus Ochoa, Tiffany Moore
Presented Transit Planning Practices at Teen Advisory Board Meeting.	MCTS	Local Stakeholder	11/2/2022	MCTS Admin Building.	Jesus Ochoa, Emmanuel Okoro

2023

# Milwaukee County Transit System

- Limited English Proficiency Plan



MCTS

1/1/2023

# Milwaukee County Transit System

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# 2023 Limited English Proficiency Plan

## I. Introduction

Per FTA Circular 4702.1B, “Title VI and Title VI-Dependent Guidelines for FTA Recipients”, the Federal Transit Administration (FTA) requires that recipients and sub-recipients of federal funding take responsible steps to ensure that persons with limited English proficiency (LEP) are afforded meaningful access to services, programs, and activities.

This document provides details of an extensive effort undertaken by the Milwaukee County Transit System for ensuring meaningful access to public transportation for those individuals who have limited English-speaking skills. It includes a language assistance plan to guide implementation efforts for the LEP population.

## II. Relevant Guidance

Throughout the preparation of this plan, several resources were referenced in order to ensure compliance and development of a comprehensive plan. Some of the resources utilized are listed below.

<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/about-limited-english-proficiency-lep>

U.S. Department of Transportation Civil Rights, Limited English Proficiency

<https://www.federalregister.gov/documents/2005/12/14/05-23972/policy-guidance-concerning-recipients-responsibilities-to-limited-english-proficient-lep-persons>

Federal Register, U.S. Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons

<https://portal.ct.gov/DPH/Workforce--Professional-Development/Office-of-Health-Equity/I-SPEAK-Cards>

Printable version of US Census “I Speak Cards”

[https://dwd.wisconsin.gov/wioa/doc/Civil\\_Rights\\_Compliance\\_Guide.docx](https://dwd.wisconsin.gov/wioa/doc/Civil_Rights_Compliance_Guide.docx)

Civil Rights Guide

## III. LEP Needs Assessment: Four-Factor Analysis

The Title VI Plan submitted in 2020 contained a plan for conducting the four-factor analysis to assist in understanding and addressing the needs of the LEP population. This comprehensive analysis was initiated in 2009 and updated to its present form in 2023. The following information outlines the progress of that analysis and presents the findings that resulted:

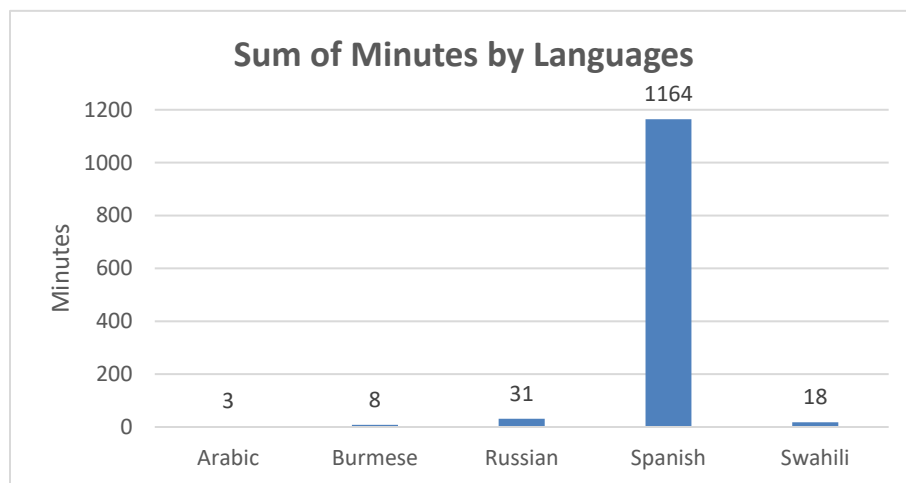


## A. FACTOR 1: The number or proportion of LEP persons eligible to be served likely to be served by the program or recipient.

### a) How LEP persons interact with the recipient's agency

MCTS researched and reviewed information kept by MCTS on past interactions with members of the public who are LEP. This included an analysis to determine the extent to which LEP persons have come into contact with the various departments of MCTS.

**Results:** *The analysis of past contact examined several areas of customer contact including Customer Service phone line and reception, Paratransit Office, and Dispatch. All areas reported Spanish as the primary language used by LEP customers. Below is a graph of our Foreign Language Interpretation Service Usage reporting from Certified Languages International (January 1st, 2020, through December 31st, 2022).*

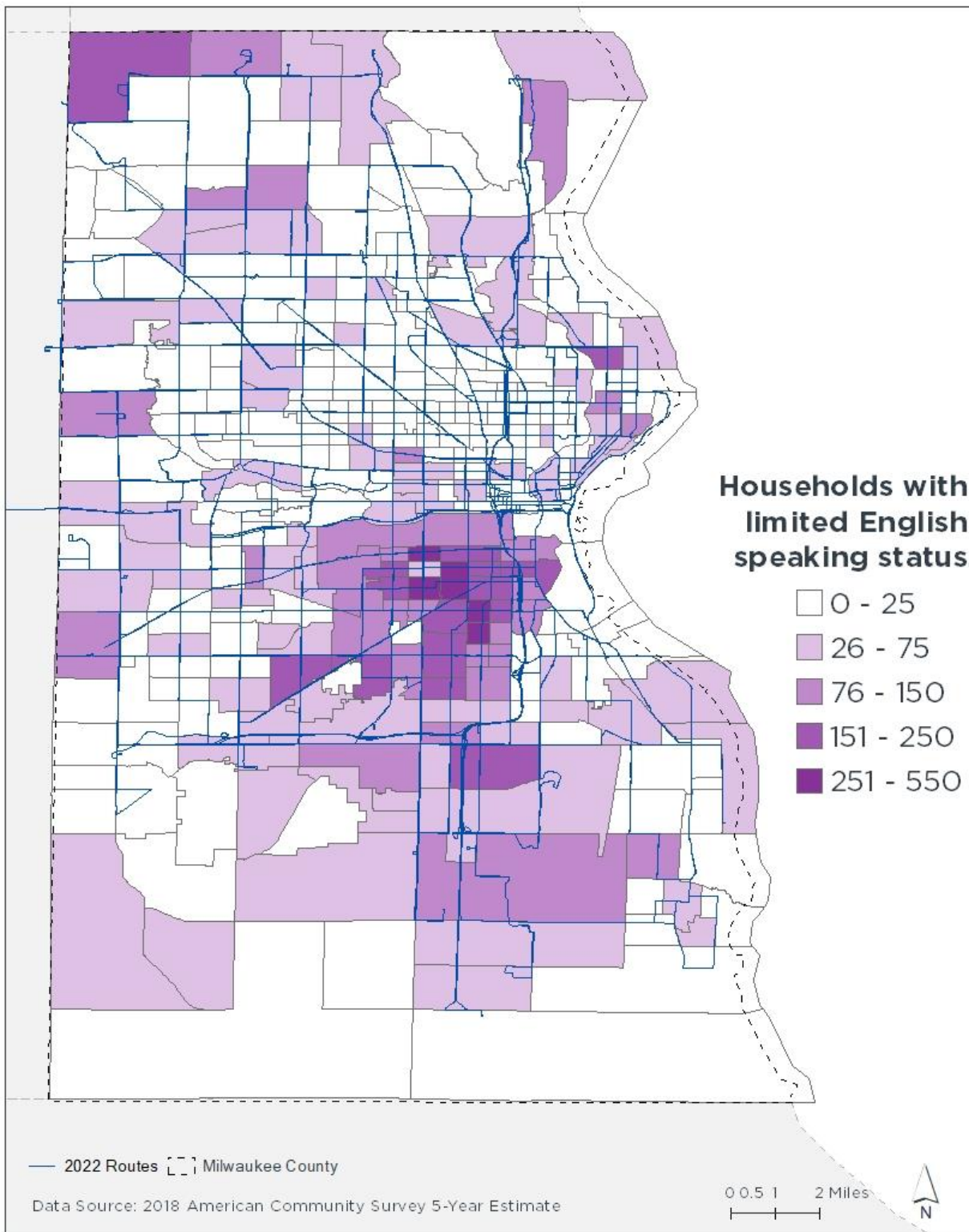


**b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language**

**Results:** Below is a map of that identifies LEP households in the MCTS Service Area (Milwaukee County). All MCTS-related customer information signage inside the bus is translated into Spanish on our entire fleet of buses, so whichever bus is assigned to a route that serves a predominantly Spanish-speaking area, the customers will be able to understand important rider information. See the table on Page 6 for the list of most prevalent LEP spoken languages in Milwaukee County.

The map was generated with ESRI's ArcMap using a 5-year estimate from the American Community Survey from 2018. MCTS' Planning Department also frequently uses Remix Transit Planning software to effectively analyze transit service provision to all population groups as it displays various Census Data layers, ridership data and other pertinent information underneath the system's route traces. The software also allows Planners the ability to draw new routes or extensions and it instantly calculates the costs and relevant schedule data of the new service. The use of Remix in our Public Participation efforts to LEP populations has enhanced our ability to effectively communicate service change information and provides the opportunity for MCTS to efficiently cost-out any service changes within these communities.

### Limited English Proficiency Households in Milwaukee County



**Languages Spoken at Home and Ability to Speak English in Milwaukee County, WI  
2018 American Community Survey – 5-Year Estimate – Table B16002**

Household Language	Households	% of Total Households	% of Total Limited English-Speaking Households
<b>Total Households</b>	384,281	100.00%	-
<b>English only</b>	316,195	82.28%	-
<b>Speak a language other than English</b>	68,086	17.72%	-
<b>Limited English-Speaking Households</b>	13,451	3.50%	100.00%
<b>Spanish</b>	41,569	10.82%	66.57%
<b>French, Haitian, or Cajun</b>	1,641	0.43%	0.26%
<b>German or other West Germanic languages</b>	2,175	0.57%	0.97%
<b>Russian, Polish, or other Slavic languages</b>	4,731	1.23%	8.85%
<b>Other Indo-European languages</b>	5,245	1.36%	7.17%
<b>Korean</b>	362	0.09%	0.39%
<b>Chinese (incl. Mandarin, Cantonese)</b>	1,536	0.40%	3.69%
<b>Vietnamese</b>	365	0.09%	0.57%
<b>Tagalog (incl. Filipino)</b>	636	0.17%	0.00%
<b>Other Asian and Pacific Island languages (incl. Hmong)</b>	5,266	1.37%	9.23%
<b>Arabic</b>	2,443	0.64%	0.82%
<b>Other and unspecified languages</b>	2,117	0.55%	1.49%

**c): The literacy skills of LEP population in their native languages, in order to determine whether translation of documents will be an effective practice**

Spanish is the dominant LEP language in Milwaukee County. Various MCTS signs and forms exist both on the MCTS website and on MCTS buses. More details are provided in Factor 3, Part A.

**d) Whether LEP persons are underserved by the recipient due to language barriers**

**Results:** *Bilingual employees in the Marketing Department gave presentations and/or were available to answer questions at the following community events:*

- *Annual Puerto Rican Festival*

- *Ciclovía Neighborhood Block Party*
- *Latino Expo & Festival*

*The Planning Department also gave presentations and was available to answer questions at the following events:*

- *Hispanic Community Event Collaboration*
- *Latino Family Expo*
- *Service Change Public Meetings*

## **B. FACTOR 2: The frequency with which LEP persons come into contact with the program.**

### **a) MCTS Employee Interactions**

MCTS conducted informal e-mail interviews with members from each department that comes in contact with LEP persons. Here is what we learned:

***PARATRANSIT:*** *Since 2017, both the Transit Plus and Reduced Fare applications have been made available in Spanish and are located on the MCTS website to download and print. Also, Paratransit works with ABLE (Audio & Braille Literacy Enhancement) to create documents in Braille or large print upon request. The Transit Plus Riders Guide is also available in audio format on the website.*

***PARATRANSIT (Mobility Management Team):*** *Paratransit (Mobile Mobility Management Team) holds Travel Training sessions at the International Institute of Wisconsin (IIW) and Lutheran Social Services (LSS) to teach newly arrived refugees how to ride the bus. MCTS is currently working with IIW to develop ADA Sensitivity Training written materials for Driver Training Sessions.*

*The Mobility Management Team has a Spanish version of their Freedom on Wheels PowerPoint presentation available upon request.*

*Transit Plus eligibility assessors and clerks utilize the Certified Languages International translation service on their phones for assessment related tasks.*

*Additionally, the Mobility Management team has conducted community outreach at the following locations:*

- *United Community Center (UCC)*
- *International Learning Center (ILC)*
- *A.L.A.S. (Alianza Latina Aplicando Soluciones) Resource Center*
- *Refugee Health Services*

- *High Schools including: Washington High School ESL, Milwaukee School of Languages, and South Division High School (more than half the student population are Spanish speaking), Escuela Verde High School*
- *Hosted an Information Booth at World Refugee Day*

***DISPATCH:*** *When an operator needs to interact with a Spanish-speaking LEP person, they call Dispatch for assistance. Personnel will use a translation app to best meet the needs of riders. No other accommodation is available at this time.*

***HUMAN RESOURCES:*** *Job applications are not offered in any other language as applicants are advised they must be able to read, write and speak fluent English.*

***CUSTOMER SERVICE & RECEPTION AREA:*** *Milwaukee County Transit System's Customer Service Department has the ability to assist callers with limited English language proficiency by working with the Certified Languages International. This company has access to telephonic interpreters of over 200 languages, free of charge to MCTS customers, at the MCTS Administration building and both Fond du Lac and Kinnickinnic Stations. Each year the need for translation services varies and, since 2022, the department has averaged 35 calls annually. Most often, a Spanish-speaking interpreter is requested, but this department has received customer service inquiries in Hmong, Japanese, Russian, Swahili and Lao. Having the interpretation service at their disposal is a great comfort to the Customer Service staff.*

*The Administrative building receptionist estimates interactions with 25 LEP customers who need assistance each year. The receptionist transfers them to Customer Service if it's a phone call. At times, the receptionist has asked a Spanish-speaking MCTS Administration employee to assist with Spanish-speaking customers. These requests are just a handful each year and the MCTS employees are always willing and happy to help.*

***MARKETING:*** *MCTS Marketing and Planning departments collaborate on hosting community meetings every quarter. These meetings are primarily to inform the public about potential route changes and to solicit community feedback. During the pandemic, a majority of these meetings were conducted via Zoom. Spanish is the second most spoken language in MCTS' service area after English. MCTS has a Spanish-speaking employee on hand during the meetings. In addition, MCTS has conducted special community Zoom sessions in Spanish which were promoted to the Spanish Speaking Community. Other times, MCTS translates the presentation into Spanish and provides a link. When we have in-person meetings, we also have a Spanish speaker at the event.*

*MCTS Marketing also produces ad campaigns, radio ads, printed advertising on bus shelters and online advertising in Spanish. In addition, Spanish speaker for*

*various PR opportunities so our news can be shared via the local Telemundo affiliate TV station, which is a Spanish Language news channel.*

*Once a year MCTS prints a special double issue (English/Spanish) of our on-board newsletter, “Bus Lines.”*

### **C. FACTOR 3: The nature and importance of the program, activity or service provided by the program to people’s lives.**

#### **a) Identify MCTS’ most critical services**

MCTS reviewed and identified programs and activities that would have serious consequences to individuals if language barriers prevented a person from benefiting from the activity. The impact on actual and potential beneficiaries of delays in the provision of LEP services was also considered.

**Results:** *MCTS has made significant strides in providing critical services to LEP persons.*

*For quarterly service changes, MCTS announces English and Spanish versions of Public Service Announcements (PSAs) about those changes. These announcements are primarily made on the impacted routes. Whenever we have a very important PSA (like Coronavirus), we also translate it into a Spanish language version. For important route updates, we’ve provided information in English and Spanish on signs, newsletters and our website, RideMCTS.com.*

*MCTS’ website is now equipped with a Google widget that can translate all text on the website into any language offered by Google Translate. The mobile app supports 14 languages, including Portuguese, Spanish, and Español (Latino América). In addition, MCTS has translated all signage on buses into Spanish to aid LEP individuals. A variety of the translated signs are listed below.*

*Knowing how to ride the bus, including:*

- *How to know which bus to take;*
- *How to pay the fare;*
- *Where to buy tickets/passes, and;*
- *Accessibility issues.*

*Access to informational materials and services such as:*

- *Route guides and schedules;*
- *Contacting MCTS by phone;*
- *Customer Service call centers including TTY;*

- *Transit Guide containing overall system map, how to ride the bus and how to read a route guide information, and;*
- *Important route updates offered through passenger announcements, website, signs, and newsletter.*

*Security Measures:*

- *Importance of reporting problems on the bus to the bus operator.*

*Knowledge of the rules for riders including:*

- *Passenger rules of conduct which includes both passenger rights and responsibilities, and;*
- *What is not allowed on buses – no open food or beverage, no loud music or cell phone usage, no littering.*

## **b) Review input from community organizations and LEP persons**

**Results:** *Beginning with our MCTS NEXT Public Engagement process and working with community stakeholders like Layton Boulevard West Neighbors, Clark Square Neighborhood Initiative and Sixteenth Street Community Health Center, MCTS has been able to provide more meaningful access to LEP persons based on the feedback we've received from these organizations. Their input helped shape how we disseminated information about our Route Redesign project throughout the community, including LEP neighborhoods on the near South Side. These stakeholders worked side-by-side along with MCTS' Planning and Marketing Departments to host our first-ever Spanish Language Open House at which we gave a presentation in Spanish detailing all aspects of MCTS NEXT. Planners and our stakeholder partners were available at the meeting to answer questions from attendees in Spanish and English. A review of the MCTS NEXT Project included public meetings opportunities for LEP populations with meetings held in targeted areas and Spanish videos recordings available on our website.*

*MCTS continues to seek input from community organizations and LEP persons. Here are our most recent actions based on community input.*

- *Printed schedules are a primary source of information and yet pose a consistent obstacle for LEP persons.*
- *To make the website more accessible to non-English speakers, when it was redesigned, Google Translate was added to the navigation section of the RideMCTS.com.*
- *Have more commonly used forms and materials available and accessible.*



**D. FACTOR 4: The resources available to the recipient for LEP research, as well as the associated costs associated with that outreach.**

**a) Inventory language assistance measures currently being provided, along with associated costs**

**Results:** *MCTS continues to maintain production of several Spanish-language information items for distribution to our Spanish-speaking riders. These include:*

- *On board Passenger Rights – Cost approximately \$900*
- *On board Passenger Fares – Cost approximately \$900*
- *On board decals of safety information and rules of the bus – Collaborative piece – no specific costs*
- *Mobile app “how to” videos have a Spanish language version.*
- *Bus Lines quarterly on-board newsletter – translated into Spanish.*
- *On-board audio Public Service Announcements are broadcast on our buses; Spanish version plays directly after the English version.*

**b) Determine what, if any, additional services are needed to provide meaningful access**

**Results:** *The following items should be addressed to improve access to our programs and activities:*

- *Provide Spanish-language ads on Routes Guides to announce the availability of the Spanish-language How to Ride Guide;*
- *Distribute Spanish-language How to Ride Guide to additional locations.*
- *Provide information to community partners/organizations that serve LEP populations to help distribute and gather feedback.*

**c) Analyze our budget**

**Results:** *Based upon MCTS’ experience with LEP populations, it is determined that base level measures, such as document translations, must be in place for the Spanish-speaking population. Converting English documents to Spanish costs between \$80-150 per one sheet. Additional budgetary resources may be needed in the event that demand occurs among other LEP population groups.*

**d) Consider cost-effective practices for providing language services**

**Results:** *As stated in section Factor 1 Part A, in November 2013, MCTS implemented Certified Languages International to service all foreign language interpretation needs. Their agents are available 24 hours a day, seven days a*

*week in virtually any language in the world. Spanish-speaking translation services cost \$0.99 per minute while all other languages cost \$1.45 per minute. Implementing this service across all departments within the organization has increased our level of customer service proficiency, especially to Milwaukee County's growing Spanish-speaking population. Our professionalism and image in the community have improved because we are no longer turning away limited English speakers—we now have a resource to help us communicate with every single customer.*

## IV. Language Assistance Plan

MCTS has implemented several key aspects into the culture of this organization that place importance on serving Milwaukee County's limited English proficiency populations. With initiatives like the Foreign Language Interpretation Service, the implementation of Remix Transit Planning software and participation in various community-related events, MCTS continues to refine and improve its service to LEP populations by taking the following measures:

### a) Language Assistance Measures

*MCTS will develop instructions for all front-line employees (Paratransit, Human Resources, Marketing, Bus Operators, Route Supervisors and Customer Service staff) who regularly interacts with the public, about how to effectively respond to and interact with an LEP individual.*

### b) Staff Training

*The Department of Transportation recommends the agency inform staff about LEP policies and procedures and that staff who interact with LEP individuals receive proper training to accommodate in-person and telephone requests from such people. Those who lack proficiency in English are sometimes unable to obtain knowledge on how to access various MCTS services. The goal is to improve our level of service to all riders so that no LEP person is turned away from receiving quality customer service.*

*MCTS uses documents developed by the FTA Office of Civil Rights, available at <https://www.transit.dot.gov/title6>*

*Other resources include:*  
[www.lep.gov](http://www.lep.gov)

*“How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision making,” available at:*

[https://www.fhwa.dot.gov/planning/publications/low\\_limited/index.cfm](https://www.fhwa.dot.gov/planning/publications/low_limited/index.cfm)

### **c) Providing Notice to LEP Persons**

*MCTS determined there was a need for including outreach documents to be sent to community organizations, local media, schools, places of worship, RideMCTS.com and in MCTS staff training materials. MCTS even hosted several stakeholder meetings that catered to public entities such as the ones listed above.*

### **d) Monitoring and Updating the Plan**

*MCTS recognizes that, to achieve success, there must be a base level of awareness throughout the organization regarding LEP and Title VI goals and responsibilities. Employee education and awareness will evolve, and so may the LEP needs. That is why regular monitoring and updating of the LEP needs and measures employed will be necessary. MCTS is intent on carrying out and improving this plan designed to ensure that all individuals can benefit from the services provided.*

## **V. Current Measures**

MCTS has already successfully incorporated a variety of strategies for meeting the needs of LEP individuals in the service area including the following:

- *Document Translations:*
  - *For MCTS NEXT, an informational handout and presentation boards were translated into Spanish.*
  - *A Spanish language link was provided for MCTS NEXT on RideMCTS.com.*
  - *MCTS’ website www.RideMCTS.com is available in dozens of languages, powered by Google Translate.*
  - *In-person translation – When an individual contacts MCTS with a request in Spanish, there are designated employees at various work areas who will assist with the request during office hours.*
  - *Bilingual Instructions – MCTS updated its Passenger Rights and Responsibilities bilingual (English and Spanish) interior ad cards.*

- *Bilingual instruction cards were made to describe how to use the Ride MCTS mobile app.*
- *A bilingual table rate sign for use at public events.*
- *Title VI Policy: Statement of policy and procedures for making a Title VI complaint is printed in English and Spanish onboard buses and in the overall Transit Guide*
- *Marketing translated and printed brochures related to the transition to paperless fares and distributed them on routes serving high-density LEP populations.*
- *Public Presentations:*
  - *For community events, we have at least one bilingual MCTS representative to deliver information, give demonstrations and/or answer questions.*
  - *Current Planning Manager is bilingual in English and Spanish and is available to translate in Spanish at any time/event as needed.*

MCTS will monitor the demand for services by LEP populations and use this plan as a working guide. Updates to this plan will be made as needed.

**Milwaukee County Transit System  
Inter-Office Memorandum**

To: File

From: Jesus Ochoa, Planning Manager

Re: **Title VI - Minority Representation on Planning and Advisory Bodies**

Date: April 10, 2022

The Transit Plus Advisory Committee (TPAC) is an MCTS advisory committee that is comprised of non-elected members. Members are selected by officials on the Milwaukee County Board of Supervisors.

A list of the survey questions used to query members about their racial identity and/or ethnicity, a table depicting the racial breakdown of the committee, as well as efforts to encourage participation of minorities on those committees are shown below.

**Questionnaire:**

By self-identification, what is your ethnicity (cultural or national origin) and/or race? (You may choose to report more than one race to indicate racial mixture.)

- **Hispanic, Latino, or Spanish Origin**  
A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- **White**  
A person having origins in any of the original peoples of Europe, the Middle East or North Africa.
- **Black or African-American**  
A person having origins in any of the black racial groups of Africa.
- **Native Hawaiian or other Pacific Islander**  
A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **American Indian or Alaska Native**  
A person having origins in any of the original people of the North and South American Continent (including Central America), and who maintain tribal affiliation or community attachment.
- **Asian**  
A person having origins in any of the original people of the Far East, Southeast Asia, or the Indian Subcontinent, including for example, Cambodia, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand or Vietnam.

**Table 1: Racial Breakdown of the Membership of Advisory Committees**

	Transit Plus Advisory Committee
Approved Membership Positions	10
Filled Membership Positions	10
Members Completing Survey	10
Hispanic, Latino, or Spanish Origin	0
White	5
Black or African-American	3
Native Hawaiian or other Pacific Islander	0
American Indian or Alaska Native	1
Asian	1



DEPARTMENT OF TRANSPORTATION  
*Milwaukee County*

Donna Brown-Martin, Director and Highway Commissioner

**DATE:** June 9, 2023  
**TO:** Tom Winter, Director, Department of Service Development, MCTS  
**FROM:** John Rodgers, Senior Grants Compliance Manager, MCDOT  
**SUBJECT:** Milwaukee County Monitoring of Subrecipient Title VI Programs for the Federal Transit Administration Section 5310 Program within the Milwaukee Urbanized Area.

BACKGROUND

On December 4, 2015, the current federal transportation authorization legislation Fixing America's Surface Transportation Act (FAST Act) was signed into law and continues the Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310 Program) authorized under the previous federal transportation authorization legislation – Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21).

The Section 5310 Program provides federal funds to help eligible entities purchase vehicles and other capital items to transport seniors and people with disabilities, as well as to expand transportation mobility options for persons with disabilities. These funds can be used for operating or capital assistance, and are available to private non-profits or government agencies.

Milwaukee County is the sole designated recipient for the Section 5310 Program funds in the Milwaukee urbanized area that includes Ozaukee, Washington and Waukesha Counties. As the designated recipient, Milwaukee County is responsible for administering grant agreements, monitoring compliance of subrecipients applying for federal funds, and satisfying documentation and reporting requirements to the Federal Transit Administration (FTA).

Recipients of the Milwaukee urbanized area's Section 5310 Program funds are required to meet civil rights requirements under Title VI, as well as Equal Employment Opportunity (EEO) and Disadvantaged Business Enterprise (DBE) regulations.

***Title VI***

The elements of a Title VI Program are determined by FTA Circular 4702.1B (Appendix A) and include, but are not limited to:

- Title VI notice to the public, including a list of locations where the notice is posted
- Title VI complaint procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint) and Title VI complaint form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public participation plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission

- Language Assistance Plan for providing language assistance to persons with limited English proficiency
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

The Milwaukee County Transit System prepares a Title VI Program Update for submission to the FTA every three years. Similarly, Section 5310 Program subrecipients must submit their Title VI Programs to Milwaukee County on a triennial basis. A subrecipient's Title VI program must be approved by the subrecipient's appropriate governing entity or official(s) responsible for policy decisions (e.g., board of directors, mayor, tribal executive, city administrator, etc.). Subrecipients may submit a copy of the board resolution, meeting minutes, or similar documentation as evidence of approval.

Contractors and subcontractors are not required to submit a Title VI report. However, they are responsible for complying with the Title VI Program of the recipient with whom they are contracting. Recipients and subrecipients are responsible for ensuring that their contractors are complying with their Title VI Program and Title VI regulations.

Milwaukee County is available to assist subrecipients with Title VI compliance. Milwaukee County provides sample notifications, forms, and program language to subrecipients upon request. Milwaukee County oversees subrecipient compliance with Title VI as follows:

- **Grant Agreements** – Through grant agreements, the subrecipient agrees to comply with applicable civil rights statutes and regulations, including Title VI of the Civil Rights Act, Equal Employment Opportunity (EEO), and Disadvantaged Business Enterprise (DBE). As subrecipients to Milwaukee County, Section 5310 Program subrecipients must comply with the FTA's Annual List of Certifications and Assurances signed annually by Milwaukee County.
- **Review of Subrecipient's Title VI Program** – Milwaukee County reviews the contents of Title VI Program materials as submitted by subrecipients, including public notification language, LEP, complaint procedures and complaint form, and public participation and outreach.
- **Investigation and Monitoring of Title VI Complaints (or potential complaints and/or lawsuits)** – Milwaukee County requires subrecipients to report any Title VI complaints or lawsuits. Subrecipients may contact Milwaukee County at any time during the year to report Title VI complaints, potential complaints, and/or lawsuits. Milwaukee County may also receive complaints regarding subrecipients or their contractors directly from the public.
- **On-Site Visits** – Milwaukee County staff conducts on-site visits as necessary to monitor subrecipient compliance. During on-site visits, staff will verify the location of the public notification language as stated in the subrecipient's Title VI Program. During this time, staff may also discuss with the subrecipient any new or potential opportunities for public participation and public outreach that may present themselves since the previous submission of the subrecipient's Title VI Program.

Prepared by:

  
 John Rodgers  
 Senior Grants Compliance Manager  
 Milwaukee County Department of Transportation



## COUNTY OF MILWAUKEE

### Inter-office Communication

DATE: 6/16/2023  
TO: Marcelia Nicholson, Chair, County Board of Supervisors  
FROM: Donna Brown-Martin, Director, Department of Transportation  
SUBJECT: Resolution Approving of the Milwaukee County Transit System (MCTS) 2023 Title VI Program Plan Update  
FILE TYPE: Resolution

#### REQUEST

Authorize the Milwaukee County Department of Transportation to submit the MCTS 2023 Title VI Program Plan Update to the Federal Transit Administration.

#### POLICY

Title VI of the Civil Rights Act of 1964 states: "No person in the United States shall, on the ground 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.

#### BACKGROUND

The Federal Transit Administration (FTA) requires transit providers prepare a Title VI Program Plan Update every three years to document compliance. The purpose of the Plan Update is to ensure that transit services are provided in a non-discriminatory manner, to promote full and fair participation in transit decision-making without regard to race, color, or national origin, and to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

As a recipient of FTA funds, MCTS must document the Plan Update has been approved by the County Executive and County Board of Supervisors prior to the submittal deadline of October 1, 2023.

The Milwaukee County Department of Transportation will submit the Plan Update on behalf of MCTS. The document is available at <https://www.ridemcts.com/accessibility/title-vi>

The Plan Update is required to include the following content:

- Notice to the Public, Complaint Procedures and Form, and a Summary of Complaints
- Public Participation Plan and Public Outreach & Involvement Activities
- Limited English Proficiency Plan
- Minority Representation on Planning and Advisory Bodies
- Monitoring of Sub-recipient Title VI programs
- Approval of Title VI Program by the Governing Entity
- Definitions of Major Service Changes, Disparate Impact, and Disproportionate Burden
- Service Standards / Policies and Demographic data on minority / low-income populations
- Service and Fare Equity Analyses of major service changes

Finally, it should be noted these actions are consistent with and relevant to Milwaukee County General Ordinance Chapter 108 Achieving Racial Equity and Health.

#### ALIGNMENT TO STRATEGIC PLAN

Describe how the item aligns to the strategic plan:

2A: Determine what, where, and how we deliver services to advance health equity.

2C: Apply a racial equity lens to all decisions.

3A: Invest “upstream” to address root causes of health disparities.

3C: Dismantle barriers to diverse and inclusive communities.

#### RECOMMENDATION

Approve the resolution to authorize the Milwaukee County Department of Transportation to submit the MCTS 2023 Title VI Program Plan Update to the Federal Transit Administration prior to the October 1, 2023 deadline.

#### FISCAL EFFECT

There is no fiscal impact to approving this resolution.

#### VIRTUAL MEETING INVITES

Tom Winter ([twinter@mcts.org](mailto:twinter@mcts.org)) and Jesus Ochoa ([jochoa@mcts.org](mailto:jochoa@mcts.org))

#### PREPARED BY:

Tom Winter, Director, Service Development Department

Jesus Ochoa, Planning Manager, Service Development Department

#### APPROVED BY:

---

Donna Brown-Martin  
Director, Department of Transportation

#### ATTACHMENTS:

Resolution and Fiscal Note. The 2023 MCTS Title VI Program Plan Update is available at <https://www.ridemcts.com/accessibility/title-vi>

cc: Kelly Bablitch, Chief of Staff, County Board of Supervisors  
Janelle M. Jensen, Legislative Services Division Manager, Office of the County Clerk

1 (Item ) From the Director, Department of Transportation and the Managing Director,  
2 Milwaukee County Transit System, requesting approval of the Milwaukee County  
3 Transit System (MCTS) 2023 Title VI Program Plan Update.  
4

5 **A RESOLUTION**  
6  
7

8 WHEREAS, Title VI of the Civil Rights Act of 1964 states: “No person in the  
9 United States shall, on the ground of race, color, or national origin, be excluded from  
10 participation in, be denied the benefits of, or be subjected to discrimination under any  
11 program or activity receiving federal financial assistance;” and  
12

13 WHEREAS; the Federal Transit Administration (FTA) requires transit providers  
14 prepare a Title VI Program Plan Update every three years to document compliance; and  
15

16 WHEREAS; the purpose of the Plan is to ensure that transit services are  
17 provided in a non-discriminatory manner, to promote full and fair participation in transit  
18 decision-making without regard to race, color, or national origin, and to ensure  
19 meaningful access to transit-related programs and activities by persons with limited  
20 English proficiency; and  
21

22 WHEREAS; the FTA requires approval of the Title VI Program Plan Update by  
23 the County Executive and the County Board of Supervisors prior to the submittal  
24 deadline of October 1, 2023; now, therefore,  
25

26 BE IT RESOLVED, The MCTS 2023 Title VI Update (available at  
27 <http://www.ridemcts.com/about-us/title-vi-policy>) is approved and Milwaukee County  
28 Department of Transportation is authorized to submit the approved plan to the FTA.

**COUNTY OF MILWAUKEE  
INTEROFFICE COMMUNICATION**

**DATE:** June 23, 2014

**TO:** Michael Mayo, Sr., Chairperson, Transportation, Public Works and Transit Committee

**FROM:** Brian Dranzik, Director, Department of Transportation

**SUBJECT:** Resolution Approving of Milwaukee County Transit System (MCTS) Title VI Policy Definitions for Major Service Change, Disparate Impact, and Disproportionate Burden

**POLICY**

Title VI of the Civil Rights Act of 1964 states: “No person in the United States shall, on the ground 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.”

Title VI is codified under U.S. Department of Transportation Regulations (49 CFR part 21). The Federal Transit Administration (FTA) establishes requirements for transit systems with respect to Title VI under FTA Circular 4702.1B; Chapter IV, Section 3a (2)(e) of which establishes a requirement for board approval of Title VI policy definitions for major service change and disparate impact used by a transit system.

**BACKGROUND**

The FTA requires transit systems to analyze proposed service changes and fare changes to determine if there is potential for a disparate impact on minority populations or a disproportionate burden on low-income populations. Disparate impacts and disproportionate burdens are to be considered, and mitigated as possible. Prior to performing the required analysis, it is necessary to establish local policy definitions for “major service change,” “disparate impact” and “disproportionate burden.”

The FTA requires transit systems to use a public engagement process when establishing these local definitions. Furthermore, the FTA requires the Milwaukee County Transit System (MCTS) to obtain County Executive and County Board approval of major service change and disparate impact policy definitions.

In October 2013, MCTS conducted two public outreach meetings to inform the public of proposed policy definitions and gather input about the policies. Meetings were held at the Center Street Library and at the Downtown Central Library. About 90 persons from the community attended these meetings. Based on the feedback received from the public, MCTS recommends the following policy definitions for approval by the County Executive and County Board.

## MAJOR SERVICE CHANGE POLICY

A Major Service Change is defined as a change that:

- Affects 25 percent of the in-service bus hours on a route or group of routes,
- Affects 25 percent of the one-way mileage of a route or group of routes,
- Affects 25 percent of the daily service period,
- Reduces the service span by more than an hour during the late night (930 pm to 6 am)
- Reduces the frequency of service (increases the headway) by 50 percent, and
- Creates a gap of greater than one-half mile from the nearest alternative service.

## DISPARATE IMPACT POLICY / DISPROPORTIONATE BURDEN POLICY

MCTS uses the four-fifths rule, also known as the 80 percent rule, as the threshold for its disparate impact and disproportionate burden policies. Specifically, an impact has occurred when the ratio of the reduction in service to the minority or low-income population compared to the non-minority or non-low-income population exceeds four/fifths or 80 percent. The four-fifths rule is a commonly accepted measure used by many transit systems.

## RECOMMENDATION

Approve the resolution defining the MCTS major service change policy and disparate impact policy.

Prepared by: Tom Winter, Director of Schedule and Planning, MCTS  
Daniel Boehm, Interim Managing Director, MCTS

Approved by:

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Brian Dranzik  
Director, Department of Transportation

cc: Chris Abele, Milwaukee County Executive  
Marina Dimitrijevic, Chairwoman, County Board of Supervisors  
Kelly Bablitch, Chief of Staff, County Board of Supervisors  
Raisa Koltun, Interim Chief of Staff, Milwaukee County Executive Office  
John Zapfel, Deputy Chief of Staff, Milwaukee County Executive Office  
Don Tyler, Director, Department of Administrative Services  
Josh Fudge, Fiscal and Budget Administrator, Department of Administrative Services  
Anthony Geiger, Fiscal and Budget Analyst, Department of Administrative Services

## **Chapter IV**

# **PUBLIC TRANSIT SERVICE OBJECTIVES AND STANDARDS**

### **INTRODUCTION**

One of the critical steps in the preparation of a transit system development plan is the articulation of the objectives to be served by the transit system, together with the identification of supporting standards that can be used to measure the degree of attainment of the objectives. The objectives and standards provide the basis for assessing the performance of the existing transit system, identifying unmet transit service needs, designing and evaluating alternative transit system plans, and recommending service changes and improvements. The objectives and standards formulated under this study are intended to represent the level of transit performance desired by Milwaukee County.

This chapter presents the public transit service objectives, principles, and standards that were formulated and applied under the County's transit system development plan. The objectives and supporting standards set forth in this chapter may also be used by the County to guide in the design, operation, and review of its transit services after completion of this planning effort.

### **OBJECTIVES**

The transit service objectives, principles, and standards set forth in this chapter are intended to reflect the underlying values of the elected officials and residents of Milwaukee County. One of the important functions of the Milwaukee County Public Transit Planning Advisory Committee was to articulate transit service objectives, principles, and supporting standards for the planning effort. By drawing upon the collective knowledge, experience, views, and values of the members of the Committee, it is believed that a meaningful expression of the performance desired for the Milwaukee County Transit System was obtained, and a relevant set of transit service objectives and supporting principles and standards was defined.

The specific objectives adopted envision a transit system that will effectively serve transit travel by Milwaukee County residents both within the County and between the County and other adjacent communities in the Milwaukee urbanized area. More specifically, the following objectives were adopted by the Advisory Committee:

1. The public transit system should effectively serve the existing land use pattern and support the implementation of planned land uses, meeting the demand and need for transit services, and particularly the needs of the transit-dependent population;

2. The transit system should promote effective utilization of transit service and operate service that is reliable and provides for user convenience and comfort;
3. The transit system should promote the safety and security of its passengers, operating equipment and facilities, and personnel;
4. The public transit system should promote efficiency in the total transportation system; and
5. The public transit system should be economical and efficient, meeting all other objectives at the lowest possible cost.

## **PRINCIPLES AND STANDARDS**

Complementing each of the foregoing transit service objectives is a planning principle and two sets of service standards, as set forth in Table 32. The planning principle supports each objective by asserting its validity. Each set of standards is directly related to the transit service objective and serves several purposes. The service design and operating standards are intended to primarily provide guidelines for the design of new and improved services, the operation of the transit system, and the acquisition of capital equipment and construction of facilities. The service performance standards primarily facilitate the evaluation of the performance of the existing transit system and of alternative service improvements. For each performance standard, one or more criteria are identified which can be used to quantify the performance of the transit service for measurement against the standard.

The performance evaluation of the existing transit system undertaken for the current study included assessments of transit performance on both a systemwide basis and on an individual route basis. The performance standards set forth in Table 32 represent the specific standards and performance measures that were applied in conducting these evaluations. The performance standards in Table 32 include the transit system performance measures which the Wisconsin Department of Transportation utilizes to assess the performance of Wisconsin transit systems, and which the State requires be included in multi-year service and performance goals for each such transit system. Such measures include operating ratio, or farebox recovery rate; operating expense per passenger; passengers per capita; passengers per revenue vehicle hour of service; operating expenses per revenue vehicle hour of service; and revenue vehicle hours of service per capita. The performance standards and evaluation findings of this study can, therefore, provide guidance to the County in establishing the required multi-year service and performance goals.

## **OVERRIDING CONSIDERATIONS**

The objectives, principles, and standards set forth in Table 32 were intended to be used to guide the evaluation of the performance of the existing transit system and the design and evaluation of alternative service improvements. In the application of the objectives, principles, and standards, several overriding considerations must be recognized.

First, it must be recognized that an overall evaluation of the existing public transit services and the alternative service plans must be made on the basis of cost and revenue. Such an analysis may show the attainment of one or more standards to be beyond the economic capability of the community and, therefore, the standards cannot be met practically and must be either modified or eliminated.

Second, it must be recognized that a transit system is unlikely to fully meet all the standards and that the extent to which each standard is met, exceeded, or violated must serve as the final measure of the ability of the system to achieve the objective that a given standard supports.

Third, it must be recognized that certain intangible factors, including the perceived value of the transit service to the County and its potential acceptance by the concerned elected officials, may influence the preparation and selection of a recommended plan. Inasmuch as transit service may be perceived as a valuable service, the County may decide to initiate or retain such services regardless of performance or cost. Only if a considerable degree of such acceptance exists will service recommendations be implemented and their anticipated benefits realized.

Table 32

**PUBLIC TRANSIT SERVICE OBJECTIVES, PRINCIPLES, STANDARDS, AND PERFORMANCE MEASURES FOR BUS SERVICE PROVIDED BY THE MILWAUKEE COUNTY TRANSIT SYSTEM**

Objective	Principle	Standards	Performance Measure												
<p>1. The public transit system should effectively serve the existing land use pattern and support the implementation of planned land uses, meeting the demand and need for transit services, and particularly the needs of the transit-dependent population</p>	<p>Public transit is an essential element of the transportation system, connecting major land use activities and providing the accessibility essential to the support of these activities. Transit services are most cost-efficient when serving areas that are fully developed to medium and high densities. Transit also provides an important means of access to jobs and services for all segments of the population, but particularly for persons who must depend on transit as their primary means of travel. Accessible mainline bus service can promote flexible and cost-effective transit service by reducing expenditures for paratransit services.</p>	<p><u>Service Design and Operating Standards</u></p>													
		<p>1. The public transit system should serve travel demand generated within contiguous areas of urban development in the urbanized area and should be designed to provide for a higher degree of accessibility to areas of high density (7.0-17.9 dwelling units per net residential acre), and medium density (2.2-6.9 dwelling units per net residential acre) urban development than to areas of low-density development or which should be protected from development</p>	<p>1. --</p>												
		<p>2. Public transit services should be designed and operated so as to permit the orderly and efficient expansion of service to developing areas</p>	<p>2. --</p>												
		<p>3. Public transit services should be provided that address the varied travel and mobility needs of the County population and offer access to the major activity centers in the urbanized area. The transit services provided should include:</p> <ul style="list-style-type: none"> <li>a. Rapid and express service designed to reduce travel times for the longest trips made between component parts of the transit service area and to connect areas of high and medium density urban development to the Milwaukee central business district and the largest major activity centers</li> <li>b. Local service designed to provide transit within and between residential areas, to link residential areas with nearby major activity centers, and to provide for transfer connections with rapid, express, and other local services</li> <li>c. Local shuttle services designed to connect with rapid, express, and local services serving major activity centers</li> <li>d. Paratransit service designed to meet the needs of people with disabilities who are unable to use accessible mainline bus service</li> </ul>	<p>3. --</p>												
		<p>4. The public transit system should serve and connect major activity centers in the urbanized area that currently generate, or have the potential to generate, significant ridership including:</p> <ul style="list-style-type: none"> <li>a. Housing facilities serving transit-dependent persons who are living independently including elderly persons, people with disabilities, and low-income individuals</li> <li>b. Principal hospitals and medical centers</li> <li>c. Major retail shopping malls</li> <li>d. Principal colleges and universities</li> <li>e. Major Federal, State, and local governmental offices and institutions</li> <li>f. Major employers with more than 500 employees at one site</li> <li>g. Major industrial and office parks</li> <li>h. Major passenger terminals for intercity bus, passenger rail, and airline carriers</li> <li>i. Major public and private recreational centers hosting high attendance events</li> </ul>	<p>4. --</p>												
		<p><u>Service Performance Standards</u></p>													
		<p>1. The population served should be maximized, particularly those who are transit-dependent. The population shall be considered as served when it resides within the following distances of transit service:</p>	<p>1. The number of people residing within appropriate walking or driving distance of a bus stop and the percent of the total population represented</p>												
		<p style="text-align: center;"><u>Maximum Distance from a Bus Stop</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Service Type</u></th> <th style="text-align: center;"><u>Walking</u></th> <th style="text-align: center;"><u>Driving</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td style="text-align: center;">1/2 Mile</td> <td style="text-align: center;">3 Miles</td> </tr> <tr> <td>Express</td> <td style="text-align: center;">1/2 Mile</td> <td style="text-align: center;">--</td> </tr> <tr> <td>Local</td> <td style="text-align: center;">1/4 Mile</td> <td style="text-align: center;">--</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Walking</u>	<u>Driving</u>	Rapid	1/2 Mile	3 Miles	Express	1/2 Mile	--	Local	1/4 Mile	--	
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<p>2. The major activity centers and jobs served should be maximized. Major activity centers and jobs shall be considered as served when located within the following distance of transit service:</p> <p style="text-align: center;">Maximum Walking</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Service Type</u></th> <th style="text-align: center;"><u>Distance from a Bus Stop</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td style="text-align: center;">1/2 Mile</td> </tr> <tr> <td>Express</td> <td style="text-align: center;">1/2 Mile</td> </tr> <tr> <td>Local</td> <td style="text-align: center;">1/4 Mile</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Distance from a Bus Stop</u>	Rapid	1/2 Mile	Express	1/2 Mile	Local	1/4 Mile	<p>2. The number of major activity centers and jobs located within appropriate walking distance of a bus stop and the percent of the total activity centers and jobs represented</p>						
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<p>3. The transit supportive land area served should be maximized. To be considered transit supportive, an area should have a density of at least 4 dwelling units per net residential acre, or at least 4 jobs per gross acre</p>	<p>3. The proportion of the transit supportive land area located within one-quarter mile of a local bus route</p>														



Table 32 (continued)

Objective	Principle	Standards	Performance Measure																										
1. (continued)	(continued)	<p>4. The public transit system should provide service within the urbanized area that maximizes the population that is:</p> <ul style="list-style-type: none"> <li>a. Within 45 minutes overall transit travel time of 40 percent of the jobs in the urbanized area</li> <li>b. Within 35 minutes overall transit travel time of a major shopping mall</li> <li>c. Within 40 minutes overall transit travel time of a major college or university</li> <li>d. Within 30 minutes overall transit travel time of a major hospital or medical center</li> <li>e. Within 40 minutes overall transit travel time of a major Federal, State, or local governmental office or public institutional center</li> <li>f. Within 60 minutes overall transit travel time of a major passenger terminal for an intercity bus, passenger rail, or airline carrier</li> <li>g. Within 60 minutes overall transit travel time of a major public or private recreational center hosting high attendance events</li> </ul>	4. The number of people residing within each of the prescribed travel times and the percent of the total population represented																										
2. The transit system should promote effective utilization of transit service and operate service that is reliable and provides for user convenience and comfort.	The benefits of a public transit system are, to a large extent, greatly related to the degree to which it is used as measured by transit ridership. Ridership is a function of the degree to which people have access to transit services which are reliable and provide for quick, convenient, and comfortable travel. Riders view transit services with these attributes as an effective and attractive alternative to the private automobile.	<p><u>Service Design and Operating Standards</u></p> <ol style="list-style-type: none"> <li>1. Public transit routes should have direct alignments with a limited number of turns, and should be arranged to minimize duplication of service and unnecessary transfers which would otherwise discourage transit use.</li> <li>2. Rapid and express transit routes should be extended as needed to perform a collection-distribution function at the ends of the route</li> <li>3. Public transit service that does not meet service performance standards may be warranted in special instances if it improves total system continuity and/or provides significant feeder service or transfer opportunities to other routes</li> <li>4. Bus stops should be clearly marked by easily recognized bus stop signs and located so as to minimize the walking distance to and from residential areas and major activity centers over an accessible path for all users including people with disabilities, and to facilitate connections with other transit services where appropriate. The suggested locations and spacing for stops are as follows: <table border="1" data-bbox="667 898 1247 1060"> <thead> <tr> <th><u>Service Type</u></th> <th><u>Stop Locations and Spacing</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>At terminal areas and one-mile or more on line-haul sections</td> </tr> <tr> <td>Express</td> <td>At terminal areas, intersecting transit routes, signalized intersections with arterial streets, and major activity centers</td> </tr> <tr> <td>Local</td> <td>600 to 1,200 feet (two to three blocks) apart</td> </tr> </tbody> </table> </li> </ol> <p>5. The public transit system should be designed and operated so as to achieve the following minimum overall travel speeds by area based on average weekday conditions:</p> <table border="1" data-bbox="667 1119 1247 1245"> <thead> <tr> <th rowspan="2"><u>Service Type</u></th> <th colspan="3"><u>Travel Speed (miles per hour)</u></th> </tr> <tr> <th><u>CBD</u></th> <th><u>Central City</u></th> <th><u>Outlying Areas</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>5-10</td> <td>15-30</td> <td>40-55</td> </tr> <tr> <td>Express</td> <td>5-10</td> <td>15-20</td> <td>25-35</td> </tr> <tr> <td>Local</td> <td>5-10</td> <td>12-15</td> <td>18-25</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Stop Locations and Spacing</u>	Rapid	At terminal areas and one-mile or more on line-haul sections	Express	At terminal areas, intersecting transit routes, signalized intersections with arterial streets, and major activity centers	Local	600 to 1,200 feet (two to three blocks) apart	<u>Service Type</u>	<u>Travel Speed (miles per hour)</u>			<u>CBD</u>	<u>Central City</u>	<u>Outlying Areas</u>	Rapid	5-10	15-30	40-55	Express	5-10	15-20	25-35	Local	5-10	12-15	18-25
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6. The hours of service operation for the public transit system should serve the demand generated by the land use activities served by, and the function of, each route. Service periods should also accommodate the travel needs of those who depend on the transit system as their primary travel mode. The transit system should, therefore, strive to operate routes with service hours as follows: <table border="1" data-bbox="667 1360 1247 1476"> <thead> <tr> <th rowspan="2"><u>Service Type</u></th> <th colspan="3"><u>Desirable Service Hours</u></th> </tr> <tr> <th><u>Weekdays</u></th> <th><u>Saturdays</u></th> <th><u>Sundays/Holidays</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>6:00 a.m.-10:00 p.m.</td> <td>6:00 a.m.-10:00 p.m.</td> <td>6:00 a.m.-10:00 p.m.</td> </tr> <tr> <td>Express</td> <td>5:00 a.m.-11:00 p.m.</td> <td>5:00 a.m.-11:00 p.m.</td> <td>5:00 a.m.-11:00 p.m.</td> </tr> <tr> <td>Local</td> <td>5:00 a.m. - 1:00 a.m.</td> <td>5:00 a.m. - 1:00 a.m.</td> <td>5:00 a.m. - 1:00 a.m.</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Desirable Service Hours</u>			<u>Weekdays</u>	<u>Saturdays</u>	<u>Sundays/Holidays</u>	Rapid	6:00 a.m.-10:00 p.m.	6:00 a.m.-10:00 p.m.	6:00 a.m.-10:00 p.m.	Express	5:00 a.m.-11:00 p.m.	5:00 a.m.-11:00 p.m.	5:00 a.m.-11:00 p.m.	Local	5:00 a.m. - 1:00 a.m.	5:00 a.m. - 1:00 a.m.	5:00 a.m. - 1:00 a.m.	7. The availability of weekend and holiday service enhances the attractiveness of weekday service and positively affects system ridership by providing that regular weekday riders need not seek alternative travel modes. Therefore, a reasonable level of service should also be maintained on weekends and holidays.									
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8. Operating headways for public transit fixed-route service should be capable of accommodating passenger demand at the recommended load standards, and should also provide for a convenient service so as to encourage transit use. The desirable headways presented below represent a frequency of transit service that would be desirable to provide a service of high quality and to promote transit ridership. Lower headways may be provided in the core service area <sup>9</sup> for the system and high density corridors of heavy travel demand, while only higher headways may be feasible in areas of low and medium density. <table border="1" data-bbox="667 1745 1247 1871"> <thead> <tr> <th rowspan="3"><u>Service Type</u></th> <th colspan="3"><u>Desirable Headway (minutes)</u></th> </tr> <tr> <th colspan="2"><u>Weekday</u></th> <th><u>Weekend</u></th> </tr> <tr> <th><u>Peak Period</u></th> <th><u>Off-Peak Period</u></th> <th><u>Periods/Holidays</u></th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>10</td> <td>20</td> <td>30</td> </tr> <tr> <td>Express</td> <td>10</td> <td>20</td> <td>30</td> </tr> <tr> <td>Local</td> <td>10</td> <td>20</td> <td>30</td> </tr> </tbody> </table>	<u>Service Type</u>	<u>Desirable Headway (minutes)</u>			<u>Weekday</u>		<u>Weekend</u>	<u>Peak Period</u>	<u>Off-Peak Period</u>	<u>Periods/Holidays</u>	Rapid	10	20	30	Express	10	20	30	Local	10	20	30	8.						
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Table 32 (continued)

Objective	Principle	Standards	Performance Measure																																																															
2. (continued)	(continued)	<p>8. (continued) Operating headways should not exceed the following maximum headways throughout the service area when service is offered: <u>Maximum Headway (minutes)</u></p> <table border="1" data-bbox="673 304 1031 430"> <thead> <tr> <th rowspan="2">Service Type</th> <th colspan="2">Weekday</th> <th>Weekend</th> </tr> <tr> <th>Peak</th> <th>Off-Peak</th> <th>Periods/ Holidays</th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>30</td> <td>60</td> <td>60</td> </tr> <tr> <td>Express</td> <td>30</td> <td>60</td> <td>60</td> </tr> <tr> <td>Local</td> <td>30</td> <td>60</td> <td>60</td> </tr> </tbody> </table> <p>9. All transit vehicles should be equipped with padded seats, heating/air conditioning units, and wheelchair lifts/ramps that are in good working condition. Window treatments should maintain outward visibility for passengers. Vehicle interiors and exteriors should be cleaned and inspected daily with needed equipment repairs made on a timely basis</p> <p>10. Consideration should be given to rehabilitating or replacing each public transit vehicle at the end of its normal service life, which shall be defined as follows:</p> <table border="1" data-bbox="673 598 1120 724"> <thead> <tr> <th rowspan="2">Vehicle Type</th> <th rowspan="2">Length (feet)</th> <th colspan="2">Normal Service Life</th> </tr> <tr> <th>Years</th> <th>Mileage</th> </tr> </thead> <tbody> <tr> <td>Heavy-duty bus</td> <td>35 or more</td> <td>12</td> <td>500,000</td> </tr> <tr> <td>Heavy-duty bus</td> <td>25-30</td> <td>10</td> <td>350,000</td> </tr> <tr> <td>Medium-duty bus</td> <td>25-30</td> <td>7</td> <td>200,000</td> </tr> <tr> <td>Light-duty bus</td> <td>25-30</td> <td>5</td> <td>150,000</td> </tr> </tbody> </table> <p>11. Consideration should be given to providing passenger shelters of an attractive design at all bus stops where warranted by existing conditions including: boarding passenger counts, passenger waiting time, bus stop situation, exposure to weather conditions, and the facility or land use being served.<sup>b</sup> Access to shelters for people with disabilities should be maintained.</p> <p>12. Park-ride facilities should be provided at appropriate stops on rapid and express services to serve transit users from medium and low density residential areas. Sufficient off-street automobile parking should be provided at park-ride facilities to accommodate the total parking demand generated by transit users and carpoolers</p> <p>13. Provisions for transporting bicycles on transit vehicles should be considered</p> <p><u>Service Performance Standards</u></p> <p>1. Ridership on the transit system and the overall effectiveness of the services provided should be maximized.</p> <p>2. Ridership and service levels on each transit route should be monitored and service levels adjusted to be appropriate for demand levels unless special circumstances warrant otherwise.<sup>c</sup></p> <p>3. The minimum service effectiveness levels to warrant continued service operation shall be as specified below, unless special circumstances warrant otherwise<sup>c</sup>:</p> <table border="1" data-bbox="673 1365 1136 1470"> <thead> <tr> <th>Service Period</th> <th>Total Boarding Passengers Per Revenue Vehicle Hour</th> </tr> </thead> <tbody> <tr> <td>Weekdays</td> <td>22<sup>e</sup></td> </tr> <tr> <td>Saturdays</td> <td>15<sup>e</sup></td> </tr> <tr> <td>Sundays/Holidays</td> <td>10<sup>e</sup></td> </tr> </tbody> </table> <p>4. The average maximum load factor, measured as the ratio of passengers to bus seats at that point on a route where passenger loads are highest, should not exceed the following during any one-hour period:</p> <table border="1" data-bbox="673 1522 1153 1627"> <thead> <tr> <th rowspan="2">Service Type</th> <th colspan="2">Average Maximum Load Factor</th> </tr> <tr> <th>Peak Periods</th> <th>All Other Times</th> </tr> </thead> <tbody> <tr> <td>Rapid</td> <td>1.00</td> <td>1.00</td> </tr> <tr> <td>Express</td> <td>1.33</td> <td>1.00</td> </tr> <tr> <td>Local</td> <td>1.33</td> <td>1.00</td> </tr> </tbody> </table> <p>5. The transit system should be designed and operated to maximize schedule adherence and be "on-time" at least 90 percent of the time. On-time is defined as schedule adherence within the ranges of one minute early and three minutes late.</p> <p>6. Travel for public transit passengers should be reasonable in comparison to travel by private automobile for trips made between component parts of the service area. Transit travel distances and times should not be more than 1.5 times longer than with the automobile travel for comparable trips</p>	Service Type	Weekday		Weekend	Peak	Off-Peak	Periods/ Holidays	Rapid	30	60	60	Express	30	60	60	Local	30	60	60	Vehicle Type	Length (feet)	Normal Service Life		Years	Mileage	Heavy-duty bus	35 or more	12	500,000	Heavy-duty bus	25-30	10	350,000	Medium-duty bus	25-30	7	200,000	Light-duty bus	25-30	5	150,000	Service Period	Total Boarding Passengers Per Revenue Vehicle Hour	Weekdays	22 <sup>e</sup>	Saturdays	15 <sup>e</sup>	Sundays/Holidays	10 <sup>e</sup>	Service Type	Average Maximum Load Factor		Peak Periods	All Other Times	Rapid	1.00	1.00	Express	1.33	1.00	Local	1.33	1.00	<p>9. --</p> <p>10. --</p> <p>11. --</p> <p>12. --</p> <p>13. --</p> <p>1a. Total passengers 1b. Total passengers per capita 1c. Revenue vehicle hours per capita 1d. Total passengers per revenue vehicle hour 1e. Total passengers per revenue vehicle mile</p> <p>2a. Total boarding passengers per revenue vehicle mile 2b. Total boarding passengers per revenue vehicle hour 2c. Productivity frequency index<sup>d</sup></p> <p>3. Total boarding passengers per revenue vehicle hour</p> <p>4. Average maximum load factor by route for the weekday peak hour of service</p> <p>5. Percent of scheduled bus trips on time</p> <p>6a. Ratio of transit to highway distance 6b. Ratio of transit to highway travel time</p>
Service Type	Weekday			Weekend																																																														
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Table 32 (continued)

Objective	Principle	Standards	Performance Measure
2. (continued)	(continued)	7. Preventative maintenance policies and practices should be established to maximize the reliability of revenue vehicles so that: a. All of the vehicles required to operate peak service are available daily b. The number of breakdowns requiring a maintenance road call do not exceed one per 6,000 vehicle miles of service	7a. Number of buses available for weekday peak service versus peak bus requirement 7b. Percent of buses that miss scheduled pull-outs 7b. Vehicle miles between road calls
3. The transit system should promote the safety and security of its passengers, operating equipment and facilities, and personnel and project a positive image to the general public.	Accidents take a heavy toll in property damage and human suffering, and can contribute substantially to the overall costs of operation for the public transit system and, in particular, the public funds required. Incidences that jeopardize the security of passengers or transit system property may promote the perception that transit travel is not safe, thereby hampering the mobility of persons who must travel within areas the public deems unsafe. Therefore, every attempt should be made in the operation of the transit system to reduce the incidence and severity of accidents and to increase security for transit passengers, equipment and facilities, and personnel	<p><u>Service Design and Operating Standards</u></p> <p>1. Public transit service should not be operated over streets that exhibit conditions that may be hazardous for transit operations including steep grades, narrow traffic lanes, uncontrolled intersections, poor pavement conditions, or habitual problems with illegal parking</p> <p>2. Nearside bus stops facilitate passenger use of crosswalks and convenience in transferring between routes, provide for adequate sight considerations for vehicle operators, and allow transit vehicles to utilize the intersection to merge into traffic. The use of nearside locations for bus stops on a consistent basis is also favored by people with disabilities. Therefore, bus stops should generally be located at the nearside of intersections to promote passenger safety and the safe operation of transit vehicles. Stops may be located elsewhere if warranted by special circumstances</p> <p>3. Bus stops should not be located in areas without adequate pedestrian facilities such as sidewalks or adequately maintained roadway shoulders that provide for a safe and accessible travel path for all users including people with disabilities.</p> <p>4. The public transit system should promote the use of appropriate security equipment and practices--such as mobile radios, automatic vehicle location (AVL) hardware, cameras, passenger information kiosks with security call boxes, and security personnel--to enhance the security of passengers and transit system equipment, facilities, and personnel</p> <p><u>Service Performance Standards</u></p> <p>1. The number of accidents on the public transit system should be minimized</p> <p>2. The number of security incidences on transit property should be minimized</p>	<p>1. --</p> <p>2. --</p> <p>3. --</p> <p>4. --</p> <p>1. The number of accidents on the transit system per 100,000 vehicle miles of service</p> <p>2. The number of security incidences on the transit system per 100,000 vehicle miles of service</p>
4. The public transit system should promote efficiency in the total transportation system	Public transit facilities and services can promote economy and efficiency in the total transportation system. The transit system has the potential to supply additional passenger transportation capacity, which can alleviate peak loadings on arterial street facilities and assist in reducing the demand for land necessary for parking facilities at major activity centers. Efficient transit service also has the potential to reduce energy consumption and air pollutant emissions	<p><u>Service Performance Standards</u></p> <p>1. The total amount of energy and the total amount of energy per passenger mile consumed in operating the total transportation system of which the public transit system is an integral part, particularly petroleum-based fuels, should be minimized</p> <p>2. The amount of highway system capacity which must be provided to serve travel demand should be minimized</p>	<p>1. Passenger miles per gallon of motor fuel</p> <p>2. Potential increase in vehicle traffic on surface streets if transit trips use automobile</p>
5. The public transit system should be economical and efficient, meeting all other objectives at the lowest possible cost	The total financial resources of the County are limited and any investment of funds in public transit facilities and services must be weighed against other public investments. Therefore, total transit system costs should be minimized for the desired level of transit service and transit revenues should be maximized to maintain the financial stability of the services. The attainment of this objective may at times conflict with, and require the modification or elimination of, other standards	<p><u>Service Design and Operating Standards</u></p> <p>1. The total operating and capital investment for the public transit system should be minimized and reflect efficient utilization of resources</p> <p>2. The fare policy for the public transit system should provide for premium fares for premium transit services, as well as special or discounted fares for priority population groups and frequent transit riders</p> <p>3. Periodic increases in passenger fares should be considered to maintain the financial stability of the public transit system when: a. The farebox recovery rate for the transit system goes below levels determined to be acceptable by local officials b. Operating expenses for the transit system have increased by 10 to 15 percent since fares were last raised c. Projected levels of Federal and State operating assistance funds would require an increase in projected local operating assistance levels above that determined to be acceptable by local officials</p> <p>4. Public transit service should not be extended to communities or major activity centers located outside the County at the direct expense of County taxpayers. The net local costs—total costs minus passenger revenues and Federal and/or state assistance funds—of such transit service shall be provided through sources other than County tax dollars unless special circumstances warrant otherwise</p>	<p>1. --</p> <p>2. --</p> <p>3. --</p> <p>4. --</p>

Table 32 (continued)

Objective	Principle	Standards	Performance Measure
5. (continued)	(continued)	<p><u>Service Performance Standards</u></p> <p>1. The operating expense per unit of transit service, the operating expense per passenger, and the total operating assistance per passenger should be minimized for the public transit system as a whole. Annual increases in such costs should not exceed the average percentage increase experienced by comparable transit systems</p> <hr/> <p>2. Public transit system operating revenues generated from passenger fares and private sources should be maximized.</p> <hr/> <p>3. The total operating expense per passenger and total operating assistance per passenger should be minimized for the public transit system as a whole. Annual increases in such costs should not exceed the average percentage increase experienced by comparable transit systems</p> <hr/> <p>4. Cost effectiveness levels on each transit route should be monitored and service levels adjusted to be appropriate for demand levels or the route eliminated unless special circumstances warrant otherwise<sup>c</sup>. Cost effectiveness levels shall be measured using the total boarding passengers per revenue vehicle hour for each route.</p>	<p>1a. Operating expense per revenue and total vehicle mile</p> <p>1b. Operating expense per revenue and total vehicle hour</p> <p>1c. Operating expense per boarding passenger</p> <p>1d. Total operating assistance per boarding passenger</p> <hr/> <p>2. Percent of operating expenses recovered through passenger and other operating revenues, excluding public operating assistance</p> <hr/> <p>3a. Total operating expense per boarding passenger</p> <p>3b. Total operating assistance per boarding passenger</p> <hr/> <p>4a. Total boarding passengers per revenue vehicle hour</p>

<sup>a</sup>The "core service area" for the transit system is the area bounded by Capitol Drive on the north, Oklahoma Avenue on the south, 76<sup>th</sup> Street on the west, and Lake Michigan on the east.

<sup>b</sup>Potential bus shelter locations shall be reviewed and scored against criteria which are deemed to warrant the construction of a shelter, with a range of point values assigned to conditions for the criteria that rate the relative need for a shelter. The total point value for each location shall determine its rank in a prioritized listing of potential sites with a maximum possible total score of 100 points for each location. The criteria and conditions used to rank bus shelter locations are as follows:

Conditions Warranting Bus Shelter	Point Value	Conditions Warranting Bus Shelter	Point Value
<u>Boarding Passenger Counts</u>		<u>Facility or Land Use Being Served</u>	
Less than 25 passengers.....	0	(values are additive up to a maximum of 10 points)	
25-74 passengers.....	10	Not a transit trip generator.....	0
75-149 passengers.....	20	Commercial or shopping center.....	5
150-299 passengers.....	30	Industrial plant or office building.....	5
300 or more passengers.....	40	Park or recreation center.....	5
<u>Passenger Waiting Time</u>		Other significant transit trip generator.....	5
(one-half of the midday headway)		High density residential area.....	10
Less than 3.0 minutes.....	0	Facility or activity for elderly individuals.....	10
3.1-6.0 minutes.....	4	Facility or activity for people with disabilities.....	10
6.1-9.0 minutes.....	8	Hospital, medical center, or clinic.....	10
9.1-12.0 minutes.....	12	University, college, or public secondary school.....	10
12.1-15.0 minutes.....	16		
More than 15.0 minutes.....	20		
<u>Bus Stop Situation</u>			
Not a transfer point.....	0		
Transfer point.....	10		
<u>Exposure to Weather Conditions</u>			
None.....	0		
Minimum.....	5		
Average.....	10		
Full.....	20		

<sup>c</sup>A reasonable period of time should be allowed for ridership to develop and stabilize before evaluating the performance of new transit services to determine if the service should be continued, modified, or eliminated. Generally, new transit services should achieve 40 percent of average performance levels for existing routes after six months of operation; 60 percent of average performance levels for existing routes after nine months of operation; and 80 percent of average performance levels for existing routes after one year of operation. The period for services that are funded through Federal or state transit demonstration grants may be extended to coincide with the period for the demonstration grant.

<sup>d</sup>The productivity frequency index (PFI) is an analytical tool developed by the Milwaukee County Transit System which measures the relationship between passengers per revenue vehicle hour of service and the service frequency, or headway on each bus route. The index is calculated for each route in the transit system by service period as follows:

$$PFI = \text{Boarding Passengers per Revenue Vehicle Hour} \times \frac{\text{Average Headway on Route}}{60 \text{ Minutes}}$$

The PFI values calculated for each route are compared against target values for the transit system to assist in determining if changes in the headways on the route should be considered.

<sup>e</sup>During 2004, the transit system carried about 41 total passengers per revenue vehicle hour systemwide on all services and the regular routes operated on an average weekday carried about 35 total passengers per revenue vehicle hour.

Source: SEWRPC.



**Milwaukee County Transit System  
Interoffice Memorandum**

**TO:** File

**FROM:** Emmanuel Okoro – Transit Planner

**SUBJECT:** 2020 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

**DATE:** January 11th, 2020

Planning staff have annually compared the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the “Level of Service Methodology” section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2020 schedule period.

For the purposes of assessing compliance with Title VI, a census tract was identified as minority if the concentration of minority residents in that tract exceeded the countywide average for minority residents. According to U.S. Census statistics from 2010, 45.7% of the population of Milwaukee County is made up of ethnic minorities who are not white and not Hispanic. Similarly, census tracts with a percentage of minority residents less than the countywide average were identified as a non-minority tract. Given these definitions, each MCTS bus route was identified as primarily serving:

- Minority areas
  - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
  - If < 33.3% of the route mileage operated within minority tracts

**Service Standards**

**Vehicle Load** - Average maximum loads were calculated during the a.m. and p.m. peak periods for each regular route (see table – 2020 Weekday Average Maximum Load on page 4). All regular routes are well below the 1.3 standard. The highest maximum loads were on routes that traveled through areas that served minority populations, however these load factors were still well below the standard.

**Vehicle Headways** – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (see table – 2020 Average headways for Regular Routes on pages 5-7).



**On Time Performance** - All operators are required to meet an on-time performance standard of being between two minutes early and five minutes late at a time point. MCTS regularly monitors on-time performance throughout the system. MCTS has set a system wide on-time standard of 90%. Data from 2020 shows that averaged 86.3% over the year (see table – 2020 MCTS System On-Time Performance on page 8).

**Distribution of Transit Amenities** – The supply and demand for transit service is measured according to the number of passengers per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see table – 2020 Weekday Bus Hours and PBH on page 10). While the passengers per bus hour is higher on routes that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

The distribution of bus shelters is based on a scoring system that rates several factors, e.g., daily ridership at the bus stop, if the stop is at a transfer corner, and the level of exposure to the weather at the stop. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2020, roughly 57% of MCTS shelters were located in census tracts identified as predominantly minority.

Route guides and timetables are extensively distributed throughout the community. An entire set of all route guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on-board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them and may also access schedule information via a mobile phone or the internet. Passengers can purchase M-Cards and weekly or monthly passes at several grocery stores, gas stations, and banks/credit unions as well as on the new RideMCTS app.

**Service Availability** – The span of service, e.g., from 5:00 a.m. until 1:00 a.m., is equitably distributed among both minority and non-minority areas (2020 – Average Hours of the Day Served on Weekdays on page 10). No corridors identified as minority receives less than a 19-hour span of service on Weekdays. The average hours of the day served on routes identifies as minority is 21 hours, while non-minority was 20 hours.

## Service Policies

**Vehicle Assignment** – MCTS’s fleet is fairly standardized with regard to amenities. Most of the fleet are 40-foot standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count on page 11). Since 2019, 52 Gillig coaches were added to the fleet with similar amenities as the New Flyer buses. All vehicles are available for use on any route and are assigned in no particular order.

**Transit Security** – The Director of Safety, Security and Training and Coordinator of Safety and Security work in collaboration to coordinate all security and emergency related functions for MCTS and ensures its compliance with all local, state, and federal security guidelines. Meetings are held regularly with local law enforcement and emergency management leaders to foster strong communication and collaborative relationships.

Response to incidents and patrolling of MCTS property and bus routes is provided by Allied Universal Security Services, a private security firm contracted by MTS. Allied Universal employs over 35 full and part-time transit security officers and provides on-site management of more than 1,864 hours of weekly service. Transit Security officers are available to respond to transit incidents 24/7/365. With direction from the Safety and Security



Coordinator, Transit Security managers assign priority for bus riding to the routes and times of day where MCTS and local crime data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are analyzed monthly to aid the security team in the development of sound security deployment strategies.

The Safety, Security and Training Department along with representatives from the Transportation Department leadership meet monthly with representatives from the operator's union, station management and transit security to address and discuss security issues. The Transportation Security Committee meetings have been an extremely effective mechanism to ensure quality communication between bus operators and the security team.

To deter and detect criminal activity MCTS uses a 10-camera system with a 4-terabyte hard drive that will store weeks of video on board the bus. This system, provided by Apollo Video Systems, has 4 cameras that view the exterior of the bus on all sides and 6 high-definition, infrared cameras on the interior of the bus that record audio and video whenever the bus is in service. MCTS staff can request video from any bus in the fleet through a software interface and the video automatically downloads to a central server once the bus pulls into the station. This system has been an excellent addition to the transit security, customer service and risk management programs.

In 2008, MCTS partnered with the Milwaukee Police Department to secure a Transit Security Grant to install over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but MCTS can request video from these cameras at any time.

The Safety, Security and Training Department trains all new operators in safe passenger interaction techniques, conflict communication skills and emergency response to an active shooter. During this 4-hour class, the TSA also presents to operators their First Observer Plus program on suspicious activity recognition and reporting. MCTS is currently seeking a Transit Security Grant to secure funding for refresher training for all employees for awareness of suspicious persons, activity, and potential threats to our transportation infrastructure.



**2020 Title VI Route Evaluation**  
**Weekday Average Maximum Load Factors**  
**For Regular Routes During AM and PM Peak Periods**

<u>Route</u>	<u>Name</u>	<u>AM Load</u>	<u>PM Load</u>
<b>Minority</b>			
RED	Capitol Drive	11	15
BLU	Fond du Lac - National	13	16
PUR	27th Street	16	19
12D	Teutonia - Hampton	12	12
14	Forest Home/Humboldt	10	14
19	M.L.K - S. 13th/S. 20th	9	13
21	North Avenue	7	15
22	Center Street - N. 92nd	7	11
30	Sherman - Wisconsin	13	15
31	State - Highland	6	8
33	Vliet - Juneau	5	5
35	35th Street	10	14
54	Mitchell - Burnham	12	16
57	Walnut - Appleton	7	9
60	Burleigh Street	13	13
63	Silver Spring-Pt. Washington	8	11
67	N. 76th - S. 84th	10	15
76	N. 60th - S. 70th	12	16
80	6th Street	15	13
<b>Group Average</b>		<b>10</b>	<b>13</b>
<b>Non-Minority</b>			
GRE	Oakland-Howell	13	13
GOL	Wisconsin	10	17
15	Holton - Kinnickinnic	12	17
28	108th Street	8	9
51	Oklahoma Avenue	9	11
52	Clement-15th Ave.	5	7
53	Lincoln Avenue	12	10
55	Layton Avenue	9	8
56	Greenfield Avenue	9	5
64	S. 60th Street	4	5
<b>Group Average</b>		<b>9</b>	<b>10</b>

Data is for Fall of 2020 service from 2020 HASTUS Multiple Vehicle Schedule. Maximum loads are based on the average of maximum number of people aboard each trip from 6am-9am or 3pm-6pm in the peak direction from APC route trip list report data for Fall of 2020. Load Factor is calculated by taking the average of the peak period, peak direction maximum trip loads divided by the number of seats on a standard 40-foot bus (35 seats). Reference from Ridecheck ridership report by "Statistics by Route and Time Period".





## 2020 Title VI Route Evaluation

### Weekday Average Headways for Regular Routes

<u>Route</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
<b>Minority</b>						
RED	Capitol Drive	13	14	13	16	19
BLU	Fond du Lac - National	13	12	12	16	24
PUR	27th Street	12	14	13	21	22
12	Teutonia - Hampton	12	13	13	20	19
14	Forest Home/Humboldt	18	21	21	16	25
19	M.L.K - S. 13th/S. 20th	14	16	16	20	25
21	North Avenue	15	15	15	19	27
22	Center Street - N. 92nd	22	20	22	26	30
30	Sherman - Wisconsin	11	10	10	17	21
31	State - Highland	20	26	25	28	30
33	Vliet - Juneau	28	29	30	25	47
35	35th Street	18	24	22	26	29
54	Mitchell - Burnham	32	32	33	33	36
57	Walnut - Appleton	27	28	26	39	34
60	Burleigh Street	22	24	20	30	28
63	Silver Spring-Pt. Washington	22	20	21	30	36
67	N. 76th - S. 84th	17	24	18	26	32
76	N. 60th - S. 70th	17	22	18	28	37
80	6th Street	14	17	15	19	26
<b>Group Average</b>		<b>18</b>	<b>20</b>	<b>19</b>	<b>24</b>	<b>29</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	13	14	14	19	24
GOL	Wisconsin	16	14	15	20	28
15	Holton - Kinnickinnic	22	22	22	23	31
28	108th Street	29	29	31	35	34
51	Oklahoma Avenue	23	21	20	27	31
52	Clement-15th Ave.	42	41	45	56	61
53	Lincoln Avenue	21	28	22	26	31
55	Layton Avenue	37	39	41	39	43
56	Greenfield Avenue	25	27	29	29	31
64	S. 60th Street	40	39	39	37	37
<b>Group Average</b>		<b>27</b>	<b>27</b>	<b>28</b>	<b>31</b>	<b>35</b>

Data is for Fall of 2020 service from 2020 HASTUS Multiple Vehicle Schedule



## 2020 Title VI Route Evaluation

### Saturday Average Headways for Regular Routes

<u>Route</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
<b>Minority</b>						
RED	Capitol Drive	17	16	17	21	30
BLU	Fond du Lac - National	17	17	16	23	30
PUR	27th Street	17	16	16	21	29
12	Teutonia - Hampton	20	21	22	29	27
14	Forest Home/Humboldt	26	22	24	30	37
19	M.L.K - S. 13th/S. 20th	23	20	21	29	29
21	North Avenue	26	18	19	24	32
22	Center Street - N. 92nd	24	26	26	25	27
30	Sherman - Wisconsin	13	13	13	17	23
31	State - Highland	28	22	22	38	44
33	Vliet - Juneau	23	25	26	23	38
35	35th Street	20	22	22	33	36
54	Mitchell - Burnham	34	32	31	45	40
57	Walnut - Appleton	31	33	34	39	41
60	Burleigh Street	27	22	23	24	42
63	Silver Spring-Pt. Washington	32	26	26	24	31
67	N. 76th - S. 84th	27	29	29	28	35
76	N. 60th - S. 70th	20	20	20	30	30
80	6th Street	23	23	23	23	21
<b>Group Average</b>		<b>24</b>	<b>22</b>	<b>23</b>	<b>28</b>	<b>33</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	21	17	18	21	29
GOL	Wisconsin	21	19	19	21	30
15	Holton - Kinnickinnic	24	22	22	33	36
28	108th Street	35	36	36	35	35
51	Oklahoma Avenue	26	27	28	27	24
52	Clement-15th Ave.	39	40	41	61	65
53	Lincoln Avenue	33	28	33	41	38
55	Layton Avenue	42	37	37	38	48
56	Greenfield Avenue	30	34	34	43	39
64	S. 60th Street	37	37	37	37	37
<b>Group Average</b>		<b>31</b>	<b>30</b>	<b>31</b>	<b>36</b>	<b>38</b>

Data is for Fall of 2020 service from 2020 HASTUS Multiple Vehicle Schedule



## 2020 Title VI Route Evaluation Sunday Average Headways for Regular Routes

<u>Route</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
<b>Minority</b>						
RED	Capitol Drive	24	16	21	21	23
BLU	Fond du Lac - National	27	20	20	20	37
PUR	27th Street	24	16	16	28	26
12	Teutonia - Hampton	27	22	22	31	28
14	Forest Home/Humboldt	29	28	29	32	31
19	M.L.K - S. 13th/S. 20th	28	20	22	25	34
21	North Avenue	33	22	20	28	32
22	Center Street - N. 92nd	28	24	25	24	26
30	Sherman - Wisconsin	23	13	13	17	26
31	State - Highland	32	30	30	30	38
33	Vliet - Juneau	22	24	25	28	44
35	35th Street	26	24	24	33	37
54	Mitchell - Burnham	39	32	34	45	38
57	Walnut - Appleton	33	27	27	30	34
60	Burleigh Street	29	22	22	30	44
63	Silver Spring-Pt. Washington	26	25	33	33	32
67	N. 76th - S. 84th	32	31	29	35	35
76	N. 60th - S. 70th	35	26	25	32	30
80	6th Street	22	23	23	22	21
<b>Group Average</b>		<b>28</b>	<b>23</b>	<b>24</b>	<b>29</b>	<b>32</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	27	25	26	27	34
GOL	Wisconsin	26	24	24	28	37
15	Holton - Kinnickinnic	27	26	25	34	39
28	108th Street	34	36	35	42	N/A
51	Oklahoma Avenue	25	27	27	27	30
52	Clement-15th Ave.	39	40	41	61	67
53	Lincoln Avenue	36	39	40	39	36
55	Layton Avenue	55	39	48	53	55
56	Greenfield Avenue	40	33	36	43	40
64	S. 60th Street	36	36	36	36	35
<b>Group Average</b>		<b>35</b>	<b>33</b>	<b>34</b>	<b>39</b>	<b>41</b>

Data is for Fall of 2020 service from 2020 HASTUS Multiple Vehicle Schedule



## 2020 MCTS System Monthly On-Time Performance Averaged by Day and Time

<b>Fixed Route</b>	<u>Jan</u>
<b>On-Time Performance</b>	89.1%
<b>(2020)</b>	
	<u>Feb</u>
	89.2%
	<u>Mar</u>
	88.7%
	<u>Apr</u>
	87.7%
	<u>May</u>
	85.8%
	<u>Jun</u>
	83.4%
	<u>Jul</u>
	83.7%
	<u>Aug</u>
	83.1%
	<u>Sep</u>
	85.6%
	<u>Oct</u>
	86.2%
	<u>Nov</u>
	86.7%
	<u>Dec</u>
	86.6%
<b>Average</b>	<b><u>86.3%</u></b>



### 2020 Title VI Route Evaluation Weekday Bus Hours and PBH

<u>Route</u>	<u>Name</u>	<u>Type of Route</u>	<u>Avg. Ridership</u>	<u>Bus Hours</u>	<u>PBH</u>
<b>Minority</b>					
RED	Capitol Drive	Regular	2745	170	16
BLU	Fond du Lac - National	Regular	3776	296	13
PUR	27th Street	Regular	4195	253	17
12	Teutonia - Hampton	Regular	1774	164	11
14	Forest Home/Humboldt	Regular	1823	165	11
19	M.L.K - S. 13th/S. 20th	Regular	2057	198	10
21	North Avenue	Regular	1726	140	12
22	Center Street - N. 92nd	Regular	1070	89	12
30X	Sherman - Wisconsin	Regular	3794	101	38
31	State - Highland	Regular	461	69	7
33	Vliet - Juneau	Regular	286	36	8
35	35th Street	Regular	1600	115	14
54	Mitchell - Burnham	Regular	842	72	12
57	Walnut - Appleton	Regular	798	82	10
60	Burleigh Street	Regular	1329	105	13
63	Silver Spring-Pt. Washington	Regular	937	83	11
67	N. 76th - S. 84th	Regular	1468	137	11
76	N. 60th - S. 70th	Regular	1836	167	11
80	6th Street	Regular	2069	202	10
<b>Group Average</b>				<b>139</b>	<b>13</b>
<b>Non-Minority</b>					
GRE	Oakland-Howell	Regular	2284	206	11
GOL	Wisconsin	Regular	2007	183	11
15	Holton - Kinnickinnic	Regular	2332	163	14
28	108th Street	Regular	565	63	9
51	Oklahoma Avenue	Regular	1010	73	14
52	Clement-15th Ave.	Regular	221	34	7
53	Lincoln Avenue	Regular	849	65	13
55	Layton Avenue	Regular	551	51	11
56	Greenfield Avenue	Regular	1127	75	15
64	S. 60th Street	Regular	264	36	7
<b>Group Average</b>				<b>95</b>	<b>11</b>

Data is for Fall of 2020 service from 2020 MCTS Quarterly Route Evaluation Summary



**2020 Title VI Route Evaluation  
Average Hours of the Day Served on Weekdays**

<u>Route</u>	<u>Name</u>	<u>Type of Route</u>	<u>Hours of Day</u>
<b>Minority</b>			
RED	Capitol Drive	Regular	21
BLU	Fond du Lac - National	Regular	23
PUR	27th Street	Regular	22
12	Teutonia - Hampton	Regular	21
14	Forest Home/Humboldt	Regular	21
19	M.L.K - S. 13th/S. 20th	Regular	22
21	North Avenue	Regular	21
22	Center Street - N. 92nd	Regular	21
30	Sherman - Wisconsin	Regular	22
31	State - Highland	Regular	19
33	Vliet - Juneau	Regular	20
35	35th Street	Regular	22
54	Mitchell - Burnham	Regular	21
57	Walnut - Appleton	Regular	21
60	Burleigh Street	Regular	21
63	Silver Spring-Pt. Washington	Regular	20
67	N. 76th - S. 84th	Regular	21
76	N. 60th - S. 70th	Regular	21
80	6th Street	Regular	22
<b>Group Average</b>			<b>21</b>
<b>Non-Minority</b>			
GRE	Oakland-Howell	Regular	23
GOL	Wisconsin	Regular	21
15	Holton - Kinnickinnic	Regular	22
28	108th Street	Regular	18
51	Oklahoma Avenue	Regular	20
52	Clement-15th Ave.	Regular	19
53	Lincoln Avenue	Regular	20
55	Layton Avenue	Regular	19
56	Greenfield Avenue	Regular	21
64	S. 60th Street	Regular	18
<b>Group Average</b>			<b>20</b>

Data is for Fall of 2020 service from 2020 MCTS Quarterly Route Evaluation Summary



# Milwaukee County Transit System

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## BUS COUNT EFFECTIVE AS OF 12/7/2020

12/7/2020

	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer	2014 New Flyer	2015 New Flyer	2016 New Flyer	2017 New Flyer	2019 Gillig	2020 Gillig
Fond du Lac	5100-5101 5103-5114	5200-5218 5220-5234	5300-5333 5335-5354	5448-5454	5500-5534	5615 5618-5627	5700-5719		5900-5927	
Garage										
196	11	30	54	7	35	11	20		28	
Kinnickinnic	5116-5124 5126 51143-5152 5154-5155 5158-5189			5400-5447		5600-5614 5616-5617	5720-5729	5800-5814		6000-6022
Garage										
171	58	0		48	0	17	10	15	0	23
Active Buses	69	30	54	55	35	28	30	15	28	23
MCTS Buses	367									

5100-5189	2010	69	40' / 39
5200-5234	2011	30	40' / 39
5300-5354	2012	54	40' / 39
5400-5454	2013	55	40' / 39
5500-5534	2014	35	40' / 39
5600-5627	2015	28	40' / 35
5700-5729	2016	30	40' / 36
5800-5814	2017	15	40' / 36
5900-5927	2019	28	40' / 36
6000-6022	2020	23	40' / 36
		367	

Group 30- 5104, 5108,5115, 5118,5120, 5144, 5145, 5147, 5182,5202, 5205

**STORED AT FZ**

5101, 5102, 5516, 5125, 5126, 5146, 5153, 5156, 5157, 5165, 5174, 5187, 5203, 5220.

**Out of Service Buses: 25**

Total Active Buses: 367  
 Out of Service Buses: 25  
**Grand Total: 392**

Aver. Fleet Age As of  
 Average Age: 6.32

2020



**Milwaukee County Transit System  
Interoffice Memorandum**

**TO:** File

**FROM:** Emmanuel Okoro – Transit Planner

**SUBJECT:** 2021 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

**DATE:** December 13th, 2021

Planning staff have annually compared the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the “Level of Service Methodology” section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2021 schedule period.

For the purposes of assessing compliance with Title VI, a census tract was identified as minority if the concentration of minority residents in that tract exceeded the countywide average for minority residents. According to U.S. Census statistics from 2010, 45.7% of the population of Milwaukee County is made up of ethnic minorities who are not white and not Hispanic. Similarly, census tracts with a percentage of minority residents less than the countywide average were identified as a non-minority tract. Given these definitions, each MCTS bus route was identified as primarily serving:

- Minority areas
  - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
  - If < 33.3% of the route mileage operated within minority tracts

**Service Standards**

**Vehicle Load** - Average maximum loads were calculated during the a.m. and p.m. peak periods for each regular route (see table – 2021 Weekday Average Maximum Load on page 4). All regular routes are well below the 1.3 standard. The highest maximum loads were on routes that traveled through areas that served minority populations, however these load factors were still well below the standard.

**Vehicle Headways** – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (see table – 2021 Average headways for Regular Routes on pages 5-8).





**On Time Performance** - All operators are required to meet an on-time performance standard of being between two minutes early and five minutes late at a time point. MCTS regularly monitors on-time performance throughout the system. MCTS has set a system wide on-time standard of 90%. Data from 2021 shows that averaged 84.4% over the year (see table – 2021 MCTS System On-Time Performance on page 9).

**Distribution of Transit Amenities** – The supply and demand for transit service is measured according to the number of passengers per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see table – 2021 Weekday Bus Hours and PBH on page 10). While the passengers per bus hour is higher on routes that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

The distribution of bus shelters is based on a scoring system that rates several factors, e.g., daily ridership at the bus stop, if the stop is at a transfer corner, and the level of exposure to the weather at the stop. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2021, roughly 53% of MCTS shelters were in census tracts identified as predominantly minority.

Route guides and timetables are extensively distributed throughout the community. An entire set of all route guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them and may also access schedule information via a mobile phone or the internet. Passengers can purchase M-Cards and weekly or monthly passes at several grocery stores, gas stations, and banks/credit unions as well as on the new RideMCTS app.

**Service Availability** – The span of service, e.g., from 5:00 a.m. until 1:00 a.m., is equitably distributed among both minority and non-minority areas (2021 – Average Hours of the Day Served on Weekdays on page 11). No corridors identified as minority receives less than a 14-hour span of service on Weekdays. The average hours of the day served on routes identifies as minority is 20 hours, while non-minority was 19 hours.

### Service Policies

**Vehicle Assignment** – MCTS's fleet is fairly standardized with regard to amenities. Most of the fleet are 40-foot standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count on page 12). Since 2019, 53 Gillig coaches were added to the fleet with similar amenities as the New Flyer buses. All vehicles are available for use on any route and are assigned in no particular order.



**Transit Security** – The Director of Safety, Security and Training and Coordinator of Safety and Security work in collaboration to coordinate all security and emergency related functions for MCTS and ensures its compliance with all local, state, and federal security guidelines. Meetings are held regularly with local law enforcement and emergency management leaders to foster strong communication and collaborative relationships.

Response to incidents and patrolling of MCTS property and bus routes is provided by Allied Universal Security Services, a private security firm contracted by MTS. Allied Universal employs over 35 full and part-time transit security officers and provides on-site management of more than 1,864 hours of weekly service. Transit Security officers are available to respond to transit incidents 24/7/365. With direction from the Safety and Security Coordinator, Transit Security managers assign priority for bus riding to the routes and times of day where MCTS and local crime data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are analyzed monthly to aid the security team in the development of sound security deployment strategies.

The Safety, Security and Training Department along with representatives from the Transportation Department leadership meet monthly with representatives from the operator's union, station management and transit security to address and discuss security issues. The Transportation Security Committee meetings have been an extremely effective mechanism to ensure quality communication between bus operators and the security team.

To deter and detect criminal activity MCTS uses a 10-camera system with a 4-terabyte hard drive that will store weeks of video on board the bus. This system, provided by Apollo Video Systems, has 4 cameras that view the exterior of the bus on all sides and 6 high-definition, infrared cameras on the interior of the bus that record audio and video whenever the bus is in service. MCTS staff can request video from any bus in the fleet through a software interface and the video automatically downloads to a central server once the bus pulls into the station. This system has been an excellent addition to the transit security, customer service and risk management programs.

In 2008, MCTS partnered with the Milwaukee Police Department to secure a Transit Security Grant to install over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but MCTS can request video from these cameras at any time.

The Safety, Security and Training Department trains all new operators in safe passenger interaction techniques, conflict communication skills and emergency response to an active shooter. During this 4-hour class, the TSA also presents to operators their First Observer Plus program on suspicious activity recognition and reporting. MCTS is currently seeking a Transit Security Grant to secure funding for refresher training for all employees for awareness of suspicious persons, activity, and potential threats to our transportation infrastructure.



**2021 Title VI Route Evaluation**  
**Weekday Average Maximum Load Factors**  
**For Regular Routes During AM and PM Peak Periods**

<u>Route</u>	<u>Name</u>	<u>AM Load</u>	<u>PM Load</u>
<b>Minority</b>			
RED	Capitol Drive	25	23
BLU	Fond du Lac - Mill	19	20
PUR	27th Street	20	38
11	Hampton Avenue	7	8
12	Teutonia Avenue	14	22
14	Forest Home/Humboldt	15	28
18	National - Greenfield	15	22
19	Dr. M.L.K - S. 13th	14	19
20	S. 20th Street	47	17
21	North Avenue	10	15
22	Center Street	37	35
30	Sherman - Wisconsin	21	23
31	State - Highland	11	14
33	Vliet -84th	14	13
34	Hopkins - Congress	9	11
35	35th Street	16	20
54	Mitchell - Burnham	9	10
57	Walnut -Lisbon	21	20
58	Villard Avenue	11	11
60	60th Street	14	24
63	Silver Spring-Pt. Washington	13	19
66	Burleigh Street	16	22
76	76th Street	19	20
80	6th - Green Bay	25	16
88	Brown Deer	10	12
92	92nd Street	15	24
<b>Group Average</b>		<b>17</b>	<b>19</b>
<b>Non-Minority</b>			
GRE	Oakland-Howell	17	27
GOL	Wisconsin	16	24
15	Holton - Kinnickinnic	18	27
28	108th Street	9	12
51	Oklahoma Avenue	26	36
52	Clement-Pennsylvania	5	7
53	Lincoln Avenue	12	16
55	Layton Avenue	12	13
56	Greenfield - 43rd	9	12
68	Port Washington	6	6
<b>Group Average</b>		<b>13</b>	<b>18</b>

Data is for Fall of 2021 service from 2021 HASTUS Multiple Vehicle Schedule. Maximum loads are based on the average of maximum number of people aboard each trip from 6am-9am or 3pm-6pm in the peak direction from APC route trip list report data for Fall of 2021. Load Factor is calculated by taking the average of the peak period, peak direction maximum trip loads divided by the number of seats on a standard 40-foot bus (35 seats). Reference from Ridecheck ridership report by "Statistics by Route and Time Period".



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## 2021 Title VI Route Evaluation Weekday Average Headways for Regular Routes

Route Minority	Name	AM HW	MD HW	PM HW	EV HW	LN HW
RED	Capitol Drive	12	13	12	15	21
BLU	Fond du Lac - Mill	15	15	15	33	32
PUR	27th Street	12	11	12	17	24
11	Hampton Avenue	22	23	23	31	30
12	Teutonia Avenue	15	15	15	19	33
14	Forest Home/Humboldt	19	21	19	24	29
18	National - Greenfield	15	15	15	18	22
19	Dr. M.L.K - S. 13th	15	15	14	16	22
20	S. 20th Street	37	39	40	39	N/A
21	North Avenue	13	13	13	18	28
22	Center Street	28	23	29	34	32
30	Sherman - Wisconsin	12	13	13	18	21
31	State - Highland	30	31	32	33	40
33	Vliet - 84th	27	29	28	35	38
34	Hopkins - Congress	30	26	26	33	37
35	35th Street	15	15	15	17	25
54	Mitchell - Burnham	33	25	32	38	43
57	Walnut - Lisbon	25	25	25	31	31
58	Villard Avenue	29	21	23	31	29
60	60th Street	16	15	15	19	35
63	Silver Spring-Pt. Washington	22	23	23	27	32
66	Burleigh Street	24	26	26	27	47
76	76th Street	15	16	15	25	30
80	6th - Green Bay	15	15	15	25	28
88	Brown Deer	20	21	22	27	27
92	92nd Street	37	37	32	36	35
<b>Group Average</b>		<b>21</b>	<b>21</b>	<b>21</b>	<b>26</b>	<b>31</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	14	14	15	21	27
GOL	Wisconsin	15	16	16	20	31
15	Holton - Kinnickinnic	15	15	15	19	29
28	108th Street	42	42	44	60	58
51	Oklahoma Avenue	14	14	14	19	25
52	Clement-Pennsylvania	40	39	36	36	N/A
53	Lincoln Avenue	20	25	21	26	35
55	Layton Avenue	34	32	36	35	48
56	Greenfield - 43rd	26	28	28	36	34
68	Port Washington	30	31	30	30	N/A
<b>Group Average</b>		<b>25</b>	<b>26</b>	<b>26</b>	<b>30</b>	<b>36</b>

Data is for Fall of 2021 service from 2021 HASTUS Multiple Vehicle Schedule. N/A indicates no service in that time period.



### 2021 Title VI Route Evaluation Saturday Average Headways for Regular Routes

<u>Route</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
<b>Minority</b>						
RED	Capitol Drive	18	16	16	19	23
BLU	Fond du Lac - Mill	18	19	20	31	31
PUR	27th Street	17	14	13	18	24
11	Hampton Avenue	30	21	21	27	27
12	Teutonia Avenue	28	20	21	25	30
14	Forest Home/Humboldt	23	21	21	30	30
18	National - Greenfield	23	21	21	19	21
19	Dr. M.L.K - S. 13th	23	20	20	25	26
20	S. 20th Street	71	37	37	36	N/A
21	North Avenue	21	15	16	15	29
22	Center Street	33	29	27	34	32
30	Sherman - Wisconsin	16	13	14	18	22
31	State - Highland	26	27	27	38	38
33	Vliet -84th	27	27	27	33	36
34	Hopkins - Congress	32	34	34	34	47
35	35th Street	19	19	20	28	30
54	Mitchell - Burnham	29	29	29	36	40
57	Walnut -Lisbon	29	24	25	30	29
58	Villard Avenue	38	32	32	28	28
60	60th Street	24	24	24	27	35
63	Silver Spring-Pt. Washington	21	22	22	29	30
66	Burleigh Street	27	28	28	26	35
76	76th Street	23	23	25	32	36
80	6th - Green Bay	20	21	21	23	27
88	Brown Deer	18	19	19	26	26
92	92nd Street	36	37	38	37	43
<b>Group Average</b>		<b>27</b>	<b>24</b>	<b>24</b>	<b>28</b>	<b>31</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	21	20	20	20	27
GOL	Wisconsin	25	22	22	25	30
15	Holton - Kinnickinnic	21	19	20	22	28
28	108th Street	36	41	42	59	58
51	Oklahoma Avenue	25	26	26	24	24
52	Clement-Pennsylvania	38	37	35	36	N/A
53	Lincoln Avenue	38	27	27	38	36
55	Layton Avenue	32	35	35	32	44
56	Greenfield - 43rd	34	33	27	30	32
68	Port Washington	28	28	26	26	N/A
<b>Group Average</b>		<b>30</b>	<b>29</b>	<b>28</b>	<b>31</b>	<b>35</b>

Data is for Fall of 2021 service from 2021 HASTUS Multiple Vehicle Schedule. N/A indicates no service in that time period.



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## 2021 Title VI Route Evaluation Sunday Average Headways for Regular Routes

<u>Route</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
<b>Minority</b>						
RED	Capitol Drive	26	16	16	20	24
BLU	Fond du Lac - Mill	26	24	26	30	28
PUR	27th Street	23	15	15	17	23
11	Hampton Avenue	29	31	31	29	28
12	Teutonia Avenue	34	25	29	30	27
14	Forest Home/Humboldt	30	26	27	29	27
18	National - Greenfield	22	23	24	22	22
19	Dr. M.L.K - S. 13th	30	25	23	23	35
20	S. 20th Street	67	41	34	34	N/A
21	North Avenue	28	15	17	21	26
22	Center Street	31	36	36	34	32
30	Sherman - Wisconsin	24	16	13	18	26
31	State - Highland	36	26	27	32	36
33	Vliet -84th	35	36	36	34	45
34	Hopkins - Congress	31	32	33	32	29
35	35th Street	25	25	25	28	36
54	Mitchell - Burnham	37	32	28	33	38
57	Walnut -Lisbon	31	25	24	26	29
58	Villard Avenue	29	30	30	28	28
60	60th Street	34	27	27	30	36
63	Silver Spring-Pt. Washington	29	22	21	28	28
66	Burleigh Street	31	27	27	39	38
76	76th Street	23	25	24	30	32
80	6th - Green Bay	23	24	24	28	27
88	Brown Deer	24	28	27	25	25
92	92nd Street	44	41	36	39	44
<b>Group Average</b>		<b>31</b>	<b>27</b>	<b>26</b>	<b>28</b>	<b>31</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	30	24	25	26	36
GOL	Wisconsin	28	29	29	28	34
15	Holton - Kinnickinnic	28	24	22	29	30
28	108th Street	54	42	39	54	54
51	Oklahoma Avenue	24	25	25	31	35
52	Clement-Pennsylvania	36	37	36	33	N/A
53	Lincoln Avenue	36	38	38	36	36
55	Layton Avenue	44	33	34	45	45
56	Greenfield - 43rd	31	37	37	32	32
68	Port Washington	55	32	28	26	N/A
<b>Group Average</b>		<b>37</b>	<b>32</b>	<b>31</b>	<b>34</b>	<b>38</b>

Data is for Fall of 2021 service from 2021 HASTUS Multiple Vehicle Schedule. N/A indicates no service in that time period.



**2021 MCTS System Monthly On-Time Performance  
Averaged by Day and Time**

<b>Fixed Route On-Time Performance (2021)</b>	<u>Jan</u>
	86.5%
	<u>Feb</u>
	85.0%
	<u>Mar</u>
	86.9%
	<u>Apr</u>
	86.2%
	<u>May</u>
	84.3%
	<u>Jun</u>
	83.8%
<u>Jul</u>	
82.1%	
<u>Aug</u>	
81.6%	
<u>Sep</u>	
82.3%	
<u>Oct</u>	
83.4%	
<u>Nov</u>	
84.8%	
<u>Dec</u>	
85.4%	
<b>Average</b>	<b><u>84.4%</u></b>



**2021 Title VI Route Evaluation  
Weekday Bus Hours and PBH**

<u>Route</u>	<u>Name</u>	<u>Type of Route</u>	<u>Avg. Ridership</u>	<u>Bus Hours</u>	<u>PBH</u>
<b>Minority</b>					
RED	Capitol Drive	Regular	3287	170	19
BLU	Fond du Lac - Mill	Regular	1931	138	14
PUR	27th Street	Regular	4582	231	20
11	Hampton Avenue	Regular	525	52	10
12	Teutonia Avenue	Regular	1744	117	15
14	Forest Home/Humboldt	Regular	2549	159	16
18	National - Greenfield	Regular	2658	123	22
19	Dr. M.L.K - S. 13th	Regular	2701	178	15
20	S. 20th Street	Regular	358	28	13
21	North Avenue	Regular	2132	130	16
22	Center Street	Regular	1389	78	18
30	Sherman - Wisconsin	Regular	4972	223	22
31	State - Highland	Regular	536	50	11
33	Vliet -84th	Regular	507	47	11
34	Hopkins - Congress	Regular	596	69	9
35	35th Street	Regular	2145	162	13
54	Mitchell - Burnham	Regular	771	59	13
57	Walnut -Lisbon	Regular	1003	79	13
58	Villard Avenue	Regular	485	51	10
60	60th Street	Regular	1533	152	10
63	Silver Spring-Pt. Washington	Regular	871	54	16
66	Burleigh Street	Regular	1340	73	18
76	76th Street	Regular	2276	177	13
80	6th - Green Bay	Regular	2317	180	13
88	Brown Deer	Regular	415	49	8
92	92nd Street	Regular	696	88	8
<b>Group Average</b>				<b>112</b>	<b>14</b>
<b>Non-Minority</b>					
GRE	Oakland-Howell	Regular	3308	195	17
GOL	Wisconsin	Regular	2706	170	16
15	Holton - Kinnickinnic	Regular	2752	162	17
28	108th Street	Regular	496	50	10
51	Oklahoma Avenue	Regular	1421	99	14
52	Clement-Pennsylvania	Regular	220	28	8
53	Lincoln Avenue	Regular	1023	65	16
55	Layton Avenue	Regular	562	52	11
56	Greenfield - 43rd	Regular	654	51	13
68	Port Washington		226	27	9
<b>Group Average</b>				<b>90</b>	<b>13</b>





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## 2021 Title VI Route Evaluation Average Hours of the Day Served on Weekdays

<u>Route</u>	<u>Name</u>	<u>Type of Route</u>	<u>Hours of Day</u>
<b>Minority</b>			
RED	Capitol Drive	Regular	21
BLU	Fond du Lac - Mill	Regular	21
PUR	27th Street	Regular	22
11	Hampton Avenue	Regular	21
12	Teutonia Avenue	Regular	20
14	Forest Home/Humboldt	Regular	20
18	National - Greenfield	Regular	22
19	Dr. M.L.K - S. 13th	Regular	21
20	S. 20th Street	Regular	14
21	North Avenue	Regular	21
22	Center Street	Regular	20
30	Sherman - Wisconsin	Regular	21
31	State - Highland	Regular	18
33	Vliet -84th	Regular	18
34	Hopkins - Congress	Regular	20
35	35th Street	Regular	20
54	Mitchell - Burnham	Regular	20
57	Walnut -Lisbon	Regular	20
58	Villard Avenue	Regular	20
60	60th Street	Regular	20
63	Silver Spring-Pt. Washington	Regular	20
66	Burleigh Street	Regular	21
76	76th Street	Regular	21
80	6th - Green Bay	Regular	21
88	Brown Deer	Regular	19
92	92nd Street	Regular	20
<b>Group Average</b>			<b>20</b>
<b>Non-Minority</b>			
GRE	Oakland-Howell	Regular	23
GOL	Wisconsin	Regular	21
15	Holton - Kinnickinnic	Regular	22
28	108th Street	Regular	18
51	Oklahoma Avenue	Regular	20
52	Clement-Pennsylvania	Regular	14
53	Lincoln Avenue	Regular	19
55	Layton Avenue	Regular	17
56	Greenfield - 43rd	Regular	21
68	Port Washington	Regular	13
<b>Group Average</b>			<b>19</b>

Data is for Fall of 2021 service from 2021 MCTS Quarterly Route Evaluation Summary



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## BUS COUNT EFFECTIVE AS OF 12/28/2021

12/28/2021

	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer	2014 New Flyer	2015 New Flyer	2016 New Flyer	2017 New Flyer	2019 Gillig	2020 Gillig
<b>Fond du Lac</b>	5101-5102 5105 5107	5200 5203 5206-5209	5300 5302-5315 5317-5319	5448-5454	5500-5534	5615 5618-5627	5700-5719		5900-5927	
<b>Garage</b>	5109-5110 5112 5126 5146 5156 5162 5174 5187	5211 5214-5218 5220 5222-5234	5321-5333 5335-5341 5343-5354							
<b>190</b>	13	26	50	7	35	11	20	0	28	0
<b>Kinnickinnic</b>	5117 5119 5121-5122 5124-5125 5127 & 5129			5400-5447		5600-5614 5616-5617	5720-5729	5800- 5814		6000-6022
<b>Garage</b>	5131-5133 5135-5136 5137 5139-5140 5142-5143 5148 5151-5155 5158-5160 5163-5169 5172 5175-5180 5183-5185 5189									
<b>158</b>	45	0	0	48	0	17	10	15	0	23
<b>Active Buses</b>	58	26	50	55	35	28	30	15	28	23
<b>MCTS Buses</b>	<b>348</b>									

5100-5189	2010	58	40 / 39
5200-5234	2011	26	40 / 39
5300-5354	2012	50	40 / 39
5400-5454	2013	55	40 / 39
5500-5534	2014	35	40 / 39
5600-5627	2015	28	40 / 35
5700-5729	2016	30	40 / 36
5800-5814	2017	15	40 / 36
5900-5927	2019	28	40 / 36
6000-6022	2020	23	40 / 36
		<b>348</b>	

STORED AT FD: 5801 Summerfest bus  
 OUT OF SERVICE: 5116, 5128, 5150, 5157, 5171, 5204, 5316, 5320, 5342  
 DELIVERED BUSES: 6100, 6101, 6102, 6103, 6104, 6105, 6106, 6107, 6108, 6109, 6110, 6111, 6112

Out of Service Buses: 9

Total Active Buses:   
 Out of Service Buses:   
 Grand Total:

Aver. Fleet Age As of  
 Average Age: 8.16 2021



**Milwaukee County Transit System  
Interoffice Memorandum**

**TO:** File

**FROM:** Emmanuel Okoro – Transit Planner

**SUBJECT:** 2022 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

**DATE:** January 13th, 2023

Planning staff have annually compared the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the “Level of Service Methodology” section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2022 schedule period.

For the purposes of assessing compliance with Title VI, a census tract was identified as minority if the concentration of minority residents in that tract exceeded the countywide average for minority residents. According to U.S. Census statistics from 2010, 45.7% of the population of Milwaukee County is made up of ethnic minorities who are not white and not Hispanic. Similarly, census tracts with a percentage of minority residents less than the countywide average were identified as a non-minority tract. Given these definitions, each MCTS bus route was identified as primarily serving:

- Minority areas
  - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
  - If < 33.3% of the route mileage operated within minority tracts

**Service Standards**

**Vehicle Load** - Average maximum loads were calculated during the a.m. and p.m. peak periods for each regular route (see table – 2022 Weekday Average Maximum Load on page 4). All regular routes are well below the 1.3 standard. The highest maximum loads were on routes that traveled through areas that served minority populations, however these load factors were still well below the standard.

**Vehicle Headways** – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (see table – 2022 Average headways for Regular Routes on pages 5-8).



**On Time Performance** - All operators are required to meet an on-time performance standard of being between two minutes early and five minutes late at a time point. MCTS regularly monitors on-time performance throughout the system. MCTS has set a system wide on-time standard of 90%. Data from 2022 shows that averaged 81.7% over the year (see table – 2022 MCTS System On-Time Performance on page 9).

**Distribution of Transit Amenities** – The supply and demand for transit service is measured according to the number of passengers per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see table – 2022 Weekday Bus Hours and PBH on page 10). While the passengers per bus hour is higher on routes that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

The distribution of bus shelters is based on a scoring system that rates several factors, e.g., daily ridership at the bus stop, if the stop is at a transfer corner, and the level of exposure to the weather at the stop. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2022, roughly 53% of MCTS shelters were in census tracts identified as predominantly minority.

Route guides and timetables are extensively distributed throughout the community. An entire set of all route guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them and may also access schedule information via a mobile phone or the internet. Passengers can purchase M-Cards/UMO Cards and weekly or monthly passes at several grocery stores, gas stations, and banks/credit unions as well as on the new UMO app.

**Service Availability** – The span of service, e.g., from 5:00 a.m. until 1:00 a.m., is equitably distributed among both minority and non-minority areas (2022 – Average Hours of the Day Served on Weekdays on page 11). No corridors identified as minority receives less than a 14-hour span of service on Weekdays. The average hours of the day served on routes identifies as minority is 20 hours, while non-minority was 19 hours.

## Service Policies

**Vehicle Assignment** – MCTS’s fleet is fairly standardized with regard to amenities. Most of the fleet are 40-foot standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count on page 12). Since 2019, 98 Gillig coaches were added to the fleet with similar amenities as the New Flyer buses. All vehicles are available for use on any route and are assigned in no particular order.



**Transit Security** – The Director of Safety, Security and Training and Coordinator of Safety and Security work in collaboration to coordinate all security and emergency related functions for MCTS and ensures its compliance with all local, state, and federal security guidelines. Meetings are held regularly with local law enforcement and emergency management leaders to foster strong communication and collaborative relationships.

Response to incidents and patrolling of MCTS property and bus routes is provided by Allied Universal Security Services, a private security firm contracted by MTS. Allied Universal employs over 35 full and part-time transit security officers and provides on-site management of more than 1,864 hours of weekly service. Transit Security officers are available to respond to transit incidents 24/7/365. With direction from the Safety and Security Coordinator, Transit Security managers assign priority for bus riding to the routes and times of day where MCTS and local crime data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are analyzed monthly to aid the security team in the development of sound security deployment strategies.

The Safety, Security and Training Department along with representatives from the Transportation Department leadership meet monthly with representatives from the operator's union, station management and transit security to address and discuss security issues. The Transportation Security Committee meetings have been an extremely effective mechanism to ensure quality communication between bus operators and the security team.

To deter and detect criminal activity MCTS uses a 10-camera system with a 4-terabyte hard drive that will store weeks of video on board the bus. This system, provided by Apollo Video Systems, has 4 cameras that view the exterior of the bus on all sides and 6 high-definition, infrared cameras on the interior of the bus that record audio and video whenever the bus is in service. MCTS staff can request video from any bus in the fleet through a software interface and the video automatically downloads to a central server once the bus pulls into the station. This system has been an excellent addition to the transit security, customer service and risk management programs.

In 2008, MCTS partnered with the Milwaukee Police Department to secure a Transit Security Grant to install over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but MCTS can request video from these cameras at any time.

The Safety, Security and Training Department trains all new operators in safe passenger interaction techniques, conflict communication skills and emergency response to an active shooter. During this 4-hour class, the TSA also presents to operators their First Observer Plus program on suspicious activity recognition and reporting. MCTS is currently seeking a Transit Security Grant to secure funding for refresher training for all employees for awareness of suspicious persons, activity, and potential threats to our transportation infrastructure.



# Milwaukee County Transit System

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## 2022 Title VI Route Evaluation Weekday Average Maximum Load Factors For Regular Routes During AM and PM Peak Periods

<u>Route</u> <b>Minority</b>	<u>Name</u>	<u>AM Load</u>	<u>PM Load</u>
RED	Capitol Drive	25	29
BLU	Fond du Lac - Mill	21	21
PUR	27th Street	25	34
11	Hampton Avenue	9	10
12	Teutonia Avenue	16	18
14	Forest Home/Humboldt	24	26
18	National - Greenfield	17	29
19	Dr. M.L.K - S. 13th	16	19
20	S. 20th Street	34	14
21	North Avenue	14	20
22	Center Street	20	20
30	Sherman - Wisconsin	22	31
31	State - Highland	11	17
33	Vliet - 84th	13	14
34	Hopkins - Congress	12	11
35	35th Street	16	22
54	Mitchell - Burnham	10	14
57	Walnut -Lisbon	23	22
58	Villard Avenue	8	8
60	60th Street	24	28
63	Silver Spring-Pt. Washington	16	17
66	Burleigh Street	12	17
76	76th Street	17	21
80	6th - Green Bay	19	19
88	Brown Deer	7	11
92	92nd Street	13	13
<b>Group Average</b>		<b>17</b>	<b>19</b>
<b>Non-Minority</b>			
GRE	Oakland-Howell	24	24
GOL	Wisconsin	20	25
15	Holton - Kinnickinnic	21	26
28	108th Street	9	12
51	Oklahoma Avenue	24	28
52	Clement-Pennsylvania	8	7
53	Lincoln Avenue	11	14
55	Layton Avenue	14	23
56	Greenfield - 43rd	8	11
68	Port Washington	6	5
<b>Group Average</b>		<b>15</b>	<b>18</b>

Data is for Fall of 2022 service from 2022 HASTUS Multiple Vehicle Schedule. Maximum loads are based on the average of maximum number of people aboard each trip from 6am-9am or 3pm-6pm in the peak direction from APC route trip list report data for Fall of 2022. Load Factor is calculated by taking the average of the peak period, peak direction maximum trip loads divided by the number of seats on a standard 40-foot bus (35 seats). Reference from Ridecheck ridership report by "Statistics by Route and Time Period".



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## 2022 Title VI Route Evaluation Weekday Average Headways for Regular Routes

<u>Route</u> <u>Minority</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
RED	Capitol Drive	15	15	15	20	20
BLU	Fond du Lac - Mill	15	15	15	28	32
PUR	27th Street	12	10	11	16	22
11	Hampton Avenue	30	30	30	31	30
12	Teutonia Avenue	15	15	15	25	36
14	Forest Home/Humboldt	18	19	19	28	31
18	National - Greenfield	13	14	14	20	30
19	Dr. M.L.K - S. 13th	14	14	15	24	27
20	S. 20th Street	39	40	40	N/A	N/A
21	North Avenue	13	13	14	20	28
22	Center Street	27	22	22	35	34
30	Sherman - Wisconsin	12	12	12	15	22
31	State - Highland	32	30	30	31	40
33	Vliet -84th	27	28	28	36	36
34	Hopkins - Congress	25	26	26	34	32
35	35th Street	15	15	15	23	25
54	Mitchell - Burnham	29	30	30	35	36
57	Walnut -Lisbon	25	22	22	32	45
58	Villard Avenue	38	25	27	38	35
60	60th Street	15	15	15	25	35
63	Silver Spring-Pt. Washington	23	23	23	23	31
66	Burleigh Street	17	18	20	28	35
76	76th Street	15	15	15	24	30
80	6th - Green Bay	15	15	15	23	26
88	Brown Deer	20	20	21	27	27
92	92nd Street	29	31	32	41	47
<b>Group Average</b>		<b>21</b>	<b>20</b>	<b>21</b>	<b>27</b>	<b>32</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	14	14	14	19	26
GOL	Wisconsin	15	15	15	15	20
15	Holton - Kinnickinnic	15	15	15	22	32
28	108th Street	27	30	30	41	53
51	Oklahoma Avenue	14	13	14	23	34
52	Clement-Pennsylvania	40	40	36	N/A	N/A
53	Lincoln Avenue	20	20	21	30	38
55	Layton Avenue	33	25	26	31	42
56	Greenfield - 43rd	26	28	28	37	35
68	Port Washington	30	30	30	N/A	N/A
<b>Group Average</b>		<b>23</b>	<b>23</b>	<b>23</b>	<b>27</b>	<b>35</b>

Data is for Fall of 2022 service from 2022 HASTUS Multiple Vehicle Schedule. N/A indicates no service in that time period.



# Milwaukee County Transit System

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## 2022 Title VI Route Evaluation Saturday Average Headways for Regular Routes

<u>Route</u> <u>Minority</u>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
RED	Capitol Drive	18	16	16	19	23
BLU	Fond du Lac - Mill	18	19	20	31	31
PUR	27th Street	17	14	13	18	24
11	Hampton Avenue	30	21	21	27	27
12	Teutonia Avenue	31	22	22	28	34
14	Forest Home/Humboldt	23	21	21	30	30
18	National - Greenfield	27	21	21	22	28
19	Dr. M.L.K - S. 13th	21	20	20	29	34
20	S. 20th Street	74	38	38	36	N/A
21	North Avenue	21	15	16	15	29
22	Center Street	33	29	27	34	32
30	Sherman - Wisconsin	16	13	14	18	22
31	State - Highland	26	27	27	35	39
33	Vliet -84th	42	42	41	38	39
34	Hopkins - Congress	32	34	34	34	47
35	35th Street	19	20	20	27	31
54	Mitchell - Burnham	36	36	36	35	35
57	Walnut -Lisbon	25	24	24	28	39
58	Villard Avenue	38	32	32	28	28
60	60th Street	23	24	24	29	32
63	Silver Spring-Pt. Washington	30	32	32	31	31
66	Burleigh Street	22	21	21	25	35
76	76th Street	23	23	25	32	36
80	6th - Green Bay	20	21	21	25	31
88	Brown Deer	27	30	29	28	28
92	92nd Street	36	37	38	37	43
<b>Group Average</b>		<b>28</b>	<b>25</b>	<b>25</b>	<b>28</b>	<b>32</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	21	20	20	20	27
GOL	Wisconsin	25	22	22	25	30
15	Holton - Kinnickinnic	21	19	20	22	28
28	108th Street	37	39	42	55	52
51	Oklahoma Avenue	20	20	20	25	36
52	Clement-Pennsylvania	38	37	35	36	N/A
53	Lincoln Avenue	38	27	27	38	36
55	Layton Avenue	29	30	30	28	36
56	Greenfield - 43rd	34	33	27	30	32
68	Port Washington	41	27	27	27	N/A
<b>Group Average</b>		<b>30</b>	<b>27</b>	<b>27</b>	<b>31</b>	<b>35</b>

Data is for Fall of 2022 service from 2022 HASTUS Multiple Vehicle Schedule. N/A indicates no service in that time period.





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## 2022 Title VI Route Evaluation Sunday Average Headways for Regular Routes

<u>Route</u> <b>Minority</b>	<u>Name</u>	<u>AM HW</u>	<u>MD HW</u>	<u>PM HW</u>	<u>EV HW</u>	<u>LN HW</u>
RED	Capitol Drive	24	17	16	20	22
BLU	Fond du Lac - Mill	26	24	26	30	28
PUR	27th Street	23	15	15	17	23
11	Hampton Avenue	29	31	31	29	28
12	Teutonia Avenue	28	27	31	34	39
14	Forest Home/Humboldt	30	26	27	29	27
18	National - Greenfield	23	23	25	22	28
19	Dr. M.L.K - S. 13th	30	23	23	29	37
20	S. 20th Street	71	47	37	37	N/A
21	North Avenue	28	15	17	21	26
22	Center Street	31	36	36	34	32
30	Sherman - Wisconsin	24	16	13	18	26
31	State - Highland	37	28	27	31	38
33	Vliet -84th	39	40	39	37	49
34	Hopkins - Congress	31	32	33	32	29
35	35th Street	26	25	26	29	37
54	Mitchell - Burnham	34	35	36	36	51
57	Walnut -Lisbon	33	32	32	31	31
58	Villard Avenue	29	30	30	28	28
60	60th Street	24	25	26	35	37
63	Silver Spring-Pt. Washington	30	31	31	31	31
66	Burleigh Street	27	21	21	29	38
76	76th Street	23	25	24	30	32
80	6th - Green Bay	28	25	24	28	27
88	Brown Deer	24	28	27	25	25
92	92nd Street	44	41	36	39	44
<b>Group Average</b>		<b>31</b>	<b>28</b>	<b>27</b>	<b>29</b>	<b>33</b>
<b>Non-Minority</b>						
GRE	Oakland-Howell	30	24	25	26	36
GOL	Wisconsin	28	29	29	28	34
15	Holton - Kinnickinnic	28	24	22	29	30
28	108th Street	54	41	44	53	53
51	Oklahoma Avenue	25	21	20	25	36
52	Clement-Pennsylvania	36	37	36	33	N/A
53	Lincoln Avenue	36	38	38	36	36
55	Layton Avenue	41	30	28	35	38
56	Greenfield - 43rd	31	37	37	32	32
68	Port Washington	56	32	28	25	N/A
<b>Group Average</b>		<b>37</b>	<b>31</b>	<b>31</b>	<b>32</b>	<b>37</b>

Data is for Fall of 2022 service from 2022 HASTUS Multiple Vehicle Schedule. N/A indicates no service in that time period.



## 2022 MCTS System Monthly On-Time Performance Averaged by Day and Time

<b>Fixed Route</b>	<u>Jan</u>
<b>On-Time Performance (2022)</b>	87.4%
	<u>Feb</u>
	85.5%
	<u>Mar</u>
	86.0%
	<u>Apr</u>
	85.2%
	<u>May</u>
	83.8%
	<u>Jun</u>
	68.2%
	<u>Jul</u>
	81.9%
	<u>Aug</u>
	82.4%
	<u>Sep</u>
	80.6%
	<u>Oct</u>
	82.9%
	<u>Nov</u>
	78.4%
	<u>Dec</u>
	78.3%
<b>Average</b>	<b>81.7%</b>



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## 2022 Title VI Route Evaluation Weekday Bus Hours and PBH

<u>Route</u> <u>Minority</u>	<u>Name</u>	<u>Type of Route</u>	<u>Avg. Ridership</u>	<u>Bus Hours</u>	<u>PBH</u>
RED	Capitol Drive	Regular	4363	168	26
BLU	Fond du Lac - Mill	Regular	2249	137	16
PUR	27th Street	Regular	5373	231	23
11	Hampton Avenue	Regular	783	53	15
12	Teutonia Avenue	Regular	2331	127	18
14	Forest Home/Humboldt	Regular	2821	157	18
18	National - Greenfield	Regular	2921	135	22
19	Dr. M.L.K - S. 13th	Regular	3386	189	18
20	S. 20th Street	Regular	359	29	12
21	North Avenue	Regular	2774	130	21
22	Center Street	Regular	1269	79	16
30	Sherman - Wisconsin	Regular	6009	223	27
31	State - Highland	Regular	719	50	14
33	Vliet -84th	Regular	627	47	13
34	Hopkins - Congress	Regular	791	69	11
35	35th Street	Regular	2808	161	17
54	Mitchell - Burnham	Regular	1222	73	17
57	Walnut -Lisbon	Regular	1455	82	18
58	Villard Avenue	Regular	506	49	10
60	60th Street	Regular	1943	165	12
63	Silver Spring-Pt. Washington	Regular	1194	53	23
66	Burleigh Street	Regular	1773	99	18
76	76th Street	Regular	2914	172.0	17
80	6th - Green Bay	Regular	2697	191.0	14
88	Brown Deer	Regular	568	50.0	11
92	92nd Street	Regular	941	90.0	10
<b>Group Average</b>			<b>2108</b>	<b>116</b>	<b>17</b>
<b>Non-Minority</b>					
GRE	Oakland-Howell	Regular	3891	194	20
GOL	Wisconsin	Regular	3196	170	19
15	Holton - Kinnickinnic	Regular	3172	162	20
28	108th Street	Regular	756	65	12
51	Oklahoma Avenue	Regular	1784	95	19
52	Clement-Pennsylvania	Regular	247	28.0	9
53	Lincoln Avenue	Regular	1099	69.0	16
55	Layton Avenue	Regular	814	58.0	14
56	Greenfield - 43rd	Regular	750	51.5	15
68	Port Washington	Regular	314	26	12
<b>Group Average</b>			<b>1602</b>	<b>92</b>	<b>15</b>

Data is for Fall of 2022 service from 2022 MCTS Quarterly Route Evaluation Summary



**2022 Title VI Route Evaluation**  
**Average Hours of the Day Served on Weekdays**

<u>Route</u>	<u>Name</u>	<u>Type of Route</u>	<u>Hours of Day</u>
<b>Minority</b>			
RED	Capitol Drive	Regular	21
BLU	Fond du Lac - Mill	Regular	21
PUR	27th Street	Regular	21
11	Hampton Avenue	Regular	19
12	Teutonia Avenue	Regular	20
14	Forest Home/Humboldt	Regular	20
18	National - Greenfield	Regular	22
19	Dr. M.L.K - S. 13th	Regular	21
20	S. 20th Street	Regular	14
21	North Avenue	Regular	21
22	Center Street	Regular	20
30	Sherman - Wisconsin	Regular	21
31	State - Highland	Regular	18
33	Vliet -84th	Regular	18
34	Hopkins - Congress	Regular	20
35	35th Street	Regular	20
54	Mitchell - Burnham	Regular	19
57	Walnut -Lisbon	Regular	20
58	Villard Avenue	Regular	19
60	60th Street	Regular	20
63	Silver Spring-Pt. Washington	Regular	20
66	Burleigh Street	Regular	20
76	76th Street	Regular	20
80	6th - Green Bay	Regular	20
88	Brown Deer	Regular	19
92	92nd Street	Regular	19
<b>Group Average</b>			<b>20</b>
<b>Non-Minority</b>			
GRE	Oakland-Howell	Regular	23
GOL	Wisconsin	Regular	20
15	Holton - Kinnickinnic	Regular	22
28	108th Street	Regular	19
51	Oklahoma Avenue	Regular	20
52	Clement-Pennsylvania	Regular	14
53	Lincoln Avenue	Regular	19
55	Layton Avenue	Regular	18
56	Greenfield - 43rd	Regular	19
68	Port Washington	Regular	13
<b>Group Average</b>			<b>19</b>

Data is for Fall of 2022 service from 2022 MCTS Quarterly Route Evaluation Summary



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## BUS COUNT EFFECTIVE AS OF 12/6/2022

12/6/2022

	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer	2014 New Flyer	2015 New Flyer	2016 New Flyer	2017 New Flyer	2019 Gillig	2020 Gillig	2021 Gillig	2022 Gillig
Fond du Lac	5174	5209	5302-5310		5500-5534		5700-5719		5900-5927		6100-6113	6200-6229
Garage		5211 5215 5217 5220 5224 5228-5230 5232-5233	5312-5315 5317-5319 5322-5333 5335-5341 5344-5352 5354									
184	1	11	45	0	35	0	20	0	28	0	14	30
Kinnickinnic	5119 5126 5129			5400-5454		5600-5627	5720-5729	5800-5814		6000-6014 6016-6022		6230-6255
Garage	5132-5133 5142-5143 5148 5153 5159-5160 5163 5168 5172 5177 5183 5185 5189											6256-6258 buses not delivered yet
152	18	0	0	55	0	28	10	15	0	22	0	4
Active Buses	19	11	45	55	35	28	30	15	28	22	14	34
MCTS Buses 336												

5100-5189	2010	19	40 / 39
5200-5234	2011	11	40 / 39
5300-5354	2012	45	40 / 39
5400-5454	2013	55	40 / 39
5500-5534	2014	35	40 / 39
5600-5627	2015	28	40 / 35
5700-5729	2016	30	40 / 36
5800-5814	2017	15	40 / 36
5900-5927	2019	28	40 / 36
6000-6022	2020	22	40 / 36
6100-6113	2021	14	40 / 36
6200-6229	2022	30	40 / 36
6230-6258	2022	4	40 / 36
		336	

Averq. Fleet Age As of  
Average Age: 6.45

STORED AT FD: 4801 Summerfest bus  
OUT OF SERVICE:  
5101, 5127, 5131, 5136, 5152, 5166, 5179, 5184  
5200, 5203, 5206, 5207, 5208, 5214, 5218, 5222, 5223, 5225, 5226, 5227, 5231, 5234  
5300, 5311, 5316, 5321, 5342, 5343, 5353, 6015

Out of Service Buses: 30

Total Active Buses: 336  
Out of Service Buses: 30  
Grand Total: 366



**Milwaukee County Transit System  
Interoffice Memorandum**

**TO:** File

**FROM:** Jesus Ochoa, Planning Manager, Service Development Department

**SUBJECT:** Executive Summary – Demographic / Service Profile Maps and Travel Surveys

**DATE:** 6/15/2023

MCTS collects racial and ethnic population data to understand rider characteristics and travel patterns. MCTS maintains and updates this information as part of routine planning activities.

According to 2018 data from the American Community Survey, the minority population represents 40.3% of the total population in the MCTS service area (see map on page A-100). The majority of minority residents live in the north central and north west side of Milwaukee County. As depicted by this map, this area is served by several crosstown routes. In fact, a significant proportion of all transit service is operated in these areas.

The low-income population represents 19.9% of the County's total population (see map on page A-101). The majority of these residents live in the center of Milwaukee County as well as on the northwest side.

MCTS conducts a customer satisfaction travel survey every year to generate a rider profile and collect data on riders' opinions via our vendor NuStats. In collaboration with MCTS, NuStats designed a sampling plan to collect completed Customer Satisfaction surveys from frequent MCTS riders who responded to a postcard invitation mailed to their current residence. We also conducted on-bus public engagement surveys during the 2022 Budget process. You can see the Ridership Profile (at the end of this memo) that shows the 2022 versus 2021 comparisons.

The key findings from our 2022 travel survey were as follows:

- The largest proportion (62%) of respondents to the survey indicate they are White, followed by riders who identify themselves as Black/African-American (18%). 7% of riders identify themselves as Hispanic.
- The highest reported reason for riding the bus (35%) was to get to work. 28% reported they used the bus for social/recreational purposes and 8% to go to school. 6% said they rode for shopping trips or medical reasons.
- 19% of respondents reported they earned less than \$25,000 in total household income. 29% reported their income was \$50,000 or more.
- 30% of respondents say they are transit dependent as they do not have a driver's license.
- 76% of respondents stated they feel somewhat safe or very safe on our buses.
- 43% of respondents reported they have been using MCTS for 15 years or more. 13% have started riding within the past year.
- 94% of respondents would be very likely, likely or somewhat likely to recommend MCTS.



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- Overall, 74% of respondents reported having their overall bus service needs either met or exceeded by MCTS.

### MCTS Ridership Profile Data – 2021 vs. 2022

(Sample of completed Customer Service surveys from frequent MCTS riders)

Gender	2021	2022
Female	49.0%	46.0%
Male	43.0%	33.0%

Age	2021	2022
18 to 24	7.0%	7.0%
25 to 34	16.0%	19.0%
35 to 44	19.0%	19.0%
45 to 54	14.0%	16.0%
55 to 64	29.0%	17.0%
65 or over	24.0%	18.0%
Refused	2.0%	4.0%

Ethnicity	2021	2022
White	65.0%	62.0%
Black/African-American	15.0%	18.0%
Hispanic	7.0%	7.0%
Other	2.0%	2.0%
Refused	7.0%	8.0%

Education	2021	2022
Grade school or less	1%	0.03%
Some high school	3.0%	4.0%
High school graduate	17.0%	23.0%
Some Voc/Tech School	5.0%	3.0%
Voc/Tech degree	6.0%	5.0%
Some college	17.0%	20.0%
College graduate	27.0%	25.0%
Post Graduate	21.0%	16.0%
Refused	2.0%	4.0%



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Employment	2021	2022
Not employed	8.0%	9.0%
Full-time	46.0%	46.0%
Part-time	15.0%	14.0%
Student	9.0%	7.0%
Retired	26.0%	21.0%
Refused	5.0%	8.0%

Total Household Income	2022
Less than \$25,000	19.0%
\$25,000 to \$34,999	15.0%
\$35,000 to \$49,999	11.0%
\$50,000 to \$74,999	12.0%
\$75,000 to \$99,999	9.0%
\$100,000 to \$149,999	6.0%
\$150,000 or more	2.0%
Don't Know	3.0%
Prefer not to respond/refused	23.0%

Total Household Income	2021
Less than \$25,000	21.0%
\$25,000 to \$34,999	12.0%
\$35,000 to \$49,999	13.0%
\$50,000 to \$74,999	13.0%
\$75,000 to \$99,999	7.0%
\$100,000 to \$149,999	8.0%
\$150,000 or more	4.0%
Don't Know	2.0%
Prefer not to respond/refused	20.0%

Valid Driver's License	2021	2022
Yes	77.0%	70.0%
No	23.0%	30.0%





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Primary Language	2021	2022
English	93.0%	96.0%
Spanish	5.0%	2.0%
Hmong	0.0%	0.4%
German	0.3%	0.3%
Arabic	0.0%	0.3%
Chinese (Mandarin, etc.)	0.1%	0.0%
Hindi	1.0%	0.4%
Serbo-Croatian	0.3%	0.1%
French	0.02%	0.2%
African languages	0.02%	0.2%
Other	1.0%	0.3%

Disability	2021	2022
Difficulty walking/other physical impairment	11.0%	11.0%
Visual or hearing impairment	2.0%	2.0%
Cognitive impairment/fear of getting lost	1.0%	2.0%
None	85.0%	83.0%
Other	2.0%	2.0%

SERVICE USE		
Years Using MCTS for Transportation Needs	2021	2022
Less than 1 year	15.0%	13.0%
1 - 2 years	6.0%	8.0%
3-5 years	13.0%	11.0%
6-9 years	10.0%	9.0%
10-14 years	8.0%	8.0%
15 years or more	41.0%	43.0%
Don't know	7.0%	8.0%

Reasons Use Bus	2021	2022
Shopping	6.0%	9.0%
Social/recreational	26.0%	21.0%



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Work	34.0%	33.0%
Medical reasons	8.0%	8.0%
School	6.0%	6.0%
Job interviews/search	0.0%	2.0%
Other	18.0%	20.0%

Ride Bus or Use Alternative Transportation	2021	2022
Rarely have choices	17.0%	22.0%
Have some choices	22.0%	24.0%
Have choices most of time, use bus	11.0%	11.0%
Have choices all the time, use bus	28.0%	20.0%
Not sure	22.0%	24.0%

Alternative Means of Travel	2021	2022
Private Vehicle as Driver	46.0%	35.0%
Taxi/Rideshare (Uber, Lyft, etc.)	17.0%	20.0%
Walk	13.0%	16.0%
Private Vehicle as Passenger	10.0%	10.0%
I have no other means of travel	7.0%	11.0%
Bicycle, or other non-motorized means (skateboard, etc.)	6.0%	7.0%
The HOP streetcar	1.0%	2.0%
Motorcycle, moped	0.0%	0.0%

SAFETY AND SECURITY		
Personal Safety	2021	2022
Very Safe	34.0%	34.0%
Somewhat safe	40.0%	42.0%
Neither safe nor unsafe	17.0%	14.0%
Somewhat unsafe	8.0%	8.0%
Very unsafe	1.0%	2.0%

Presence of Security Measures on Bus	2021	2022
Doesn't Meet needs	6.0%	7.0%



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Nearly meets needs	15.0%	17.0%
Meets needs	64.0%	61.0%
Exceeds needs	14.0%	15.0%

Safety/Security Concern	2021	2022
Yes	10.0%	13.0%
No	61.0%	60.0%
No opinion	22.0%	22.0%
Other	8.0%	5.0%

CONSUMER SATISFACTION		
Overall, Would You Say The Milwaukee County Transit System ...	2021	2022
Exceeds needs	17.0%	16.0%
Meets needs	60.0%	58.0%
Nearly meets needs	17.0%	21.0%
Does not meet needs	6.0%	5.0%

MCTS Customer Service Satisfaction	2021	2022
Exceeds needs	N/A	16.0%
Meets needs	N/A	49.0%
Nearly meets needs	N/A	25.0%
Does not meet needs	N/A	10.0%

MCTS Recommendation	2021	2022
Very Likely	43.0%	46.0%
Likely	36.0%	34.0%
Somewhat Likely	16.0%	14.0%
Not Likely at all	5.0%	6.0%

Ease of getting detour/route information	2021	2022
Exceeds Needs	N/A	16.0%
Meets needs	N/A	49.0%
Nearly Meets Needs	N/A	25.0%



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<b>Doesn't Meet Needs</b>	N/A	10.0%
<b>Top 2</b>	N/A	65.0%

<b>Ease of getting MCARDS</b>	<b>2021</b>	<b>2022</b>
<b>Exceeds Needs</b>	18.0%	21.0%
<b>Meets needs</b>	58.0%	54.0%
<b>Nearly Meets Needs</b>	16.0%	18.0%
<b>Doesn't Meet Needs</b>	8.0%	7.0%
<b>Top 2</b>	76.0%	75.0%

<b>Ease of understanding info on the website</b>	<b>2021</b>	<b>2022</b>
<b>Exceeds Needs</b>	19.0%	20.0%
<b>Meets needs</b>	63.0%	56.0%
<b>Nearly Meets Needs</b>	15.0%	21.0%
<b>Doesn't Meet Needs</b>	3.0%	3.0%
<b>Top 2</b>	82.0%	75.0%

<b>PROPOSED SERVICE IMPROVEMENTS</b>	
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<b>INTERNET AND SOCIAL MEDIA</b>	
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<b>Social Media Usage</b>	<b>2021</b>	<b>2022</b>
<b>Facebook</b>	60.0%	64.0%
<b>Twitter</b>	23.0%	23.0%
<b>Instagram</b>	34.0%	31.0%
<b>Snapchat</b>	15.0%	14.0%
<b>LinkedIn</b>	19.0%	31.0%
<b>Youtube</b>	43.0%	39.0%
<b>TikTok</b>	N/A	15.0%
<b>I do not use any of these</b>	41.0%	18.0%



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Do you feel MCTS does enough outreach to the community?	2021	2022
Yes	74.0%	74.0%
No	26.0%	26.0%

How would you like MCTS to reach out to the community?	2021	2022
Advertising	59.0%	59.0%
On-board bus information	57.0%	55.0%
Information posted at bus stops	58.0%	56.0%
Participate in community events	39.0%	41.0%
Host a public open house	24.0%	26.0%
Free webinar	10.0%	20.0%
Other	9.0%	7.0%

INFORMATION RESOURCES		
Used Real-Time Info	2021	2022
Every time I ride the bus	47.0%	44.0%
Sometimes	19.0%	22.0%
Rarely	14.0%	11.0%
I didn't know MCTS offered Real-Time Bus Tracking	21.0%	23.0%

Primary Access to Real-Time Info	2021	2022
MCTS Website	31.0%	45.0%
UMO app	42.0%	22.0%
The MCTS telephone info line	10.0%	13.0%
An independent app	14.0%	14.0%
Text messages	3.0%	6.0%

MCTS INFORMATION ACCESS		
Access to MCTS Information	2021	2022
MCTS Website	41.0%	50.0%
UMO app	27.0%	14.0%
MCTS Social Media	3.0%	5.0%
MCTS Printed Schedules	5.0%	6.0%
Rider Insider	3.0%	3.0%



## Milwaukee County Transit System

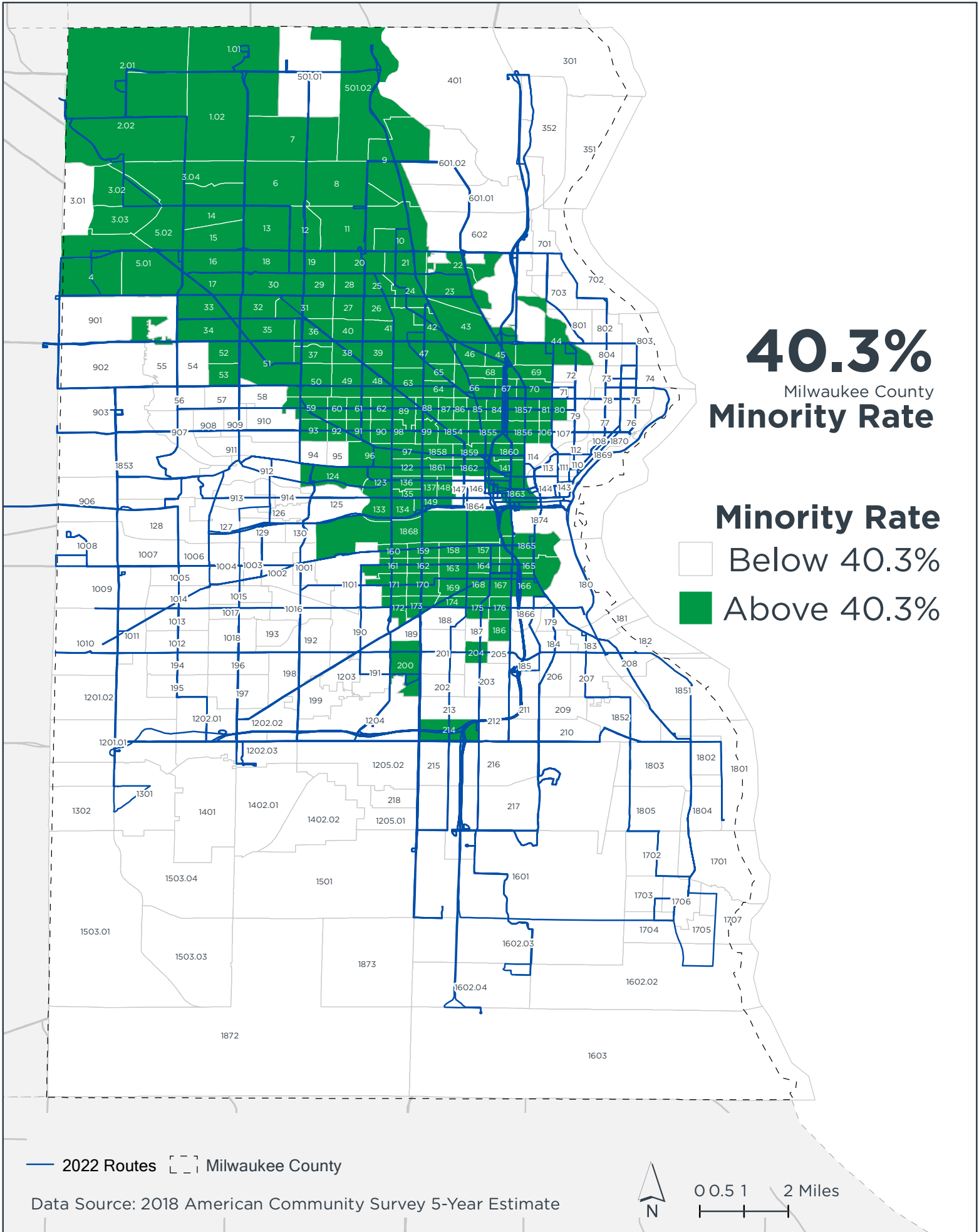
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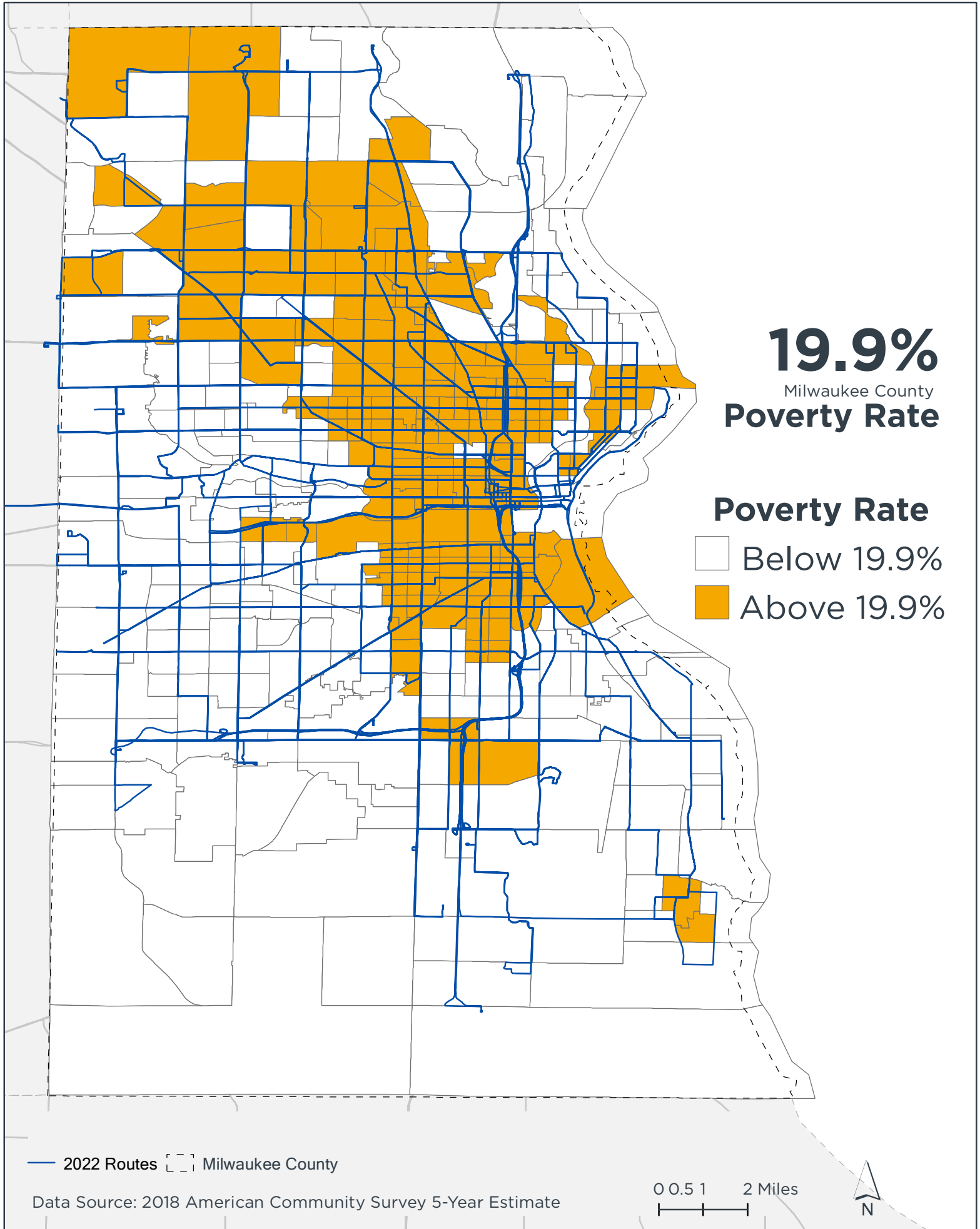
<b>Local News</b>	6.0%	6.0%
<b>Audio info on the buses</b>	1.0%	1.0%
<b>Bus Lines</b>	N/A	3.0%
<b>Signs at Bus Stops</b>	8.0%	7.0%
<b>Other</b>	5.0%	5.0%

<b>Visited MCTS Website in the Last Month</b>	<b>2021</b>	<b>2022</b>
<b>Yes</b>	39.0%	46.0%
<b>No</b>	58.0%	48.0%
<b>Don't Know</b>	4.0%	6.0%

# High Minority Populations by Census Tract ID



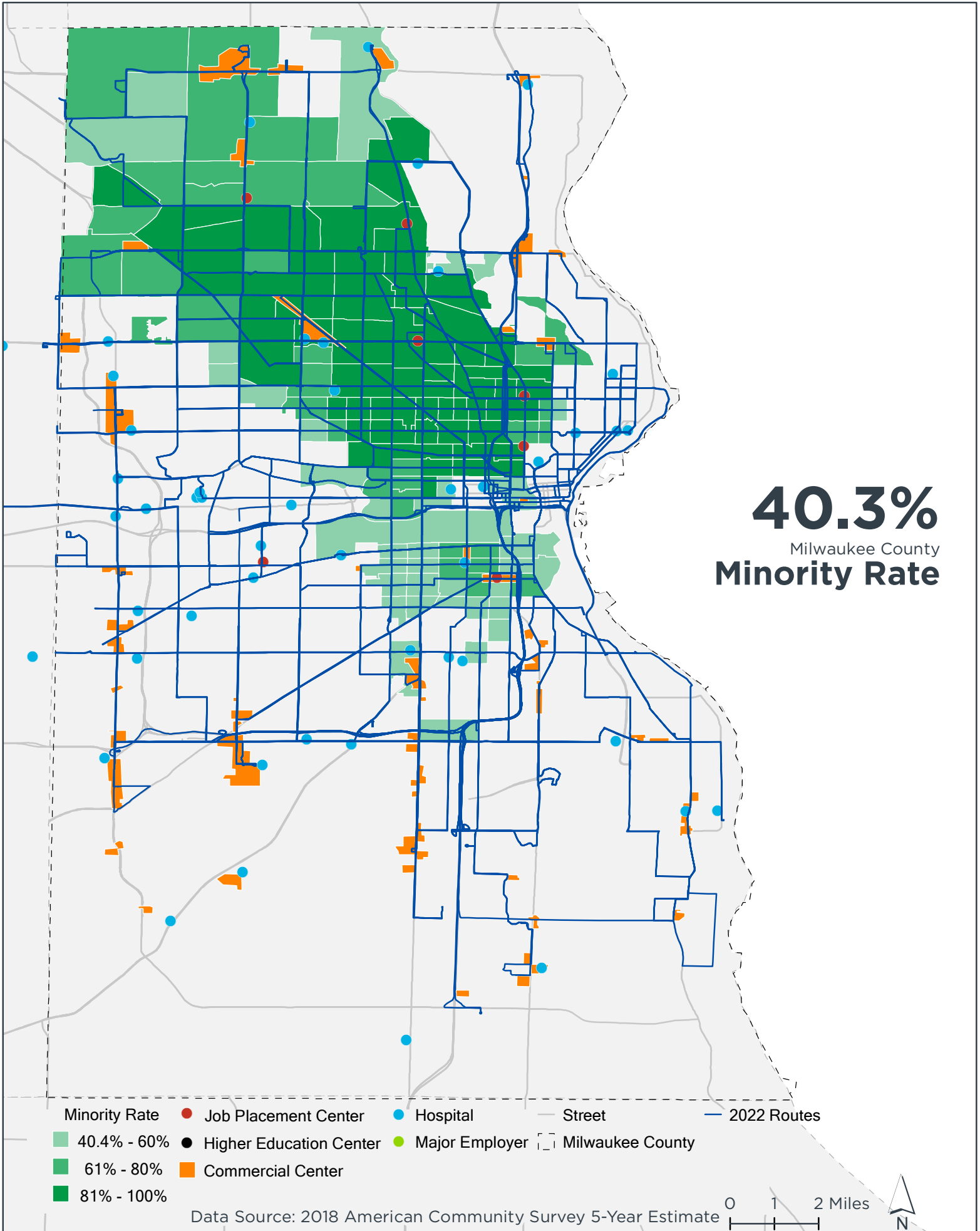
# High Low-Income Populations by Census Tract ID A-101





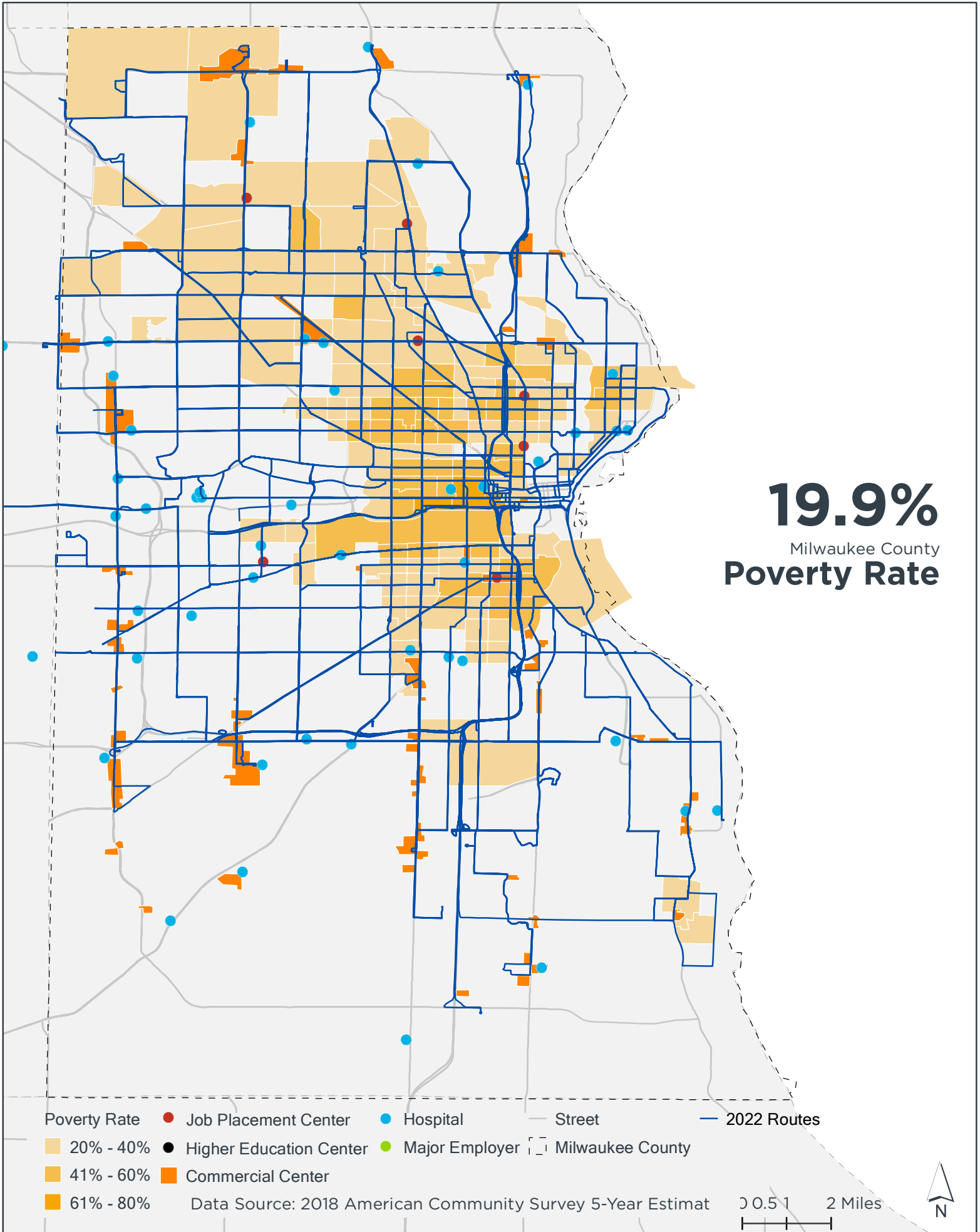
# High Minority Populations & Milwaukee County Transit Hubs

A-102

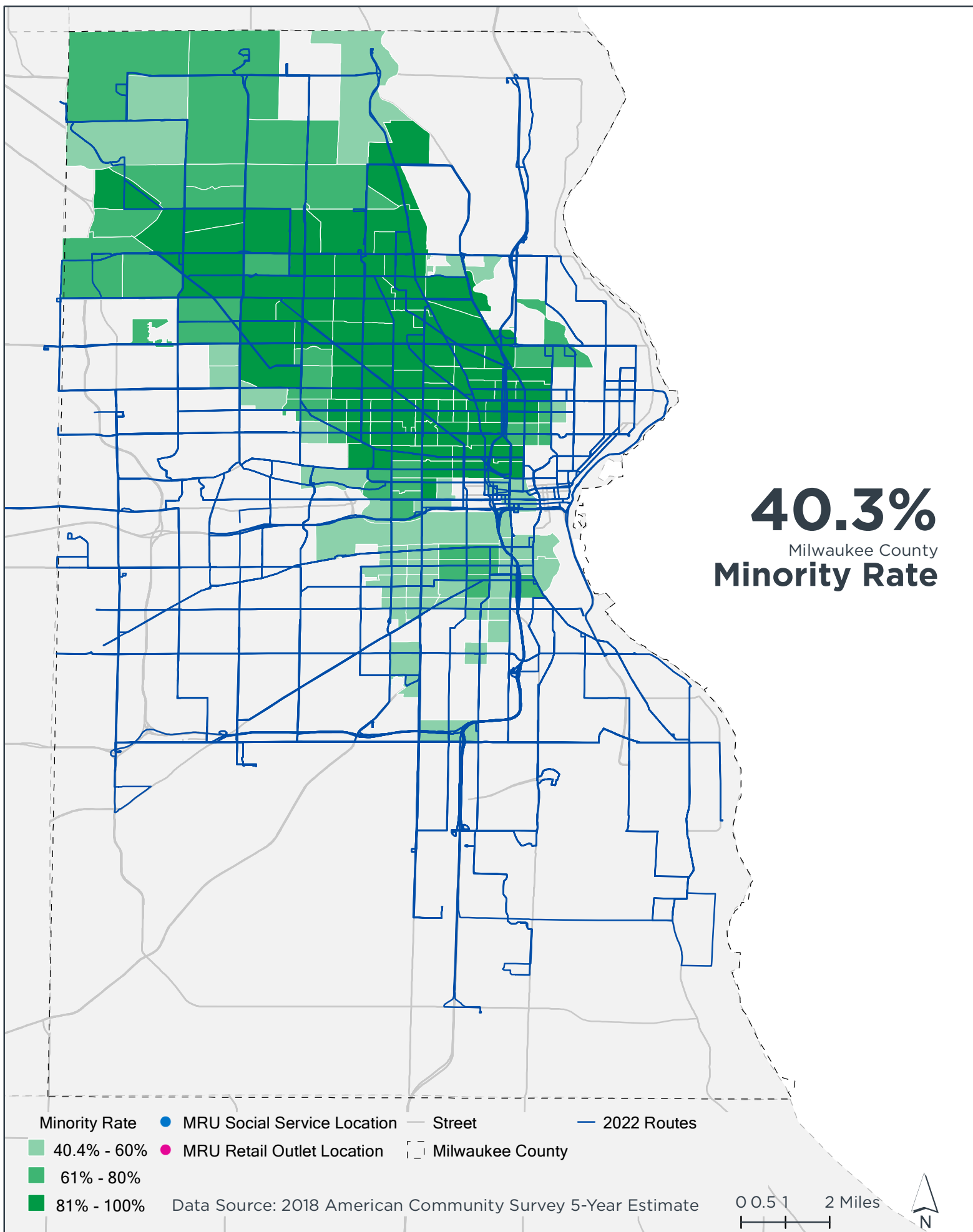


# High Low-Income Populations & Milwaukee County Transit Hubs

A 108

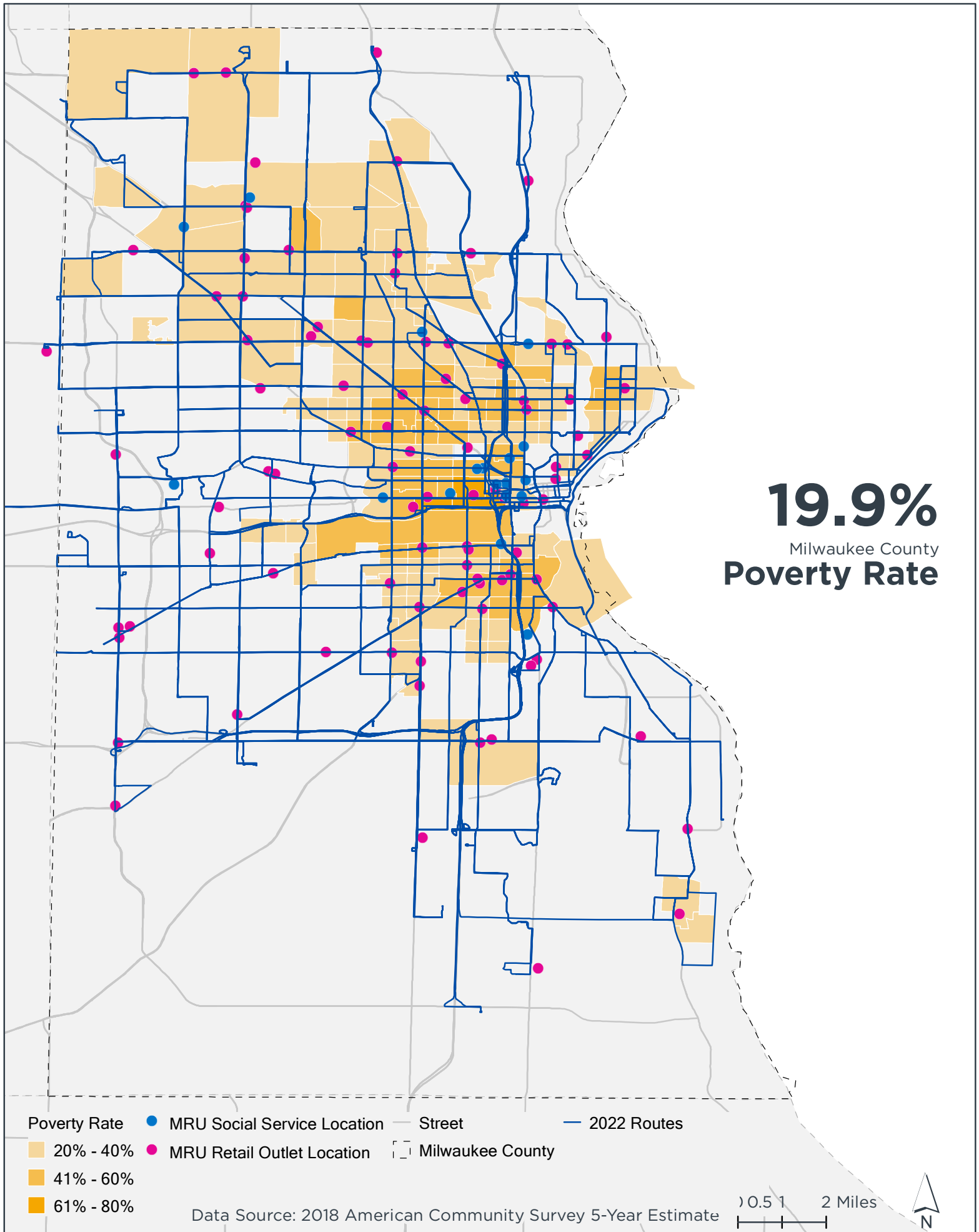


# High Minority Populations & M-Card Recharging Unit (MRU) Locations



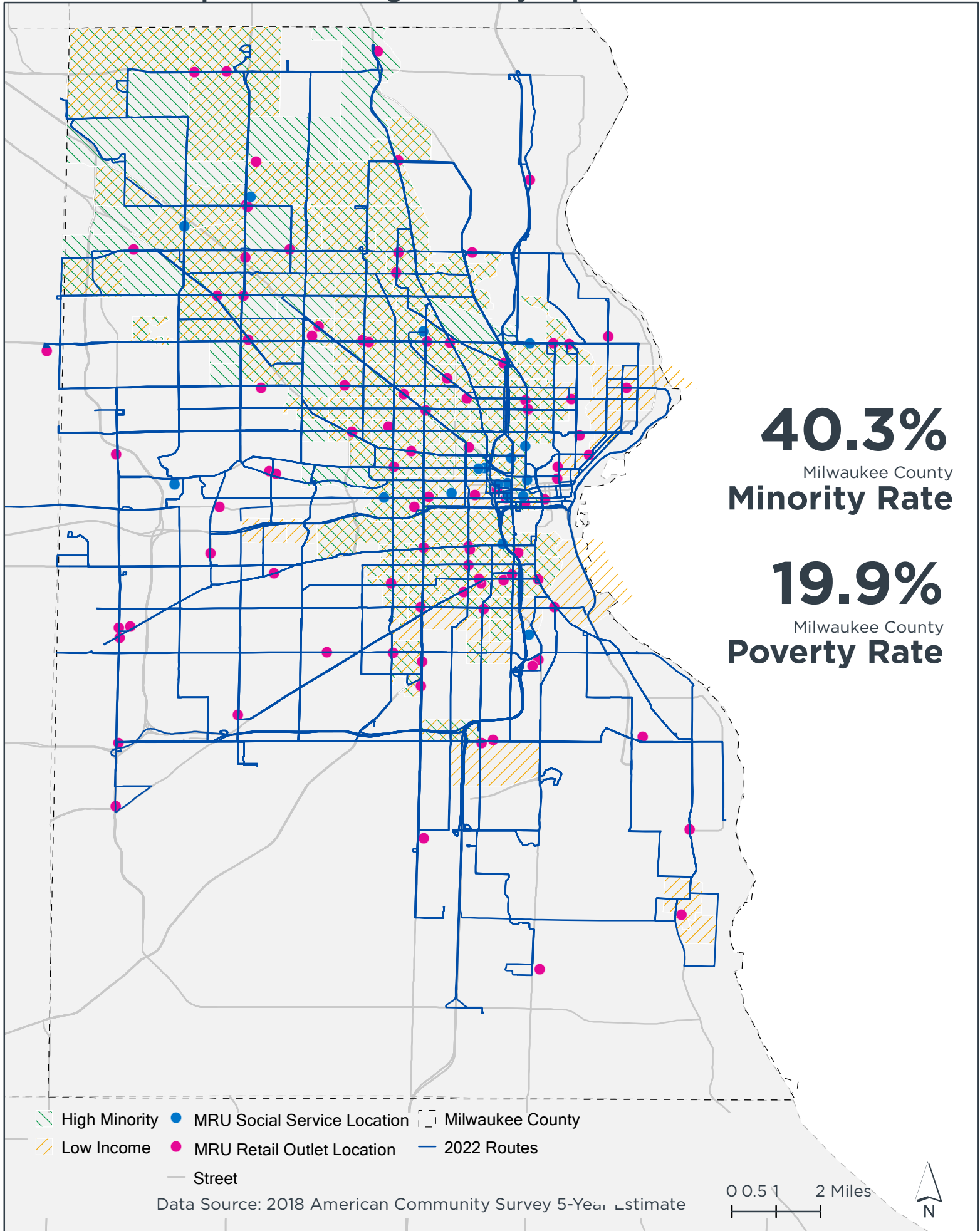
# High Low-Income Populations & M-Card Recharging Unit (MRU) Locations

A-105



# M-Card Recharging Unit (MRU) Locations & a Comparison of High Low-Income Populations to High Minority Populations

A-106



**Milwaukee County Transit System  
Interoffice Memorandum**

TO: Tom Winter, Director of Service Development

FROM: Jesus Ochoa, Planning Manager

SUBJECT: Title VI Fare Equity Analysis - New Fare Collection System

DATE: December 3rd, 2022

The Federal Transit Administration (FTA) requires transit providers conduct an analysis of any change in fares to determine whether these changes will have a disparate impact on Title VI protected groups, i.e., minority and low-income populations. MCTS is in the process of replacing and upgrading its existing fare collection system with an account-based system, powered by UMO and will be coined WisGO, utilizing smart phone and smart cards that is designed to machine-validate all fares. The new system is expected to be operational in the last quarter of 2023. Referred to as a “fare equity analysis”, this information must be included in Milwaukee County’s overall Title VI program that is submitted to the FTA.

#### **Background on New Fare Collection System**

The primary features of the new fare collection system will be the introduction of validators on buses and account-based payment systems. The vision of the new fare collection system is centered around three principles: simplicity, equity, and growth. The new system will create a tariff that is simpler and eliminates complex rules and exceptions that exist today, with minimal driver interaction. In terms of equity, the new system will be more accessible by providing more payment options and more retail locations to load funds than in today’s fare collection system. In addition to more retail location and payment options, the new system will introduce equal pricing for all users through a new feature: fare capping, which prevents a low-income customer, who may not have sufficient funds to purchase a weekly or monthly pass upfront, from being “penalized” by overpaying over the course of that time (see definitions below). Finally, the new system utilizes the UMO account-based platform, which is a scalable, regional platform that encourages more ridership by providing ease of access to other transit agencies and micro mobility companies that are under the same platform through your UMO user-account. This system will allow the replacement of M-Card payments on the farebox with WisGo cards/mobile device payments that will be validated on the new validator digital scanners. However, MCTS will continue to collect cash fares on existing fareboxes, but free transfers will be eliminated with cash purchases under the new fare collection system. Details about fare forms and the distribution of fare forms are as follows:

**Pre-paid Stored Value UMO Account**– Stored value results from loading dollars onto a passenger’s UMO account online or at one of the 200+ retail locations using cash or credit/debit cards. A passenger then chooses to pay with a smart card (WisGo Card) or mobile device, loaded with dollar value, and will see their stored value amount reduced with each fare that is paid. Using pre-paid stored value dollars from a smart card / mobile device also includes a free transfer speeding up the boarding process and limiting interaction with the bus operator to shift cash users to the account-based system where they can benefit from the fare capping opportunities as well.

**Rolling Period Passes / Fare Capping** – 1-day, 7-day and 31 day passes, will be replaced by fare caps on weekly and monthly basis using ones UMO Account. With the introduction of fare capping, weekly and monthly passes will be directly applied to user’s accounts upon reaching the cap monetary limit for a day, week, or month respectively. All rides after the cap (\$) have been met will be free for the remainder of that period resulting in money saved on a daily/weekly/monthly basis for all users of the transit system, not just those that can afford to spend more upfront. Below is a table detailing the cap limits by day/week/month.

	Daily	Weekly	Monthly
Full Fare	\$4.00	\$19.50	\$72.00
Reduced Fare	\$2.00	\$11.00	\$32.00

**(Transfers)** – Transfers will be available to passengers with WisGo cards /mobile devices as soon as they are used as fare forms on the bus. Cash users will not receive free transfers upon paying on buses, however, a passenger can elect to purchase single ride tickets from the ticket vending machines along the CONNECT 1 BRT route that will include a free transfer. “Lite” passes will also be available to social service agencies in the area who have historically provided that service and support to their members, which are single ride tickets that include a transfer. As mentioned earlier, the new fare collection system provides cost saving benefits to users, especially low-income users, and aims at shifting away from cash.

**Special Fare Forms** – Student / UPASS and Commuter Value Passes will still be available and unchanged in the new UMO fare collection system. The New Freedom and GO PASS programs will also continue but be grouped under Reduced Fare in order to simplify fare forms (See Table 2 for more details).

**Smart Card Fare Forms Distribution** – The distribution network under which WisGo smart cards will be available is being expanded to more ready-fare retail outlets to also includes the UMO Web Portal, as described below:

- UMO Web Portal: The UWP will allow passengers with access to the internet and possession of a credit card to load funds on-line to their UMO account. Users have the option of using their mobile device or using a WisGO card. Passengers can also add value to the WisGO card or mobile device through area retail establishments in two ways:
  - Retail stores participating in the Incomm network allow the riders to load value at most cash registers existing in many stores.
  - Retail establishments which are not part of the Incomm network can also participate as a reloading station through a web-based portal generally setup at the Customer Service counter.
  - MCTS-Owned Buildings will sell new cards and load stored value.

- Farebox: Single rides can be paid by cash on fareboxes. UMO accounts cannot be loaded with funds on bus fareboxes.

### Description of Fare Equity Analysis and Definitions

The basic steps in the fare equity analysis are as follows:

- Develop a disparate impact policy and a disproportionate burden policy with input from the public. MCTS currently has a fare equity policy in place in its Title VI program
- Examine fare use patterns for both minority riders and low-income riders (the percent of riders for each fare type)
- Review the current and proposed change in fares
- Assess the impacts of the proposed change in fares
- Determine if there is a finding of a disparate impact or disproportionate burden
- If necessary, examine alternatives or modify the proposal to mitigate the impact or burden

A disparate impact is “neutral policy or practice that disproportionately affects members of a protected class identified by race, color, or national origin.” It exists where a transit provider’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 effect on the basis of race, color, or national origin. A disproportionate burden refers to “a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.”

### Disparate Impact Policy and Disproportionate Burden Policy

MCTS uses the four-fifths rule as the threshold for measuring whether minority riders are bearing a disparate impact of adverse effects of a fare change or whether low-income riders are bearing a disproportionate burden of such a fare change. The four-fifth’s rule is a method of calculating how much one group is impacted compared to another group. Specifically, a disparate impact has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the minority group compared to the non-minority group is below four-fifths (0.80) or 80%. Similarly, a disproportionate burden has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the low income group compared to the non-low-income group is below four-fifths.

### Fare Use Patterns by Passenger Group

MCTS obtained fare use data collected by the Southeastern Wisconsin Regional Planning Commission (SEWRPC). They distributed an extensive on-bus travel survey to MCTS passengers in October and November 2012. The survey was conducted on all regular and freeway flyer service. Passengers were specifically asked how they paid for their trip. The results of the survey are shown in Table 1.



**Table 1.**  
**Fare Usage on MCTS Fixed Route Service by Group.**

	<b>% Minority</b>	<b>% Non – Minority</b>	<b>% Low Income</b>	<b>% Non –Low Income</b>	<b>% of Total</b>
<b>In Total</b>	70	30	43	57	99
<b>Weekly Pass Passengers</b>	28.0	15.8	26.0	23.2	24.5
<b>UPASS/MPS</b>	17.1	28.9	23.5	18.3	20.4
<b>Cash Passengers</b>	18.4	14.0	16.2	17.9	17.2
<b>Monthly Pass Passengers</b>	6.5	11.5	6.8	8.9	8.0
<b>CVP Passengers</b>	1.6	4.6	1.4	3.5	2.6
<b>Half Cash Passengers</b>	1.7	2	1.8	1.7	1.8
<b>Transfer-Passengers</b>	1.4	1.6	1.5	1.3	1.5
<b>Non-response/Free</b>	1.9	1.2	1.1	1.5	1.0
<b>New Freedom Pass</b>	0.2	0.4	0.3	0.1	0.3

Note: Data obtained from SEWRPC 2012 on bus passenger survey. Low-income status was determined by SEWRPC using 2012 U.S. Department of Health and Human Services Poverty Guidelines.

### **Review of Current and Proposed Fare Changes with the New Fare Collection System**

MCTS will begin the implementation of the new UMO fare collection system in the first quarter of 2023 (assuming the new project progresses into installation through operability testing and passes final acceptance testing). The most important aspect of this transition is that fares will be simplified and more equitable through the introduction of fare capping and refined fare types with no changes to paratransit fares (Table 2).

**Table 2.**  
**2023 MCTS New Fare Collection System – Current and Proposed Fare Types**

<b>Proposed Fare Name</b>	<b>Current Fare</b>	<b>Proposed Fare</b>	<b>Change in Fare? / Comments</b>
<b>Cash Fares</b>			
Adult	2.25	\$2.25	No Change in Fare, no transfer
Premium	3.25	-	Elimination of fare type
Concession (Half-Fare)	1.10	\$1.00	Reduction in fare, no transfer
Concession Premium Fare	\$1.60	-	Elimination of fare type
<b>WisGo Card &amp; Mobile App</b>			
Adult Single Ride	\$2.00	\$2.00	Elimination of M-CARD fare type. Replaced by UMO account fare type. Transfer included.
Premium Single Ride	\$2.50	-	Elimination of fare type.
Concession (Half-Fare)	\$1.10	\$1.00	Elimination of M-CARD fare type. Replaced by UMO account fare type. Transfer included.
Concession Premium Fare	\$1.60	-	Elimination of fare type.
Daily Fare Cap	New Product	\$4.00	In a given Day, all Adult Single Rides totaling up to \$4.00 = Free Rides for the rest of the week.
Weekly Fare Cap	New Product	\$19.50	In a given week, all Adult Single Rides totaling up to \$19.50 = Free Rides for the rest of the week.
Monthly Fare Cap	New Product	\$72.00	In a given month, all Adult Single Rides totaling up to \$72.00 = Free Rides for the rest of the month.
Reduced Daily Fare Cap	New Product	\$2.00	In a given Day, all Adult/Premium Single Rides totaling up to \$2.00 = Free Rides for the rest of the week.
Reduced Weekly Fare Cap	New Product	\$11.00	In a given week, all Adult/Premium Single Rides totaling up to \$11.00 = Free Rides for the rest of the week.
Reduced Monthly Fare Cap	New Product	\$32.00	In a given month, all Adult/Premium Single Rides totaling up to \$32.00 = Free Rides for the rest of the month.
<b>Pass Fares</b>			
1-Day Adult Pass	\$4.00	-	Elimination of fare type.
1-Day Adult Pass	\$5.00	-	Elimination of fare type.
1-Day Premium Pass	\$6.00	-	Elimination of fare type.
1-Day Concession Pass	\$2.00	-	Elimination of fare type.
1-Day Concession Pass	\$3.00	-	Elimination of fare type.
3-Day Adult Pass	\$3.00	-	Elimination of fare type.

3-Day Premium Pass	\$18.00	-	Elimination of fare type.
3-Day Concession Pass	\$6.00	-	Elimination of fare type.
3-Day Concession Prem. Pass	\$9.00	-	Elimination of fare type.
7-Day Adult Pass	\$19.50	-	Elimination of fare type. Weekly Cap Replacement.
7-Day Premium Pass	\$24.00	-	Elimination of fare type.
7-Day Concession Pass	\$11.00	-	Elimination of fare type.
31-Day Adult Pass	\$72.00	-	Elimination of fare type. Monthly Cap Replacement.
31-Day Premium Pass	\$85.00	-	Elimination of fare type.
31-Day Concession Pass	\$32.00	-	Elimination of fare type.
<b>Other Special Fares</b>	<b>Current Fare</b>	<b>Proposed Fare</b>	<b>Change in Fare? / Comments</b>
Student 5-Day Pass	\$17.50	\$17.50	No change in fare. Valid weekdays, available to schools only
UPASS Semester Pass	\$50.00	\$50.00	No change in fare (value per semester)
Commuter Value Pass (quarterly)	\$220.00	\$220.00	No change in fare (value per quarter)
New Freedom Pass	\$2.00/Day	\$1.00/Ride	New Freedom will be grouped under Reduced Fare and with a daily cap or \$2
Transfer – encoded on rider’s Umo Card / App	Free	Free	Free using WisGO card or WisGo App. No transfer when paying cash.
M-Card Lite: One Ride/Two Ride	\$2.25/\$4.25	\$2.00	Decrease in fare. One-ride ticket only - Elimination of two-way ticket. Includes Transfer. Selling to general public at MCTS locations as an option to cash without transfer.
Mobile App Day Pass	\$5.00	-	Elimination of fare type.
Mobile App Single Ride (90 minutes)	\$2.00	\$2.00	Mobile app- same as WisGo card rates
Paratransit Fare	\$4.00	\$4.00	No change in fare. (per one way trip)
GO Pass	\$2.00/Day	\$1.00/Ride	GO Pass will be grouped under Reduced Fare and with a daily cap or \$2

### Assessment of the Impact / Process Used to Analyze New Fare Forms

The proposed changes that would occur with the transition to new fare forms have to do with the mechanisms that some fares are made available. As was noted earlier, pass fare types (adult 1-day, 3-day, 7-day, 31-day and their premium counterparts) would no longer be available as the account-based UMO system would digitally apply these passes through fare capping. A transitional change would occur for passengers that use student passes, UPASS, Commuter Value Pass, and the New Freedom pass. Passengers would be transitioned to an UMO account card (WisGo Card) or mobile option, with no change to their fare. Finally, transfers will continue to be encoded onto a passenger’s WisGo card or mobile device, however cash purchases on buses will not include a transfer. Passengers that pay with cash

are currently eligible for a transfer that is issued by the bus operator to their M-Card. The transfer allows the passenger to ride free on another bus within a 60-minute timeframe. The new fare collection system will move MCTS towards machine validation of all fare forms, which means the discontinuation of manual transfer entries by bus operators. As the elimination of cash transfers would require passengers who pay with cash pay per ride (depending on the number of transfers needed), staff completed an analysis of the impact this would have on minority and low-income passengers.

MCTS used the following process to analyze the impact of an increase in fares and to determine if a disparate impact exists as a result:

1. Determine the percent usage for both minority and non-minority passengers for each fare type.
2. Compare the percent usage for both the minority group and the non-minority group to see which has the higher use for each fare type:
  - a. If the percent usage by minority passengers is higher than for non-minority passengers, an impact ratio is calculated that is equal to the percent use by non-minority passengers divided by the percent use of minority passengers.
    - i. If the ratio is less than 0.80, the 4/5ths rule threshold has been crossed and a disparate impact exists. If the ratio is greater than 0.80, a disparate impact does not exist.
  - b. If the percent usage by minority passengers is lower than for non-minority passengers, the impact ratio is scored as 100%, i.e., the impact of the fare increase will be greater on non-minority passengers than on minority passengers.

The same process would be followed to determine if a disproportionate burden existed for persons with low incomes.

### **Analysis of the Impact of Eliminating Cash Transfers**

The percent of minority passengers that pay with cash (18.4%) exceeds that for non-minority passengers (14.0%) (Table 1). The impact ratio would be 0.76 (14.0 / 18.4) and a disparate impact would technically exist as it is below 0.80. Mitigation would be needed.

As regards income levels, the percent of low-income passengers that pay with cash (16.2%) is less than that for non-low-income passengers (17.9%) (Table 1). The impact ratio would be 0.94 (16.2 / 17.9). In this case, the impact ratio is 100% and a disproportionate burden does not exist.

### **Requirement to Mitigate Disparate Impacts / Disproportionate Burdens**

FTA requires transit systems that determine a finding of a disparate impact or a disproportionate burden must take actions to minimize or mitigate the impact. As was noted, MCTS identified that a disparate impact would occur for minority passengers who pay with cash and use a transfer under the proposed new fare collection system. Although, it was determined that there was not a disproportionate impact on low-income passengers, MCTS will take the following actions to minimize or mitigate this impact on both minority and low-income populations:

- The UMO account-based system will allow passengers to load funds to their account whether they use a WisGo Card or their mobile device. Upon using their card or mobile device a transfer will be allotted to the user. MCTS will educate the public before the transition to the new UMO system prior to transition and distribute WisGO smart cards for free for a limited period of time throughout the community through the end of June 2023. Moreover, M-Card stored value will be honored as passengers transition to the WisGO Card/mobile device for a limited time until August 2023.
- After the initial ‘free card’ period, WisGO cards will be available for \$2.00. Since the UMO system is account based, WisGO cards are reusable for a period of many years, the cost is not considered prohibitive.
- MCTS will oversee an extensive effort to educate the passengers and the public of the cost benefits of using WisGO cards / mobile devices versus using cash including savings from introducing fare capping to the system in March 2023 through August 2023 and beyond as the transition between fare collection systems progresses.

### **Additional Analysis of the New Fare Collection System – Change in Access to Retail Outlets**

MCTS also analyzed the impact of adding more retail outlets where passes are sold to see if there would be a disparate impact or disproportionate burden on minority or low-income passengers between current and proposed locations. While geographic access to outlets is not specifically mentioned in the FTA Title VI Circular 4702.1B, it was felt this issue should be analyzed as it fits in with the intent of the guidance.

MCTS’ current network of outlets includes approximately 88 locations. These sites include grocery stores, banks, pharmacies, universities, and municipal offices. The transition to the new fare collection system is proposed to increase the number of outlet locations to approximately 212 by adding 124 new outlets to the existing network. The criteria used to increase the retail outlet network included the following items:

- Maintain outlet locations in areas of high residential density and high bus ridership
- Maintain outlet locations adjacent to other retail outlets
- Maintain outlets with high volume sales
- Outlets must have internet access (a requirement of SMARDS)
- Outlets must have the capability to process credit cards

A GIS analysis indicated that 30% of all new outlets (37 of 124) are in minority census tracts and 70% are in non-minority tracts (93 of 124). The impact ratio would thus be 0.43 (30% / 70%) and a disparate impact would exist as it is below 0.80. Similarly, 41% of all new outlets are in low-income tracts (51 of 124) and 59% are in non-low-income tracts (59 of 124). The impact ratio would be 0.69 (41% / 59%) and a disproportionate burden would exist as it is below 0.80. This means that the added new retail locations under the new fare collection system do disproportionately burden minority or low-income populations respectively.

### Requirement to Mitigate Disparate Impacts / Disproportionate Burdens

As was noted earlier, the FTA requires transit systems that determine a finding of a disparate impact or a disproportionate burden take actions to minimize or mitigate the impact. Consequently, MCTS will take the following actions to minimize or mitigate the impacts / burdens described earlier with regard to cash users. Although no disparate impacts were found with the new retail locations:

- MCTS will look to retain as many current retail locations as possible, specifically those that are located in minority and low-income census tracts.
- MCTS Planning and Finance Departments will partner with future retail locations within minority and/or low-income census tracts to ensure that MCTS meets the needs of each population group respectively..
- Offer a transitional period between fare collection systems to educate riders on the benefits of the account-based system and fare capping by targeting areas where cash use is prominent.

### Summary of SAFES between 2021-2023

<b>2021 SAFES</b>		
<b>Route</b>	<b>Type of Service</b>	<b>Description of Change under MCTS NEXT Recommended System</b>
<b>40</b>	Flyer	COVID-19 Suspension of Service
<b>43</b>	Flyer	COVID-19 Suspension of Service
<b>44</b>	Flyer	COVID-19 Suspension of Service
<b>46</b>	Flyer	COVID-19 Suspension of Service
<b>48</b>	Flyer	COVID-19 Suspension of Service
<b>49</b>	Flyer	COVID-19 Suspension of Service
<b>137</b>	Flyer	COVID-19 Suspension of Service

<b>2022 SAFES</b>		
<b>Route</b>	<b>Type of Service</b>	<b>Description of Change under Under 2022 Budget</b>
<b>18</b>	Fixed	New service to Beyond Vision. Branch removed/replaced.
<b>40</b>	Fixed	Eliminated in 2023 Budget.
<b>43</b>	Flyer	Eliminated in 2023 Budget.
<b>44</b>	Flyer	Eliminated in 2023 Budget.
<b>46</b>	Flyer	Eliminated in 2023 Budget.
<b>48</b>	Flyer	Eliminated in 2023 Budget.
<b>49</b>	Flyer	Eliminated in 2023 Budget.
<b>54</b>	Fixed	Service will be extended along National Avenue to 112th
<b>60</b>	Fixed	Service will terminate at Layton Avenue
<b>137</b>	Flyer	Eliminated in 2023 Budget.

<b>2023 SAFES</b>		
<b>Route</b>	<b>Type of Service</b>	<b>Description of Change under Under 2022 Budget</b>
<b>CONNECT 1</b>	Fixed	New BRT Route
<b>GoldLine</b>	Fixed	Retired with start of CONNECT 1
<b>14</b>	Fixed	Split into two routes.
<b>52</b>	Fixed	Reconfigured Segment. New Service extension

**Milwaukee County Transit System  
Interoffice Memorandum**

TO: File

FROM: Jeff Sponcia, Planning Manager

SUBJECT: SAFE Analysis – Suspension of Flyer Routes Longer Than 12 Months During COVID-19

DATE: April 30<sup>th</sup>, 2021

With the onset of the COVID-19 pandemic in March 2020, MCTS suspended service on its entire group of Freeway Flyer routes starting on Monday, March 23<sup>rd</sup>, 2020. This suspension of service applied to the following routes and is still ongoing (see Map 1):

- 1) Route 40 (College Avenue Flyer)
- 2) Route 43 (Hales Corners Flyer)
- 3) Route 44 (State Fair Park Flyer)
- 4) Route 46 (Loomis Flyer)
- 5) Route 48 (South Shore Flyer)
- 6) Route 49 (Brown Deer-Bayshore Flyer)

Per FTA rules, MCTS is required to prepare a Service and Fare Equity (SAFE) analysis during COVID-19 if a transit agency makes a change that lasts longer than 12 months (service) or 6 months (fare). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize or mitigate the impacts where practicable.

**BACKGROUND**

MCTS is the largest transit provider in the state of Wisconsin, providing nearly 29 million annual rides and approximately 1.3 million annual hours of service. MCTS' Freeway Flyer routes provide peak-only express service between various Park & Ride lots throughout Milwaukee County to Downtown Milwaukee. This service provides a cost-effective alternative for workers who do not want to or cannot park in or drive to Downtown Milwaukee. Morning service span ranges from 5:30AM to 8:30AM while afternoon/evening service span ranges from 3:30PM to 6:30PM. Average weekday ridership on each Freeway Flyer route in Fall 2019 was as follows:

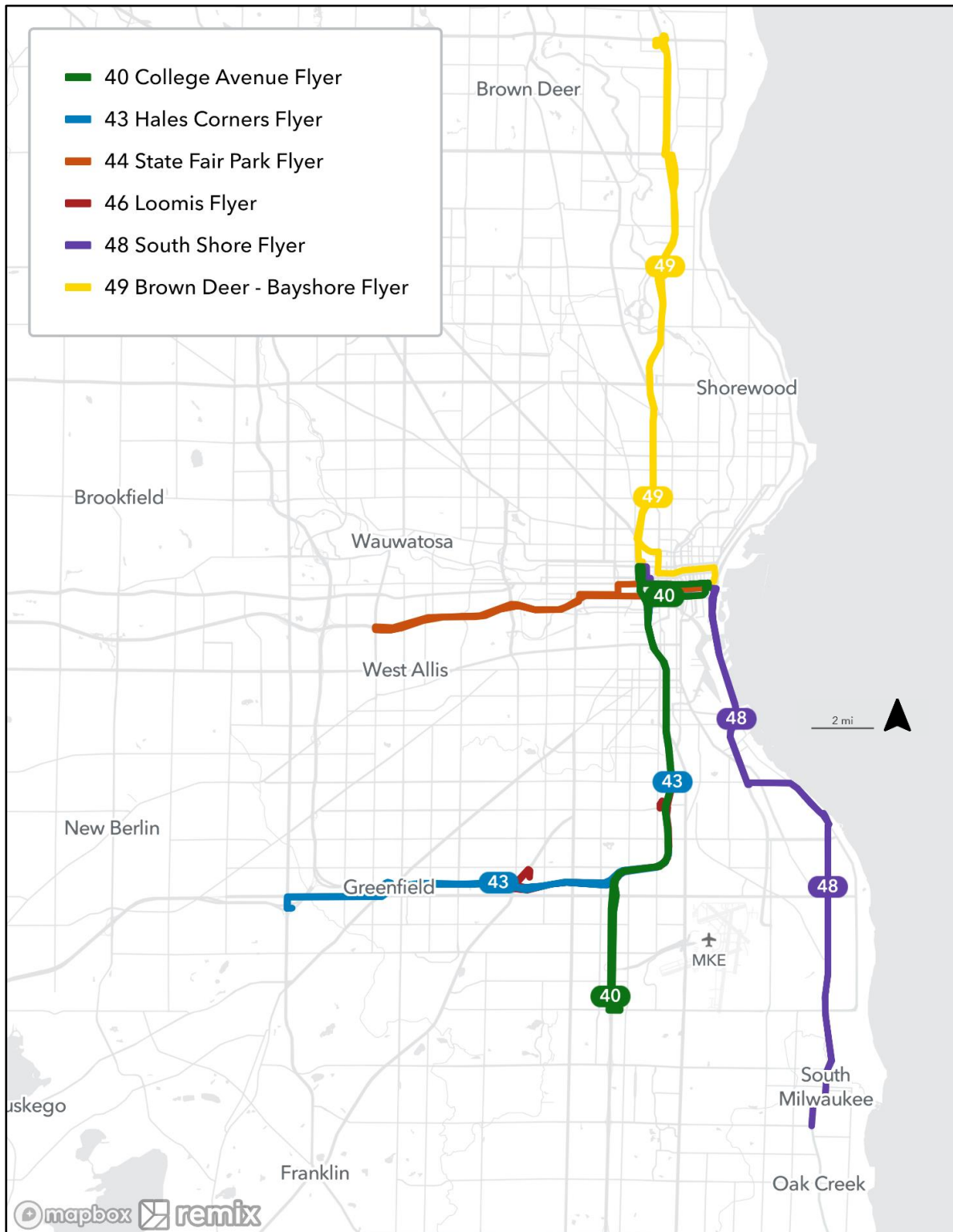
Route	Rides per Weekday	In-Service Hours per Weekday	Passengers per Bus Hour
<b>40</b>	173	15.5	11.2
<b>43</b>	172	13.1	13.2
<b>44</b>	95	10.1	9.4
<b>46</b>	103	12.6	8.2
<b>48</b>	160	11.3	14.2
<b>49</b>	152	16.9	9.0

In order to save funds throughout the pandemic to put towards operating more productive routes that serve thousands of riders each day, and due to nearly all major businesses in Downtown Milwaukee



closing to in-person employment since March 2020, MCTS suspended service on these routes until further notice. Their last day of service was Friday, March 20<sup>th</sup>, 2020.

Map 1.  
MCTS Freeway Flyer Route Network



## DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the 2010 Census, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of the MCTS Freeway Flyer Network revealed that the network of routes predominantly serves non-minority and non-low-income census tracts (Maps 2 and 3).

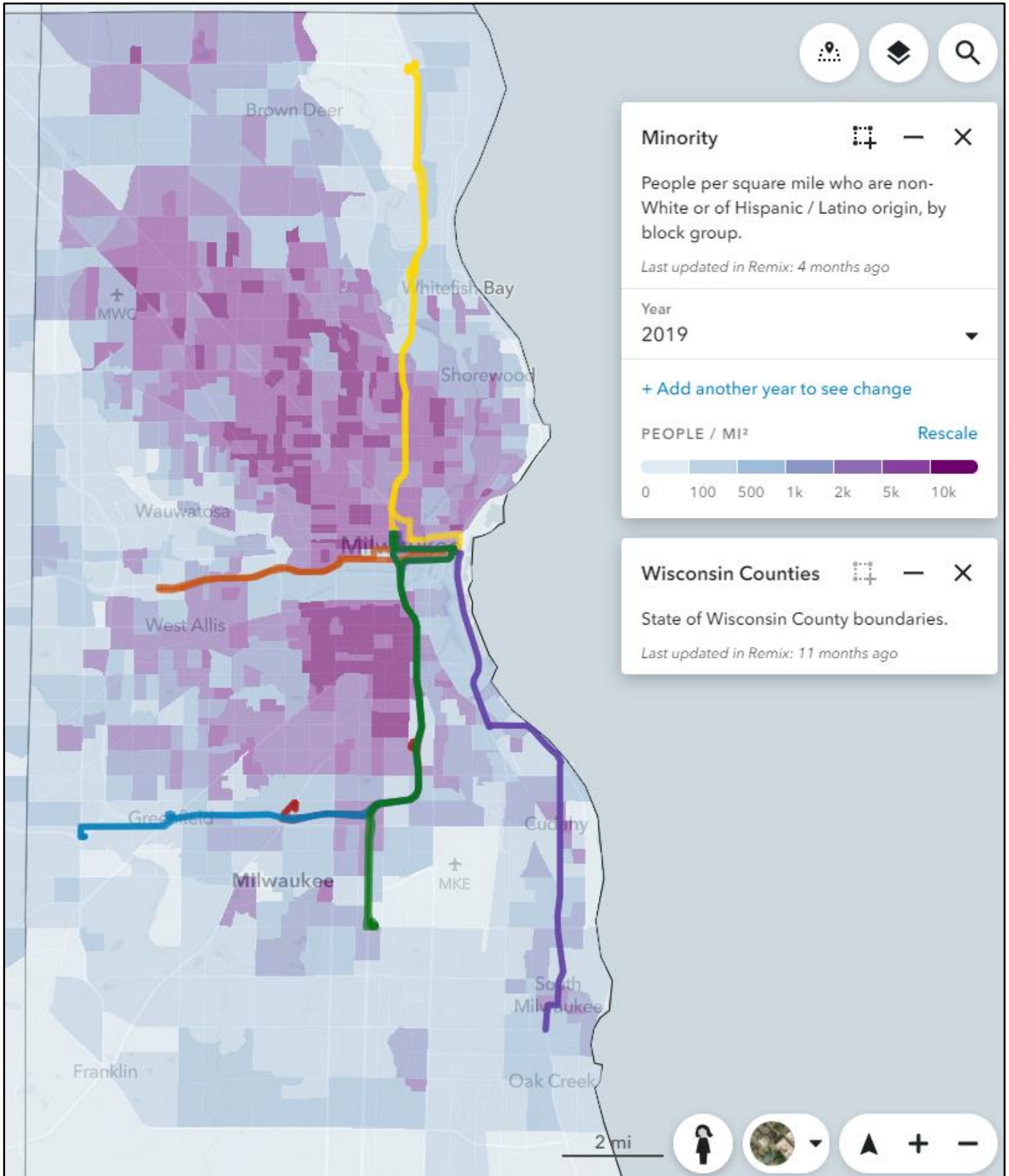
MCTS also analyzed how this change would affect minority and low-income peoples’ access to transit. While the elimination of any route will have a detrimental effect on everybody’s access to transit service, it was determined that the impact on minority and low-income communities was not disproportionate (Table 1). Per FTA Circular 4702.1B rules, if the percent change for minority tracts (-0.53%) is lower than for non-minority tracts (-0.72%), the impact ratio is scored as 100%, i.e., the impact of the service reduction will be greater on non-minority passengers than on minority passengers. Similarly, if the percent change for low-income tracts (-0.18%) is lower than for non-low-income tracts (-1.16%), the impact ratio is scored as 100%, i.e., the impact of the service reduction will be greater on non-low-income passengers than on low-income passengers. Therefore, no mitigation measures are required.

Table 1	Trips Before	Trips After	4/5ths Rule	Percent Change
Low Income	55,928,735	55,630,385	135.14% (100%)	-0.53%
Non-Low Income	45,136,290	44,810,910		-0.72%
Minority	56,029,025	55,925,495	625.11% (100%)	-0.18%
Non-Minority	45,036,000	44,515,800		-1.16%
Total	101,065,025	100,441,295		

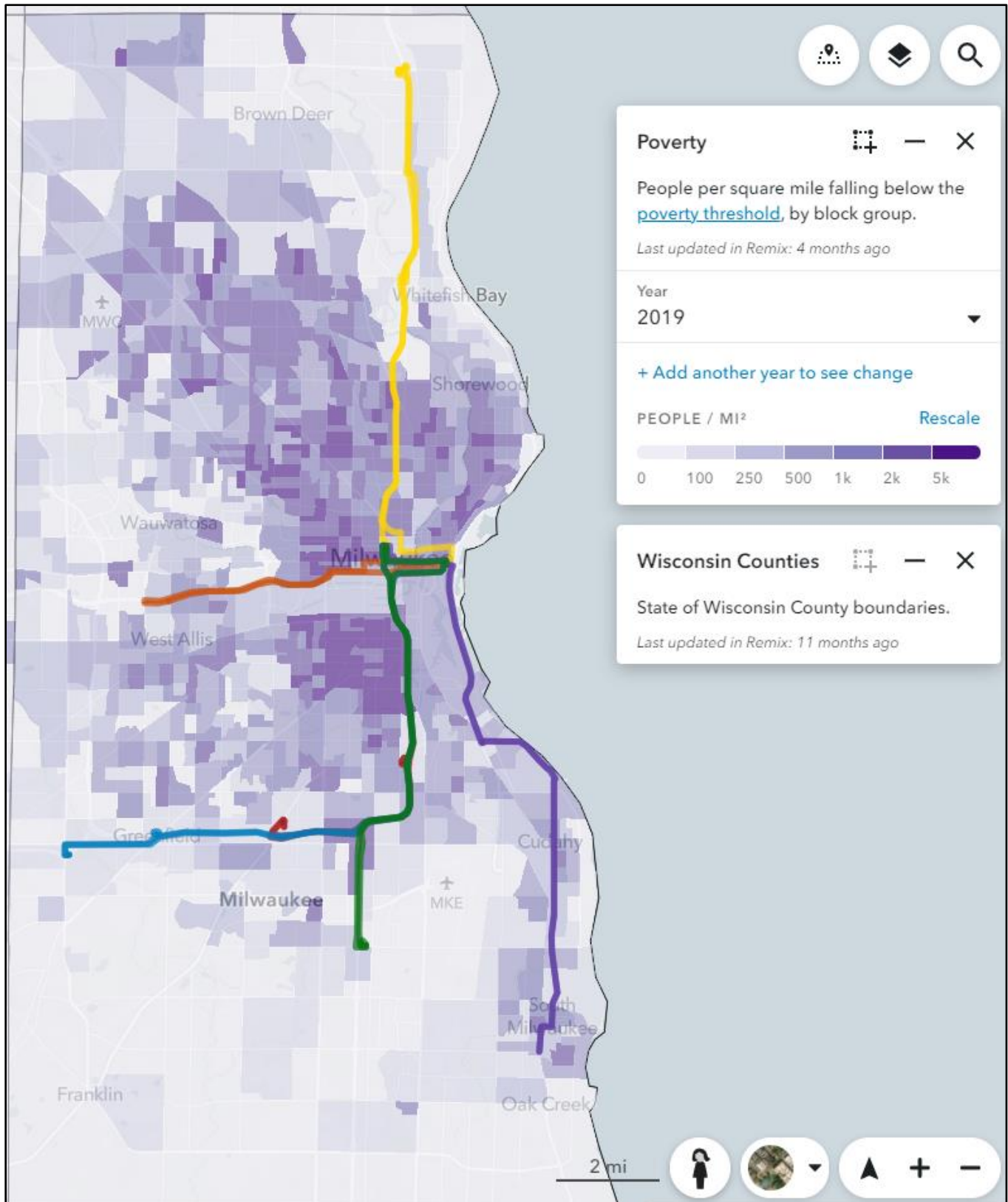
## SUMMARY

- MCTS suspended service on all six of its Freeway Flyer Routes starting in March 2020 due to the COVID-19 pandemic.
- Per FTA rules, because the suspension has lasted longer than 12 months, a SAFE analysis is required.
- The MCTS Freeway Flyer Route network is not composed of what are considered to be minority or low-income routes, and their suspension for longer than 12 months does not have a disparate impact on minority or disproportionate burden low-income communities.
- Furthermore, the percent reduction in service in minority and low-income census tracts is less than the percent reduction in service in non-minority and non-low-income census tracts, also proving their suspension for longer than 12 months does not have a disparate impact on minority or disproportionate burden low-income communities.

Map 2.  
Minority Population in Milwaukee County by Census Tract



Map 3.  
Low Income Population in Milwaukee County by Census Tract



**Milwaukee County Transit System  
Interoffice Memorandum**

TO: File

FROM: Jesus Ochoa, Senior Transit Planner

SUBJECT: SAFE Analysis – Elimination of Route 137 (House of Corrections)

DATE: August 2<sup>nd</sup>, 2021

The suspension of Route 137 (House of Corrections) meets the definition of a major service change and, per FTA rules, requires MCTS prepare a Service and Fare Equity analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must identify steps that can be taken to avoid, minimize or mitigate the impacts where practicable.

**BACKGROUND**

Route 137 (see Map 1) was created to serve the House of Corrections (HOC) in Franklin from Downtown Milwaukee. This route operates exclusively on Saturdays and stops along the busiest corridor in the system, Wisconsin Avenue in downtown Milwaukee, giving riders the chance to connect to this route at a transfer corner. This route operates using one bus between 8:30 AM and 1:00 PM totaling 4.7 bus hours per day.

Route 137 carried an average of 5 rides at a productivity level of 1 passenger per bus hour and is the lowest of any route in the MCTS system. After the start of the COVID-19 pandemic in March 2020, service on the route was suspended. At that time, the HOC introduced video technology to allow people to visit with members of their family. Route 137 continues to be suspended as of August 2021.

Given the minimal demand for transit service to the HOC and the option to use video technology to visit family members, MCTS recommends Route 137 be discontinued indefinitely.

Map 1.  
Route 137 Service Area



### **DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN**

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population. According to the 2010 Census, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of Route 137 revealed that it does not predominantly travel through minority and low-income census tracts (Maps 2 and 3). However, most routes that connect with Route 137 are characterized as being minority routes. As such, it was deduced the elimination of Route 137 would have a disparate impact on the minority population and a disproportionate burden on the low-income population.

### **MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS**

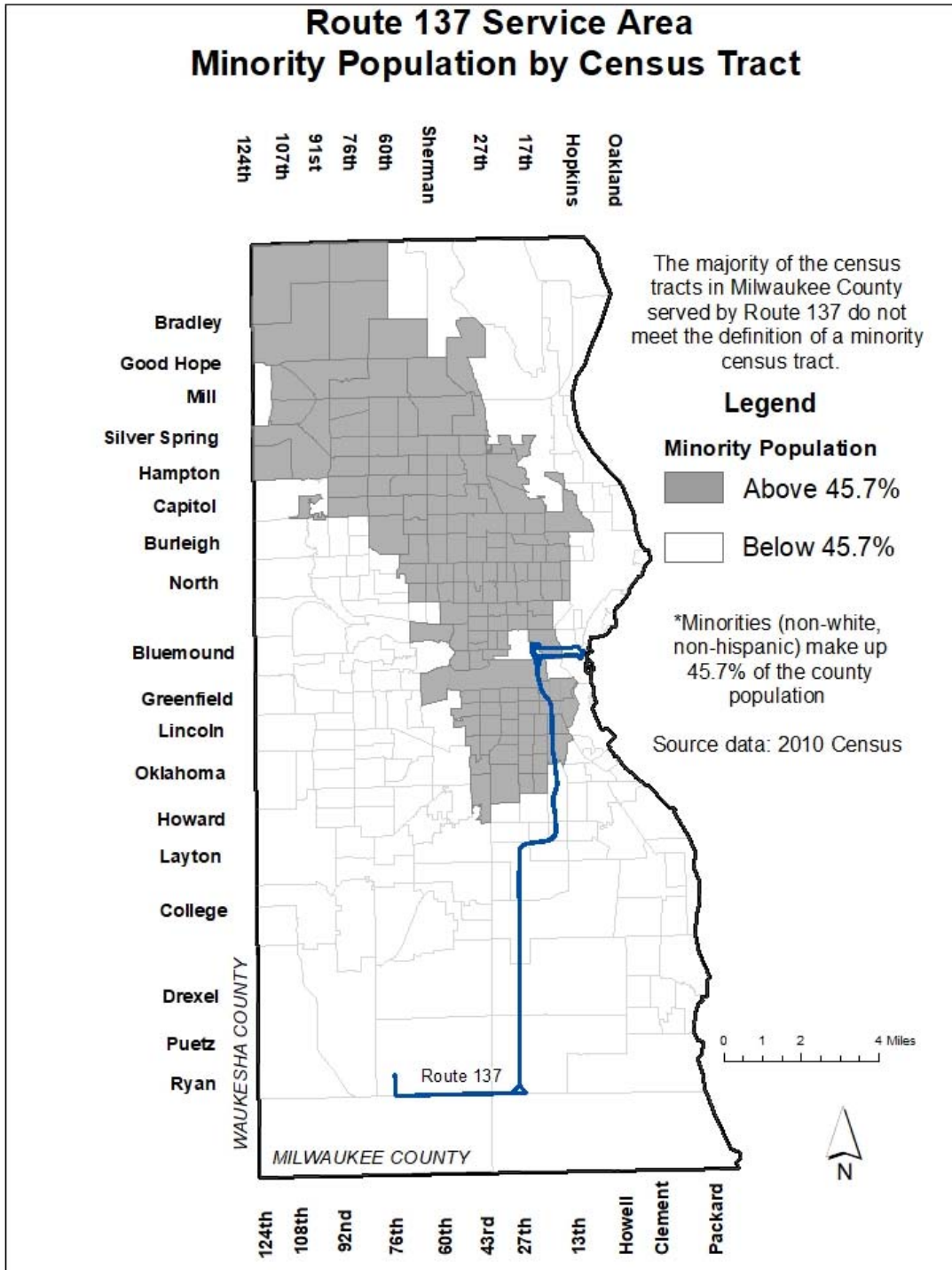
There are no other fixed routes in the vicinity of the HOC that would mitigate the impact of eliminating Route 137.

As was noted earlier, the HOC has mitigated the suspension of Route 137 since March 2020 by providing people with the opportunity to visit family members using video technology. The HOC is also looking to collaborate with community organizations that can provide more flexible transportation options than fixed route bus service. MCTS staff met with HOC representatives to help them work through this process. Finally, private transportation options like taxi cabs, Uber, and Lyft can also help mitigate the impact by giving some people the opportunity to visit the HOC.

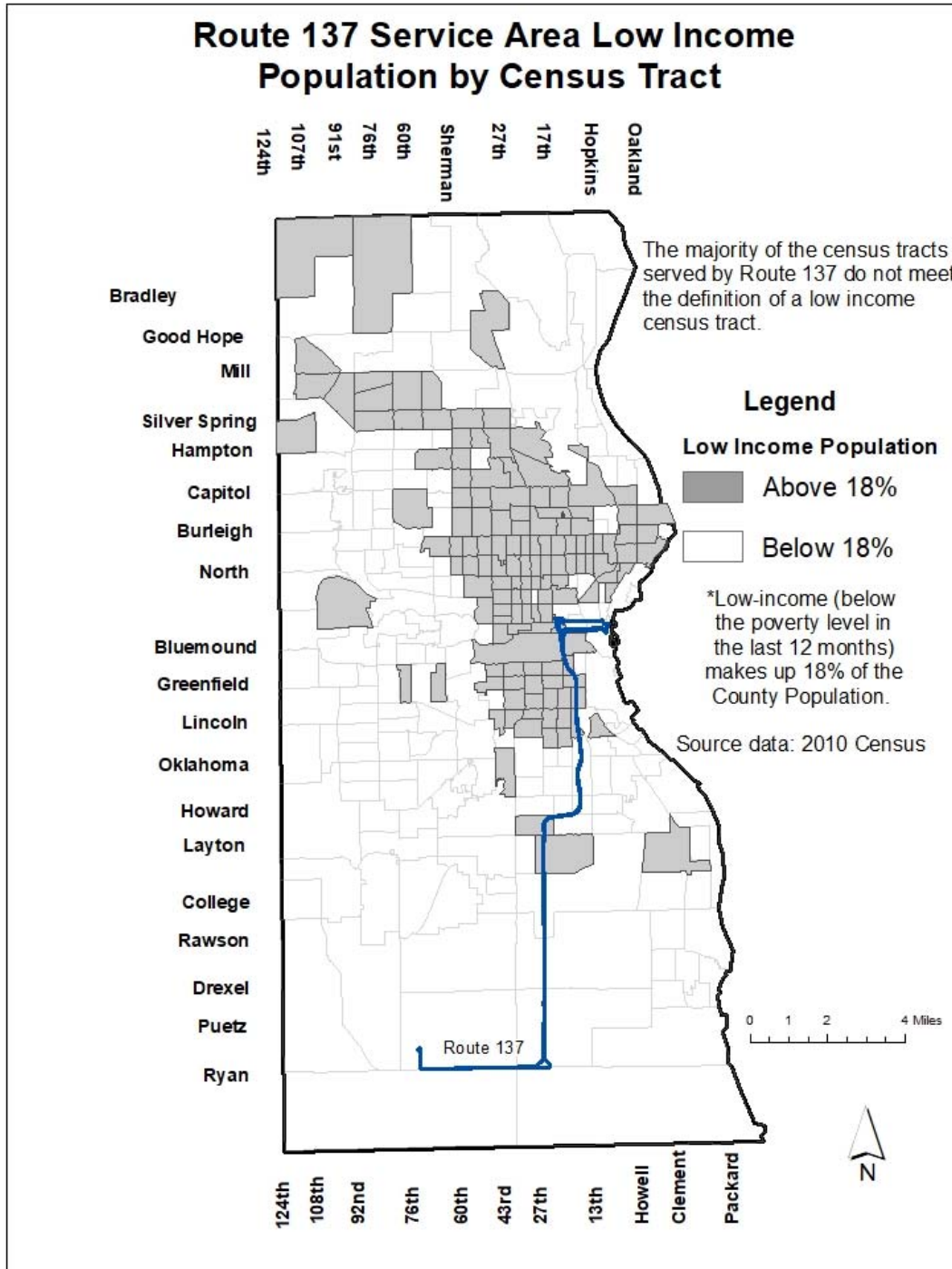
### **SUMMARY**

- Route 137 carried an average of 5 rides/day at 1 passenger per bus hour and is the lowest among all routes in the system. Service was suspended in March 2020 due to the COVID19 pandemic.
- Given the minimal demand for transit service to the HOC and that people can use video technology to visit family members, MCTS recommends Route 137 be discontinued.
- The elimination of Route 137 meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur. As Route 137 is considered to be a minority and low-income route, its elimination would have a disparate impact and a disproportionate burden on the minority and low-income population.
- MCTS can confirm the HOC has mitigated the impact of the suspension of Route 137 since March 2020 by using video technology that allows people to visit family members. The HOC is also looking into collaborating with community organizations that could provide a more flexible transportation option than fixed route bus service. Finally, private transportation options such as Uber and Lyft can give some people the opportunity to visit the HOC.

Map 2.  
 Minority Population in Milwaukee County by Census Tract  
 Route 137 Service Area



Map 3.  
 Low Income Population in Milwaukee County by Census Tract  
 Route 137 Service Area





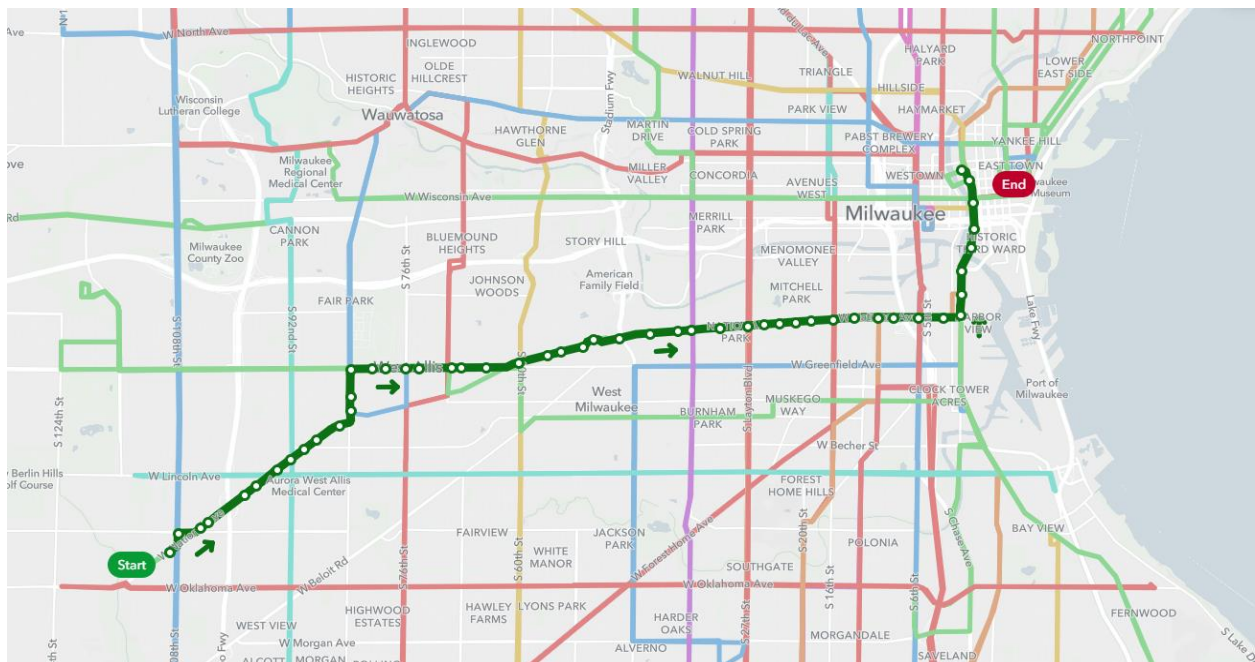
**Milwaukee County Transit System  
Interoffice Memorandum**

TO: File  
 FROM: Tom Bertrand, Transit Planner  
 SUBJECT: SAFE Analysis – Segment Elimination of Route 18  
 DATE: September 29th, 2022

The elimination of service between 84<sup>th</sup> and 112<sup>th</sup> along National Avenue meets the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity Analysis (SAFE). The SAFE indicated whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

**BACKGROUND**

Route 18 (see Map 1) was created to serve residents and businesses in Milwaukee, West Milwaukee, and West Allis via National Avenue and Greenfield Avenue. Its primary destinations are Milwaukee City Hall, Milwaukee Public Market, Clement J Zablocki Veterans Affairs Medical Center, Wisconsin State Fair Park, and Industries for the Blind. This route operates between 5AM and 1:30AM seven days a week totaling approximately 123 in-service hours per weekday. There would be 122 in-service hours after no longer serving National Avenue west of 84<sup>th</sup> Street. In the 21-SEP pick, the stops served west of 84<sup>th</sup> and National carried 205 rides per weekday. Starting on August 28<sup>th</sup>, this portion of the route has been replaced with an extension of Route 54.



(Map 1.)

## DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to 2018 census data, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of Route 18 revealed that does travel through minority and low-income census tracts (Maps 2 and 3). As a result, it was deduced that the elimination of this segment would have a disparate impact on the minority or low-income population.

MCTS also used GIS to analyze how this change would affect minority and low-income people’s access to transit. While the elimination of any route or route segment will have a detrimental effect on everybody’s access to transit service, it was determined that there is no disproportionate impact on low-income populations versus non-low income, or on minority communities compared to non-minority communities. (table 1). Therefore, no mitigation measures are required.

Table 1	Trips Before	Trips After	4/5ths Rule	
Low Income	1356495.00	1303725.00	34.37%	-3.89%
Non-Low Income	1708085.00	1514770.00		-11.32%
Minority	1225665.00	1178175.00	35.88%	-3.87%
Non-Minority	1838915.00	1640320.00		-10.80%
Total	3064580.00	2818495.00		-8.03%

Table 1

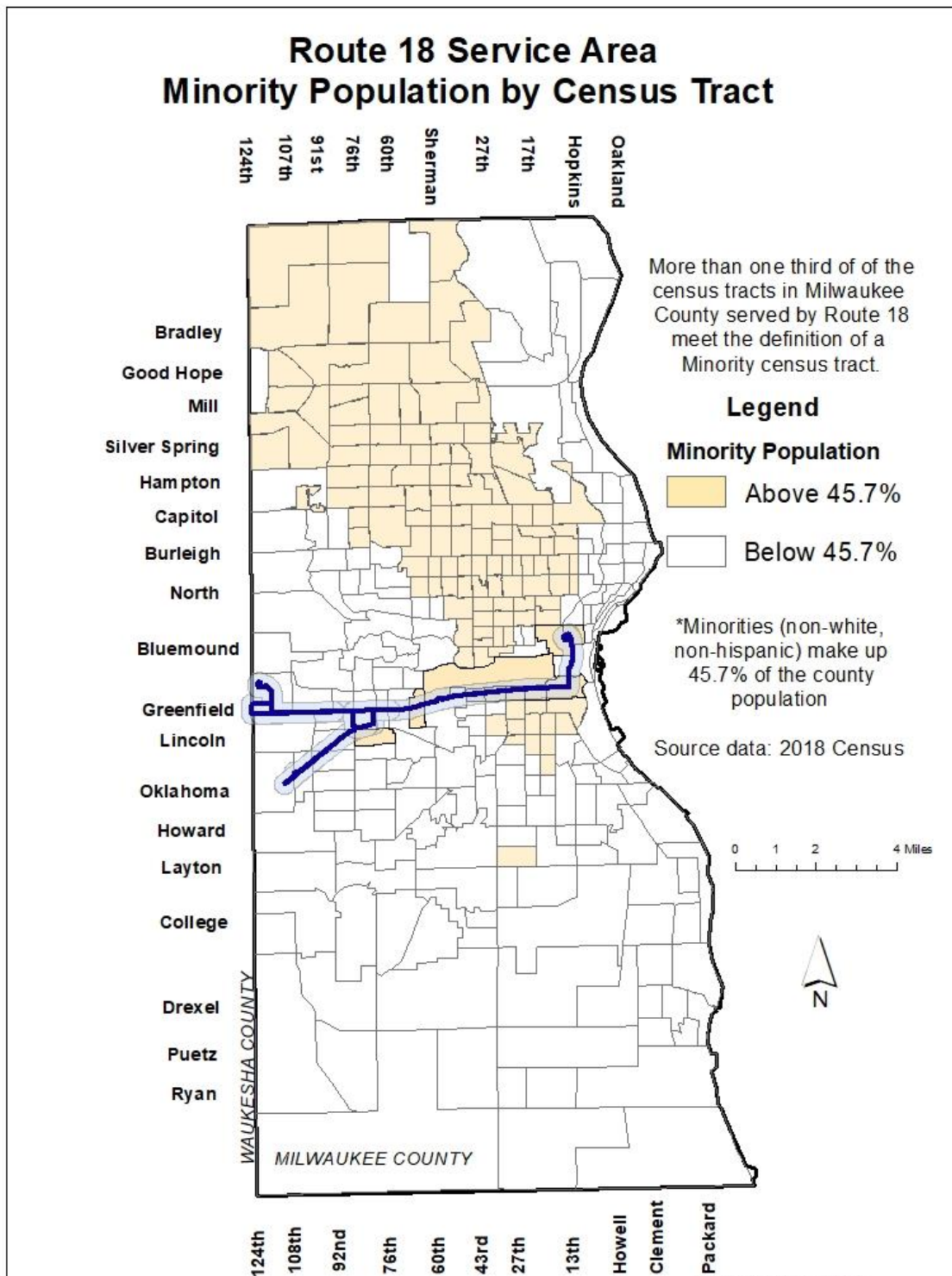
## MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS

No mitigation efforts are needed, however, MCTS is taking steps to ensure the portion National Avenue west of 84<sup>th</sup> Street previously served by Route 18 is still being served by an extension of Route 54.

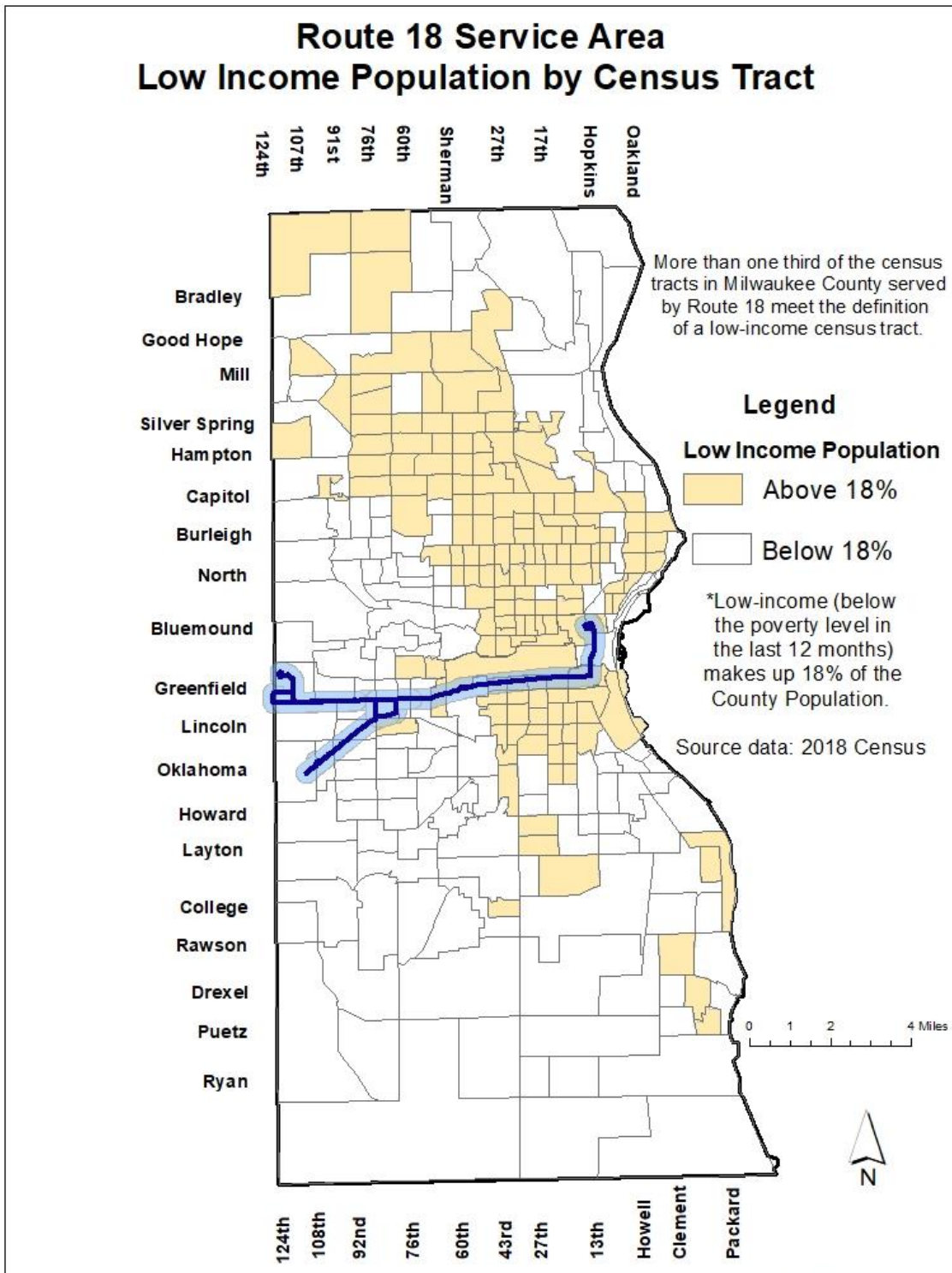
## SUMMARY

- This is a combined routing change in conjunction with Route 54
- This is not an elimination, but a reconfiguration of the MCTS system, with Route 54 being expanded to serve the portion of National Avenue west of 84<sup>th</sup> Street
- This change is occurring in order to extend high-frequency service west along Greenfield Avenue from 84<sup>th</sup> Street to Highway 100

- Route 18 is considered a minority and low-income route, so its segment elimination would be considered to have a disparate impact and a disproportionate burden on the minority and low-income population, respectively



(Map 2.)



(Map 3.)



### DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the 2018 Census, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of Route 54 revealed that does predominantly travel through minority and low-income census tracts (Maps 2 and 3). As a result, it was deduced that the elimination of this segment would have a disparate impact on the minority or low-income population.

MCTS also analyzed how this change would affect minority and low-income people’s access to transit. While the elimination of any route or route segment will have a detrimental effect on everybody’s access to transit service it was determined that there is a disproportionate impact on minority and low-income communities compared to non-minority or non-low-income communities (table 1). Therefore, mitigation measures are required.

Table 1	Trips Before	Trips After	4/5ths Rule	
Low Income	900,540	937,620	6.28%	4.12%
Non-Low Income	669,620	1,108,935		65.61%
Minority	887,130	885,205	-0.31%	-0.22%
Non-Minority	683,030	1,161,350		70.03%
Total	1,570,160	2,046,555		30.34%

### MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS

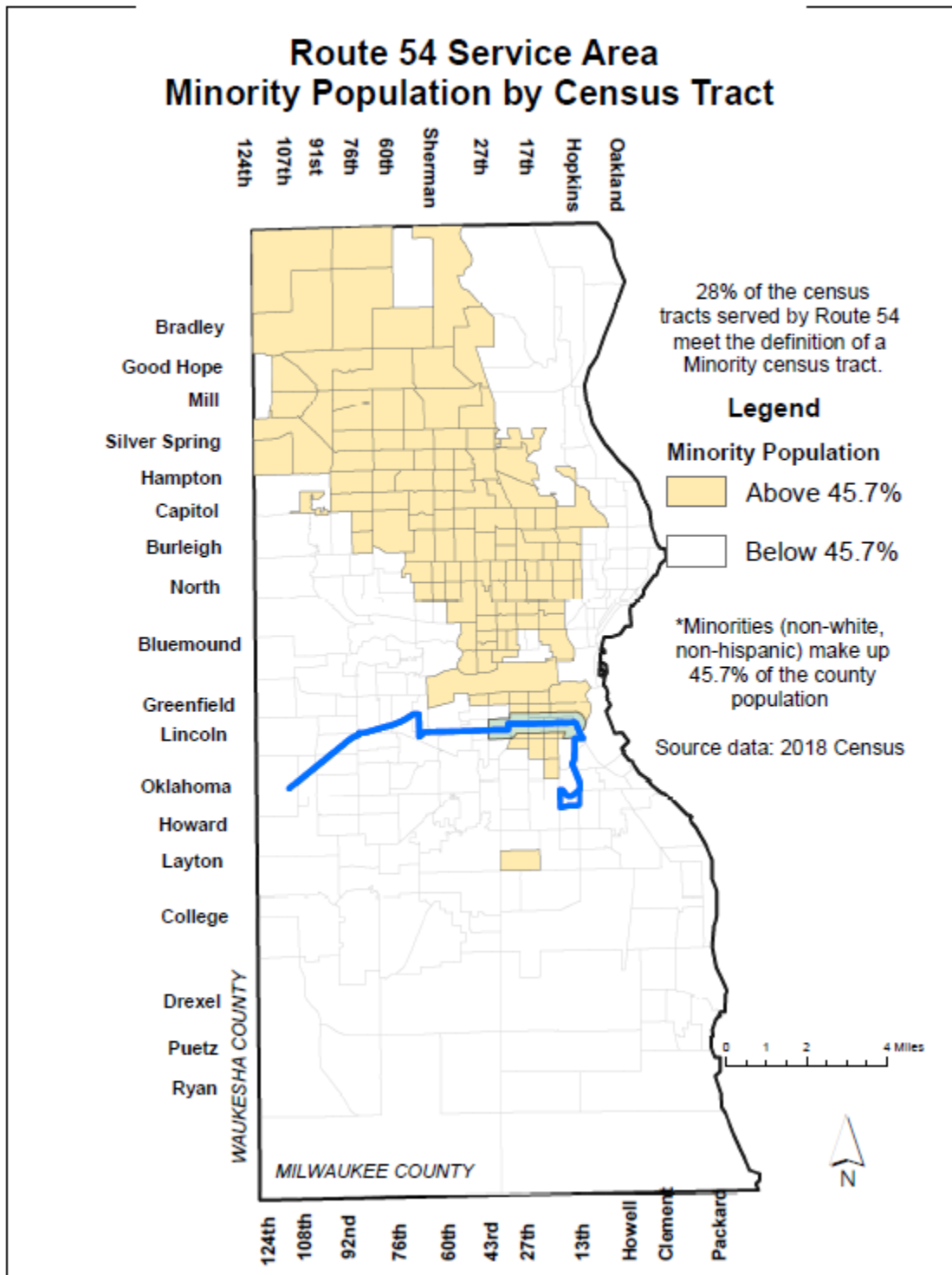
This change would mean low-income and minority riders would be impacted. However, because this change is an extension of service in areas not previously served and is a replacement of Route 18’s National branch, no mitigation is needed.

### SUMMARY

- MCTS has identified several routes to reconfigure to update the network to meet the community’s modern needs and improve the rider experience—Route 54’s extension compliments this goal.

- The extension of this service meets one of the thresholds that trigger a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur.
- Route 54 is considered a low-income route, so its segment elimination would be considered to have a disparate impact and a disproportionate burden on the low-income population, respectively.
- Mitigation is not needed as service as this service is a new extension of previous Route 18.

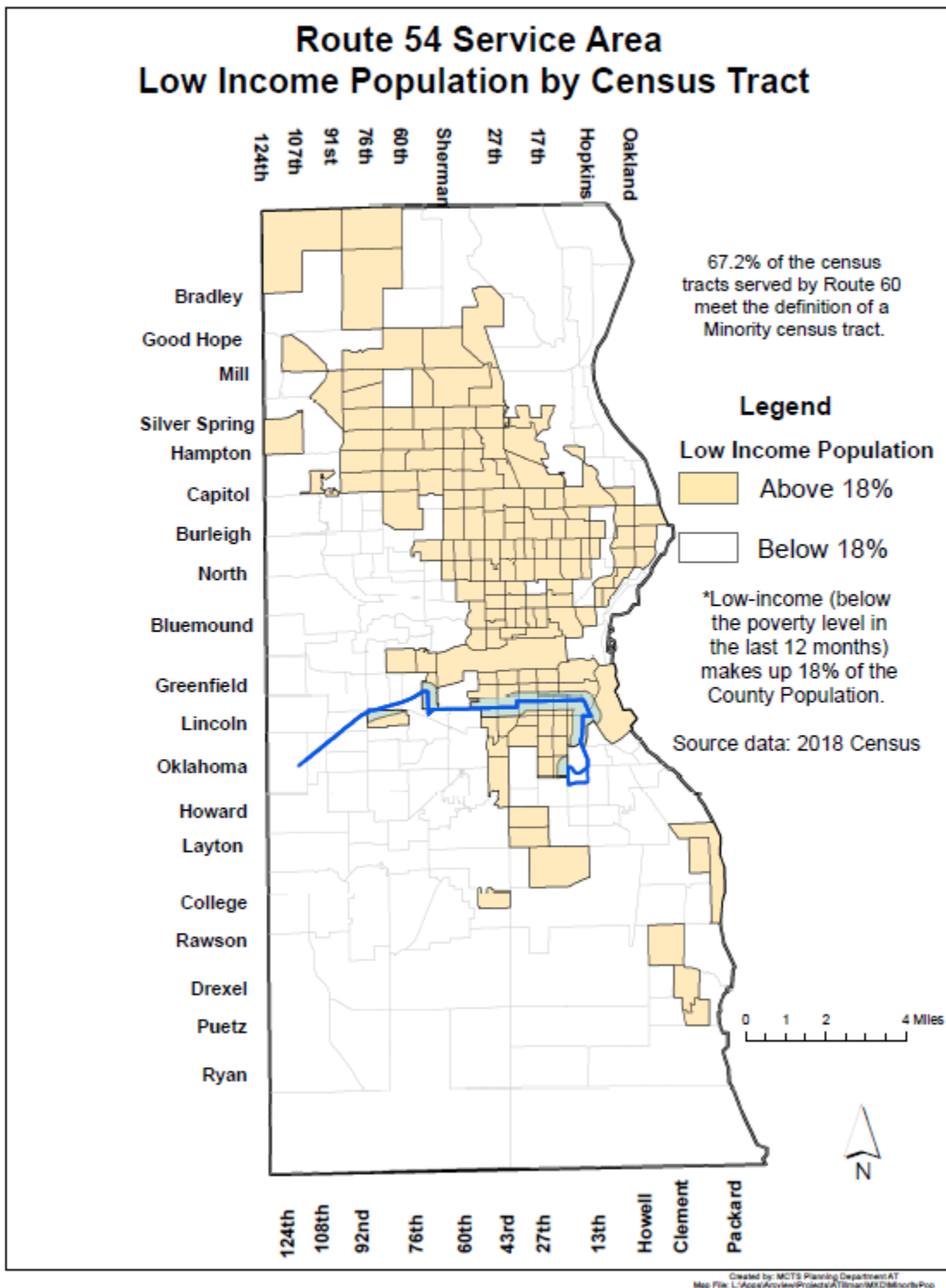
Map 2.  
Minority Population in Milwaukee County by Census Tract  
Route 54 Service Area



Map 3.



Low Income Population in Milwaukee County by Census Tract  
Route 54 Service Area



## Milwaukee County Transit System Interoffice Memorandum

TO: File

FROM: Leean Le, Transit Planning

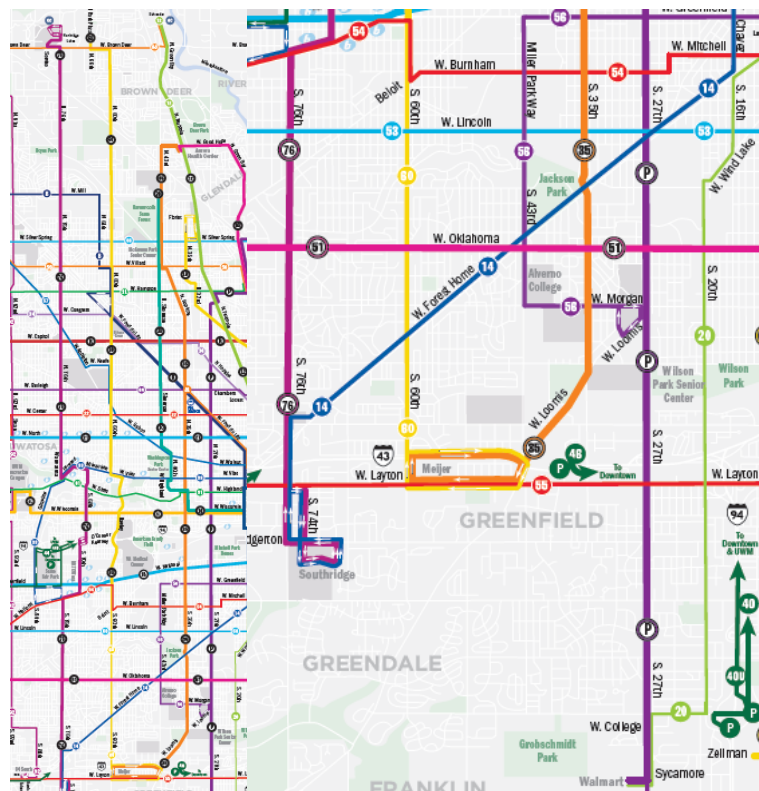
SUBJECT: SAFE Analysis – Segment Elimination of Route 60 (60<sup>th</sup> Street)

DATE: October 3, 2022

The elimination of the one-way loop service between 60<sup>th</sup> & Layton and Southridge on Route 60 (60<sup>th</sup> Street) meets the definition of a major service change and, per FTA rules, requires MCTS prepare a Service and Fare Equity analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize or mitigate the impacts where practicable.

### BACKGROUND

Route 60 (see Map 1) was created to serve residents and businesses in Brown Deer, Milwaukee, West Allis, and Greenfield via 60<sup>th</sup> Street. Its primary destinations are Milwaukee Job Corps Center, Midtown Center, Vision Forward, and Meijer. This route operates ten buses between 5AM and 1AM on weekdays totaling approximately 144 in-service hours per day. There would be 143 in-service hours after no longer serving south 60<sup>th</sup> and Layton. In the 21-SEP pick, the stops served south of 60<sup>th</sup> and Layton to Southridge carried 90 rides per weekday. Based on the cost of operating this one-way loop and low ridership in the area, MCTS has decided this segment will be discontinued. Its last day of service will be August 27<sup>th</sup>, 2022.



(Map 1.)

**DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN**

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the 2018 Census, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of Route 60 revealed that does predominantly travel through minority and low-income census tracts (Maps 2 and 3). As a result, it was deduced that the elimination of this segment would have a disparate impact on the minority or low-income population.

MCTS also analyzed how this change would affect minority and low-income people’s access to transit. While the elimination of any route or route segment will have a detrimental effect on everybody’s access to transit service it was determined that there is no disproportionate impact on low-income populations versus non-low income, however, a disproportionate impact on minority communities compared to non-minority communities. (table 1). Therefore, mitigation measures are required.

<b>Table 1</b>	<b>Trips Before</b>	<b>Trips After</b>	<b>4/5ths Rule</b>	
Low Income	1,311,600	1,369,170	90.96%	4.39%
Non-Low Income	2,377,965	2,492,720		4.83%
Minority	1,909,805	1,978,805	62.23%	3.61%
Non-Minority	1,779,760	1,883,085		5.81%
Total	3,689,565	3,861,890		4.67%

**MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS**

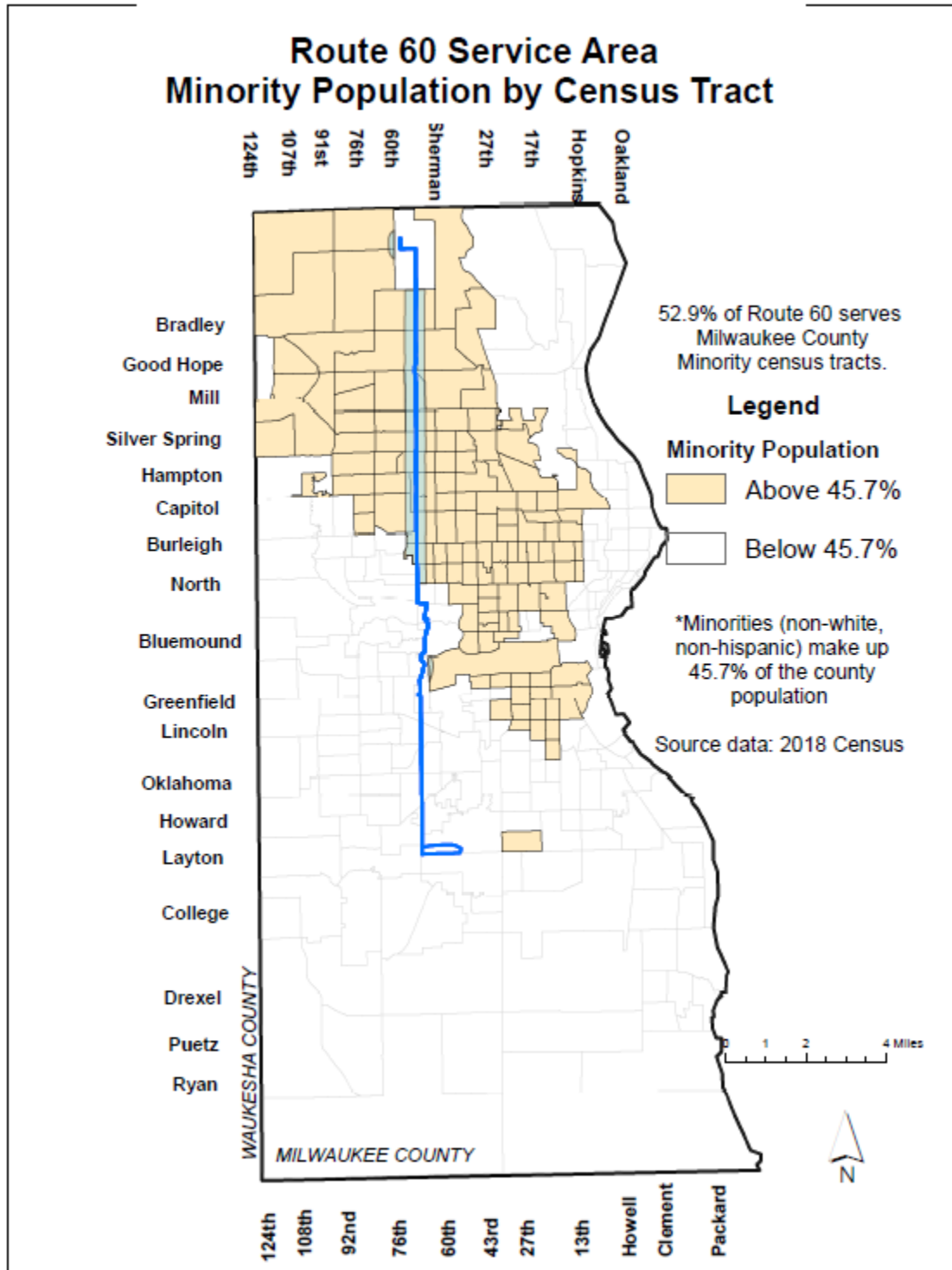
There will be a temporary extension on Route 76 enacted to serve the majority of riders on this eliminated segment until a permanent solution is developed.

**SUMMARY**

- MCTS has identified several low productivity routes to eliminate to balance the operating budget—one of those being eliminating the one-way service between 60<sup>th</sup> & Layton and Southridge on Route 60.
- The elimination of this service meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur.

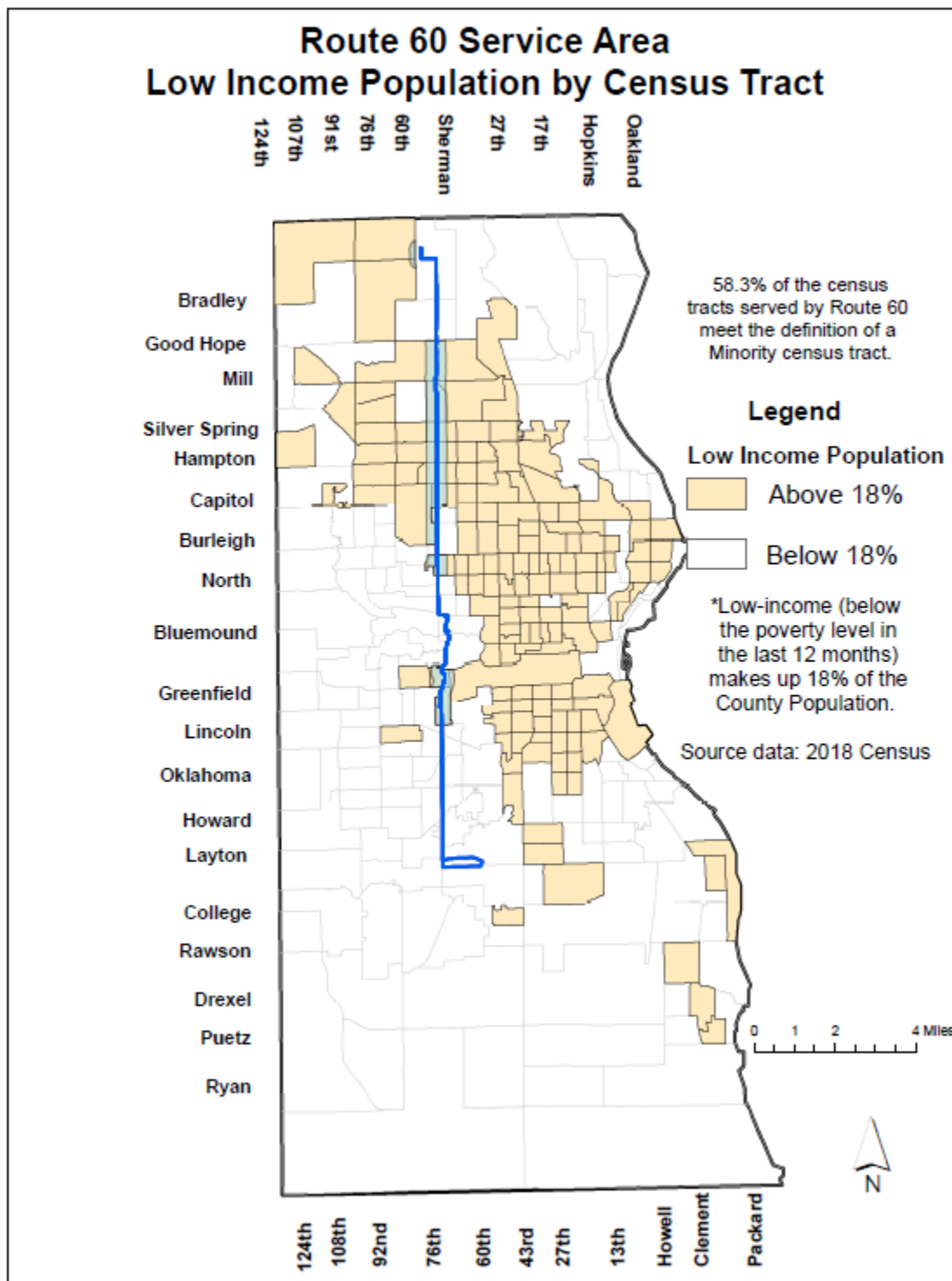
- Route 60 is considered a minority and low-income route, so its segment elimination would be considered to have a disparate impact and a disproportionate burden on the minority and low-income population, respectively.
- Route 76 will be extended to mitigate this elimination and serve the majority of riders in the area until a permanent solution can be fleshed out.

Map 2.  
Minority Population in Milwaukee County by Census Tract  
Route 60 Service Area



60 Service Area

Map 3.  
 Low Income Population in Milwaukee County by Census Tract  
 Route 60 Service Area



**Milwaukee County Transit System  
Interoffice Memorandum**

TO: File

FROM: Tom Bertrand, Transit Planner

SUBJECT: SAFE Analysis – Flyer Routes

DATE: December 1<sup>st</sup>, 2022

As part of the 2023 Milwaukee County Recommended Budget, the following routes will be eliminated to help balance a \$4 million budget shortfall:

- 1) Route 40 (College Avenue Flyer)
- 2) Route 43 (Hales Corners Flyer)
- 3) Route 44 (State Fair Park Flyer)
- 4) Route 46 (Loomis Flyer)
- 5) Route 48 (South Shore Flyer)
- 6) Route 49 (Brown Deer-Bayshore Flyer)

These eliminations meet the definition of a major service change and per FTA rules, MCTS is required to prepare a Service and Fare Equity (SAFE) analysis. The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize or mitigate the impacts where practicable.

**BACKGROUND**

MCTS' Freeway Flyer routes provided peak-only express service between various Park & Ride lots throughout Milwaukee County to Downtown Milwaukee (See Map 1). This service provided an alternative for workers who did not want to or cannot park in or drive to Downtown Milwaukee. Morning service span ranged from 5:30AM to 8:30AM while afternoon/evening service span ranged from 3:30PM to 6:30PM. Average weekday ridership on each Freeway Flyer route in Fall 2019 was as follows:

Route	Rides per Weekday	In-Service Hours per Weekday	Passengers per Bus Hour
40	173	15.5	11.2
43	172	13.1	13.2
44	95	10.1	9.4
46	103	12.6	8.2
48	160	11.3	14.2
49	152	16.9	9.0

In order to save funds throughout the pandemic to put towards operating more productive routes that serve thousands of riders each day, and due to nearly all major businesses in Downtown Milwaukee closing to in-person employment since March 2020, MCTS suspended service on these routes until further notice on March 20<sup>th</sup>, 2020. Service resumed in August 2021, but was eliminated completely in January 2023.

Map 1.  
MCTS Freeway Flyer Route Network



**DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN**



In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the 2010 Census, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population. A GIS analysis of the MCTS Freeway Flyer Network revealed that the network of routes predominantly serves non-minority and non-low-income census tracts (Maps 2 and 3).

MCTS also analyzed how this change would affect minority and low-income peoples’ access to transit. While the elimination of any route will have a detrimental effect on everybody’s access to transit service, it was determined that the impact on minority and low-income communities was not disproportionate (Table 1). Per FTA Circular 4702.1B rules, if the percent change for minority tracts (-0.53%) is lower than for non-minority tracts (-0.72%), the impact ratio is scored as 100%, i.e., the impact of the service reduction will be greater on non-minority passengers than on minority passengers. Similarly, if the percent change for low-income tracts (-0.18%) is lower than for non-low-income tracts (-1.16%), the impact ratio is scored as 100%, i.e., the impact of the service reduction will be greater on non-low-income passengers than on low-income passengers. Therefore, no mitigation measures are required.

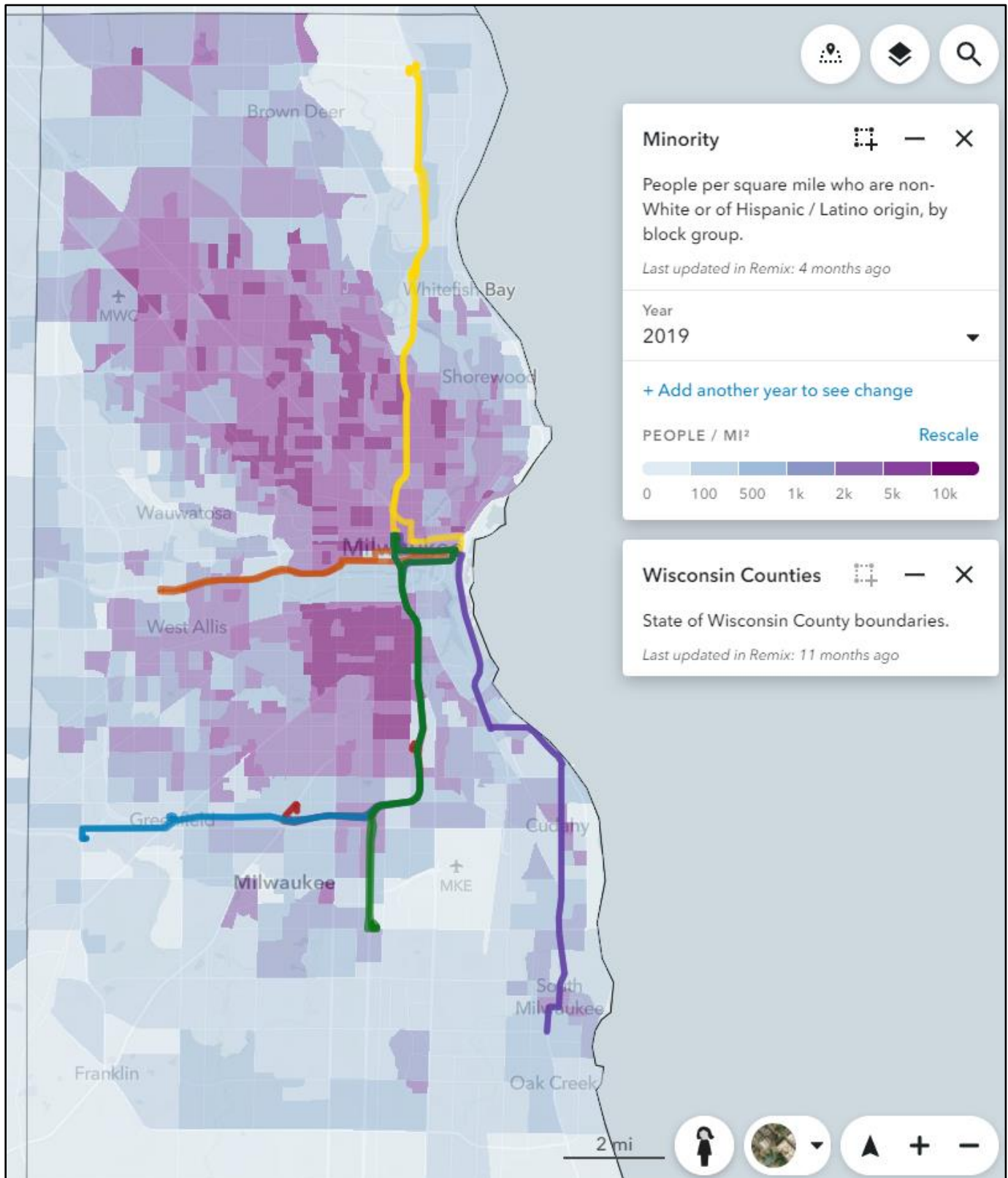
<b>Table 1</b>	<b>Trips Before</b>	<b>Trips After</b>	<b>4/5ths Rule</b>	<b>Percent Change</b>
Low Income	55,928,735	55,630,385	135.14% (100%)	-0.53%
Non-Low Income	45,136,290	44,810,910		-0.72%
Minority	56,029,025	55,925,495	625.11% (100%)	-0.18%
Non-Minority	45,036,000	44,515,800		-1.16%
Total	101,065,025	100,441,295		

## **SUMMARY**

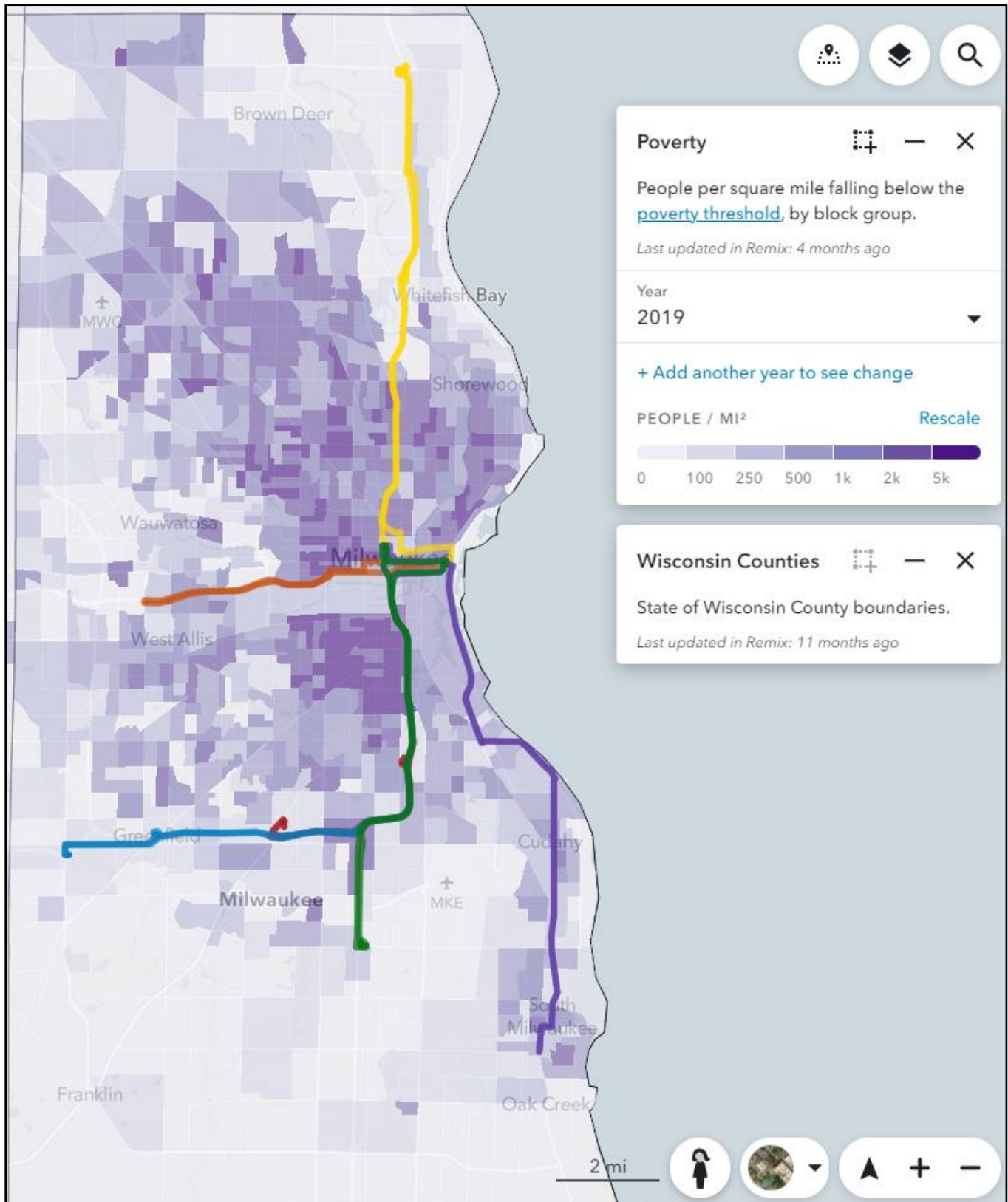
- MCTS eliminated freeway flyers in January 2023 as a part of the 2023 Milwaukee County Recommended Budget.
- Per FTA rules, a SAFE analysis is required.
- The MCTS Freeway Flyer Route network is not composed of minority or low-income routes, and their elimination does not have a disparate impact on minority or disproportionate burden low-income communities.
- Furthermore, the percent reduction in service in minority and low-income census tracts is less than the percent reduction in service in non-minority and non-low-income census tracts, also proving their elimination does not have a disparate impact on minority or disproportionate burden low-income communities.

Map 2.

### Minority Population in Milwaukee County by Census Tract



Map 3.  
Low Income Population in Milwaukee County by Census Tract



**Milwaukee County Transit System  
Interoffice Memorandum**

TO: File

FROM: Tom Bertrand, Transit Planner

SUBJECT: SAFE Analysis – Elimination of Route 137 (House of Corrections)

DATE: December 1<sup>st</sup>, 2022

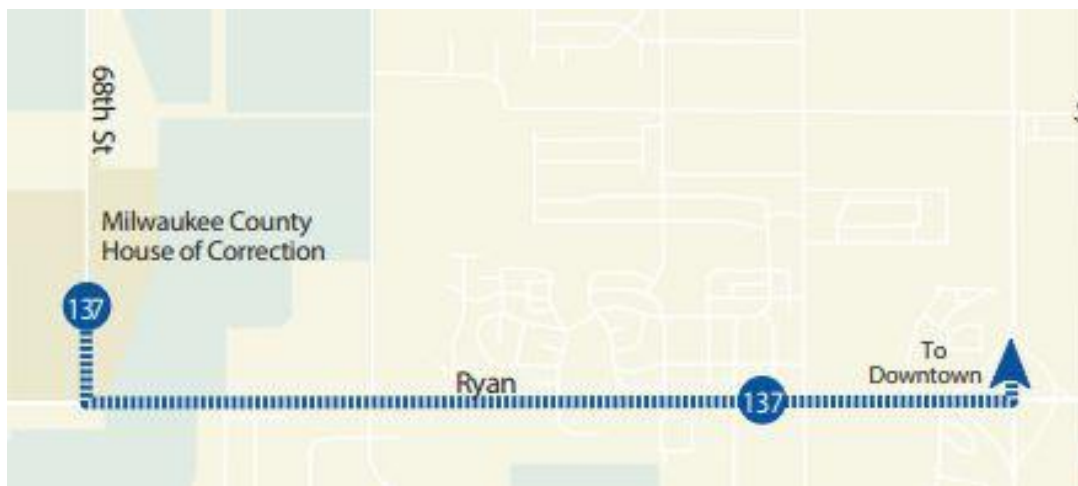
The elimination of Route 137 (House of Corrections) meets the definition of a major service change and, per FTA rules, requires MCTS prepare a Service and Fare Equity analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must identify steps that can be taken to avoid, minimize or mitigate the impacts where practicable.

**BACKGROUND**

Route 137 (see Map 1) was created to serve the House of Corrections (HOC) in Franklin from Downtown Milwaukee. This route operated exclusively on Saturdays and stopped along the busiest corridor in the system, Wisconsin Avenue in downtown Milwaukee, giving riders the chance to connect to this route at a transfer corner. This route operated using one bus between 8:30 AM and 1:00 PM totaling 4.7 bus hours per day.

Route 137 carried an average of 5 rides at a productivity level of 1 passenger per bus hour and was the lowest of any route in the MCTS system. After the start of the COVID-19 pandemic in March 2020, service on the route was suspended. At that time, the HOC introduced video technology to allow people to visit with members of their family. Given the minimal demand for transit service to the HOC and the option to use video technology to visit family members, Route 137 was officially eliminated as a part of the Milwaukee County Recommended Budget in January 2023.

Map 1.  
Route 137 Service Area



### **DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN**

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population. According to the 2010 Census, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of Route 137 revealed that it does not predominantly travel through minority and low-income census tracts (Maps 2 and 3). However, most routes that connect with Route 137 are characterized as being minority routes. As such, it was deduced the elimination of Route 137 would have a disparate impact on the minority population and a disproportionate burden on the low-income population.

### **MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS**

There are no other fixed routes in the vicinity of the HOC that would mitigate the impact of eliminating Route 137.

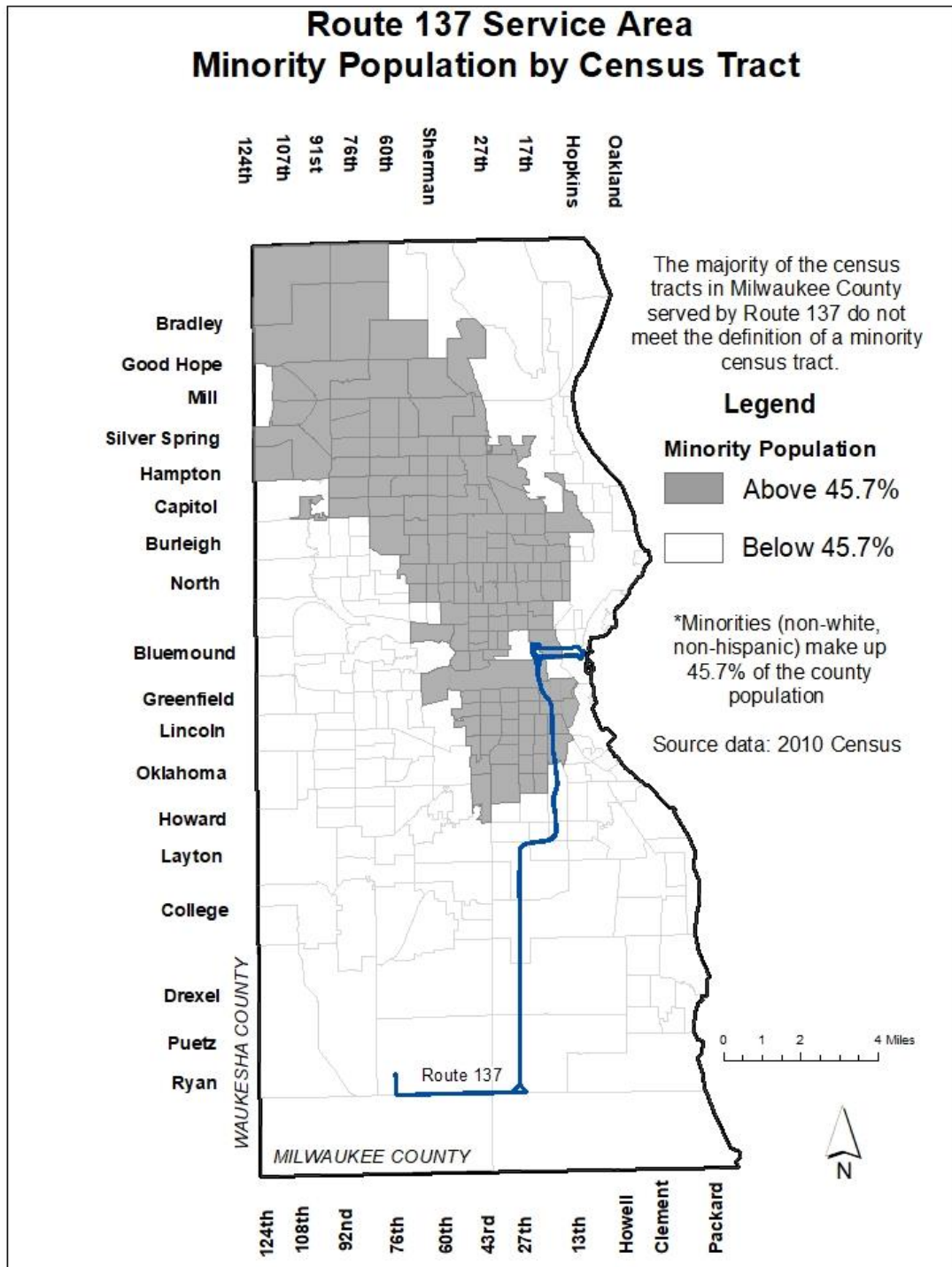
As was noted earlier, the HOC mitigated the suspension of Route 137 in March 2020 by providing people with the opportunity to visit family members using video technology. They have since returned to providing in-person visits.

### **SUMMARY**

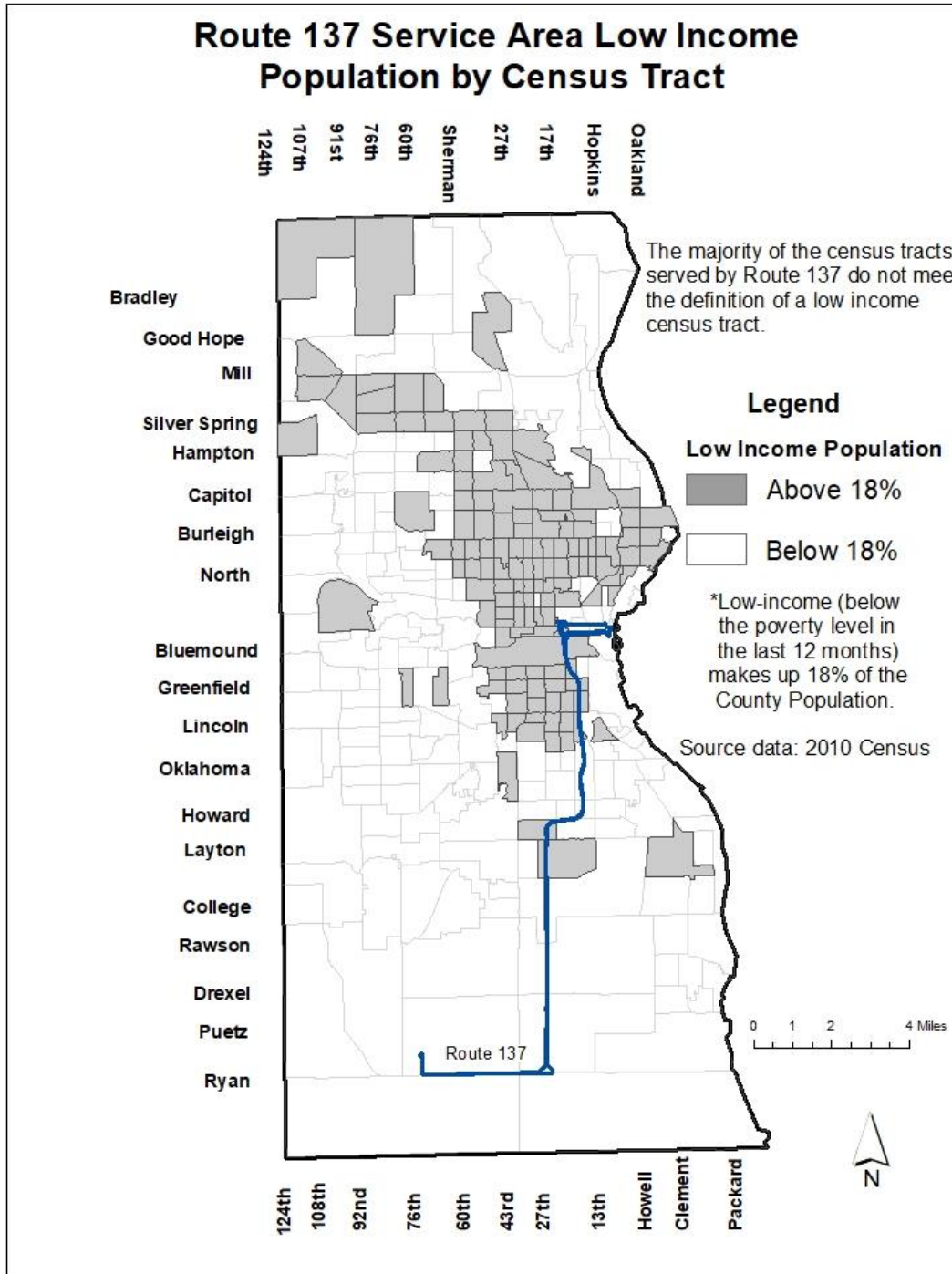
- Route 137 carried an average of 5 rides/day at 1 passenger per bus hour and is the lowest among all routes in the system. Service was suspended in March 2020 due to the COVID19 pandemic.
- Given the minimal demand for transit service to the HOC and that people can use video technology to visit family members, MCTS recommends Route 137 be discontinued.
- The elimination of Route 137 meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur. As Route 137 is considered to be a minority and low-income route, its elimination would have a disparate impact and a disproportionate burden on the minority and low-income population.
- MCTS can confirm the HOC has mitigated the impact of the suspension of Route 137 since March 2020 by using video technology that allows people to visit family members. Finally, private transportation options such as Uber and Lyft can give some people the opportunity to visit the HOC.

Map 2.

Minority Population in Milwaukee County by Census Tract  
Route 137 Service Area



Map 3.  
 Low Income Population in Milwaukee County by Census Tract  
 Route 137 Service Area



## Milwaukee County Transit System Interoffice Memorandum

TO: File

FROM: Tom Bertrand, Transit Planner

SUBJECT: SAFE Analysis – Segment Elimination of Route 14 (Wisconsin Ave - Forest Home)

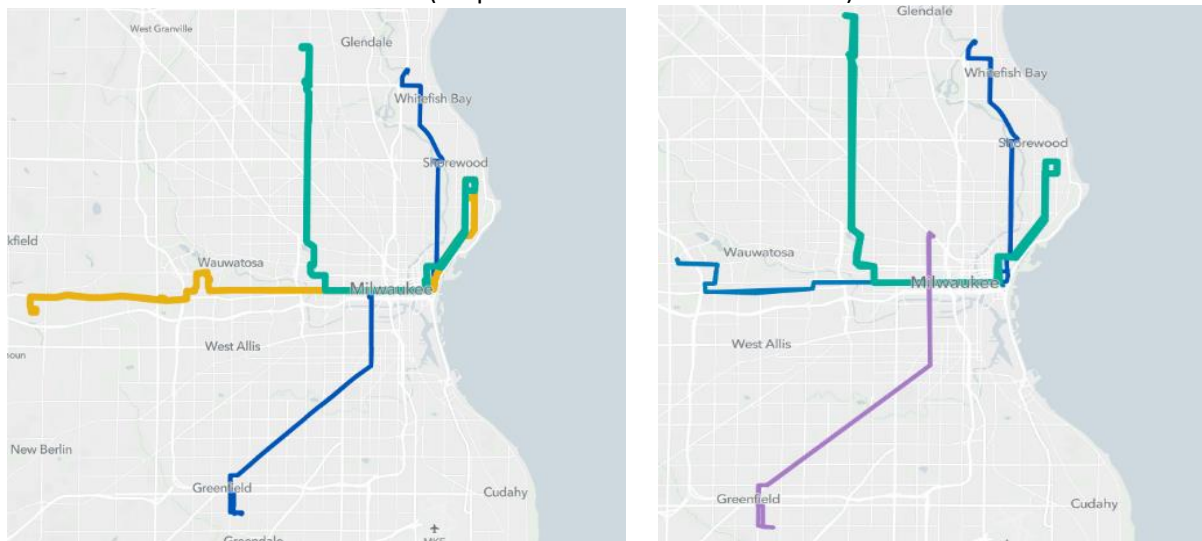
DATE: December 14<sup>th</sup>, 2022

The elimination of service on Route 14 between Wisconsin & Cass and S. 74<sup>th</sup> Street meets the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize or mitigate the impacts where practicable.

### BACKGROUND

Route 14 (See Map 1) was created to serve residents and businesses in Milwaukee, Shorewood, Whitefish Bay, and Greenfield via Humboldt Avenue, Wisconsin Avenue, and Forest Home Avenue. As of Spring 2023, its primary destinations were Bayshore Mall, Downtown Milwaukee, Marquette University, Historic Mitchell Street, and Southridge Mall. With the start of the summer service period on June 4<sup>th</sup> 2023, the latter three destinations will no longer be served by Route 14 and the route will end in downtown Milwaukee. The new Route 24 will assume the previous Route 14 routing between Southridge Mall and Wisconsin & 16<sup>th</sup>, continuing northward to 17<sup>th</sup> & Fond Du Lac at the MCTS Administration Building. This change was made in order to improve reliability and schedule adherence and provide access to our administration building from the southern part of the county, as well as to complement the new Connect 1 BRT.

(Map 1. – March 2023 & June 2023)





### DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the 2018 Census, the minority population (defined as everyone not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population. A GIS analysis of Route 14 revealed that it does predominantly travel through minority and low-income census tracts (Maps 2 and 3). As a result, it was deduced that the elimination of this segment would have a disparate impact on the minority or low-income population.

MCTS also analyzed how this change would affect minority and low-income people’s access to transit. While the elimination of any route or route segment will have a detrimental effect on everybody’s access to transit service, it was determined that there is no disproportionate impact on low-income populations versus non-low income, as well as impact on minority versus non-minority.

Table 1	Trips Before	Trips After	4/5ths Rule	
Low Income	9,161,580	10,127,040	191.50%	10.54%
Non-Low Income	5,717,890	6,032,550		5.50%
Minority	6,610,440	7,857,555	4726.62%	18.87%
Non-Minority	8,269,030	8,302,035		0.40%
Total	14,879,470	16,159,590		8.60%

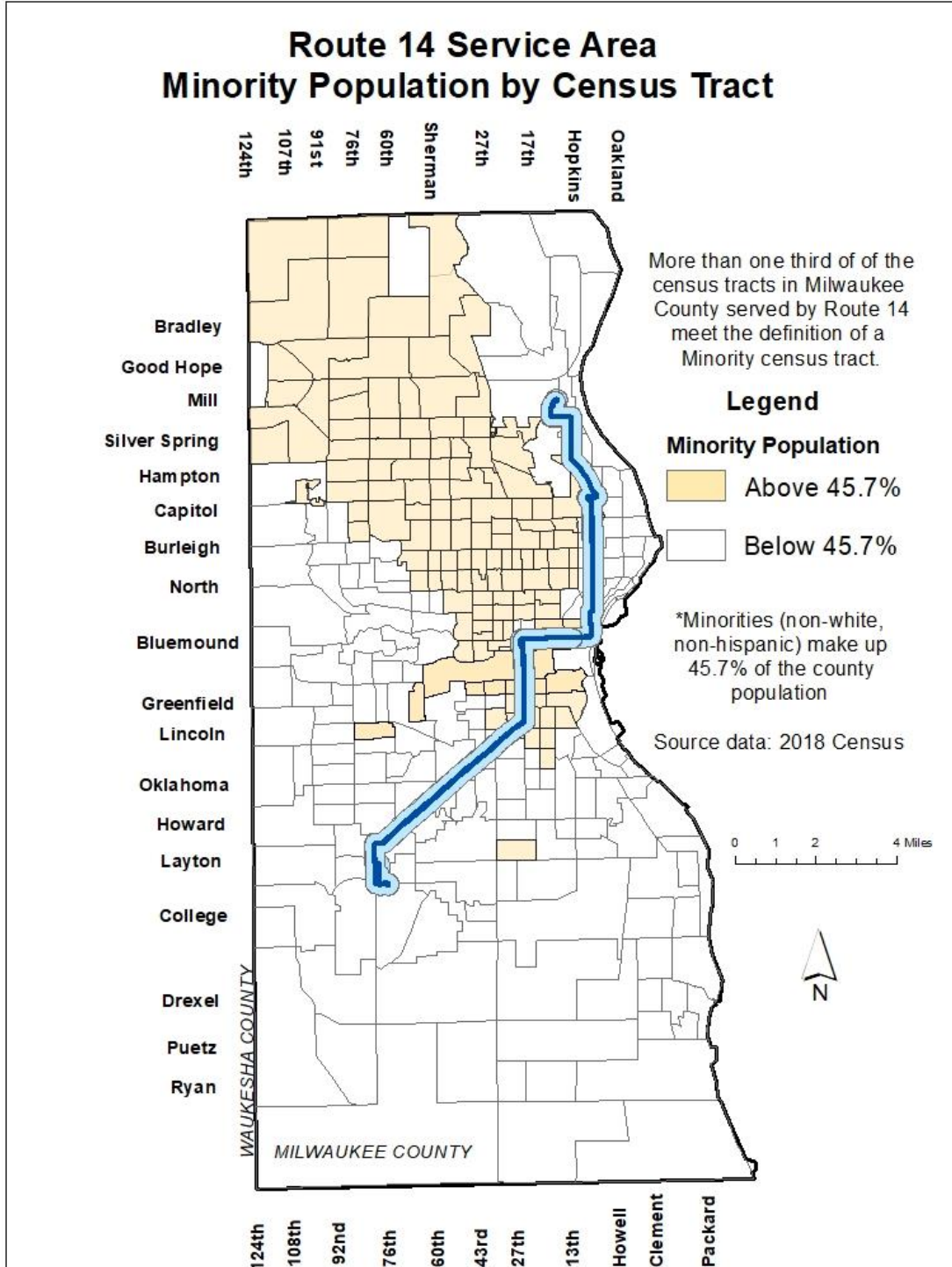
### MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS

MCTS has made changes to other routes with the goal of mitigating potential impacts of the splitting of Route 14 into two separate routes. The frequency of the new Route 14 will be increased to every 16 minutes compared to 22-25 minutes as it was before to help riders get to their destination faster. With increased frequency of Route 30, riders on Wisconsin Avenue can now expect 5 minute headways between that route and the Connect 1 BRT. This will allow riders to transfer quickly between Route 14 and the new Route 24 at 16<sup>th</sup> Street. While Route 14 is being shortened, the southern end is being replaced by Route 24 which uses the same stops along Forest Home Avenue and 16<sup>th</sup> Street.

**SUMMARY**

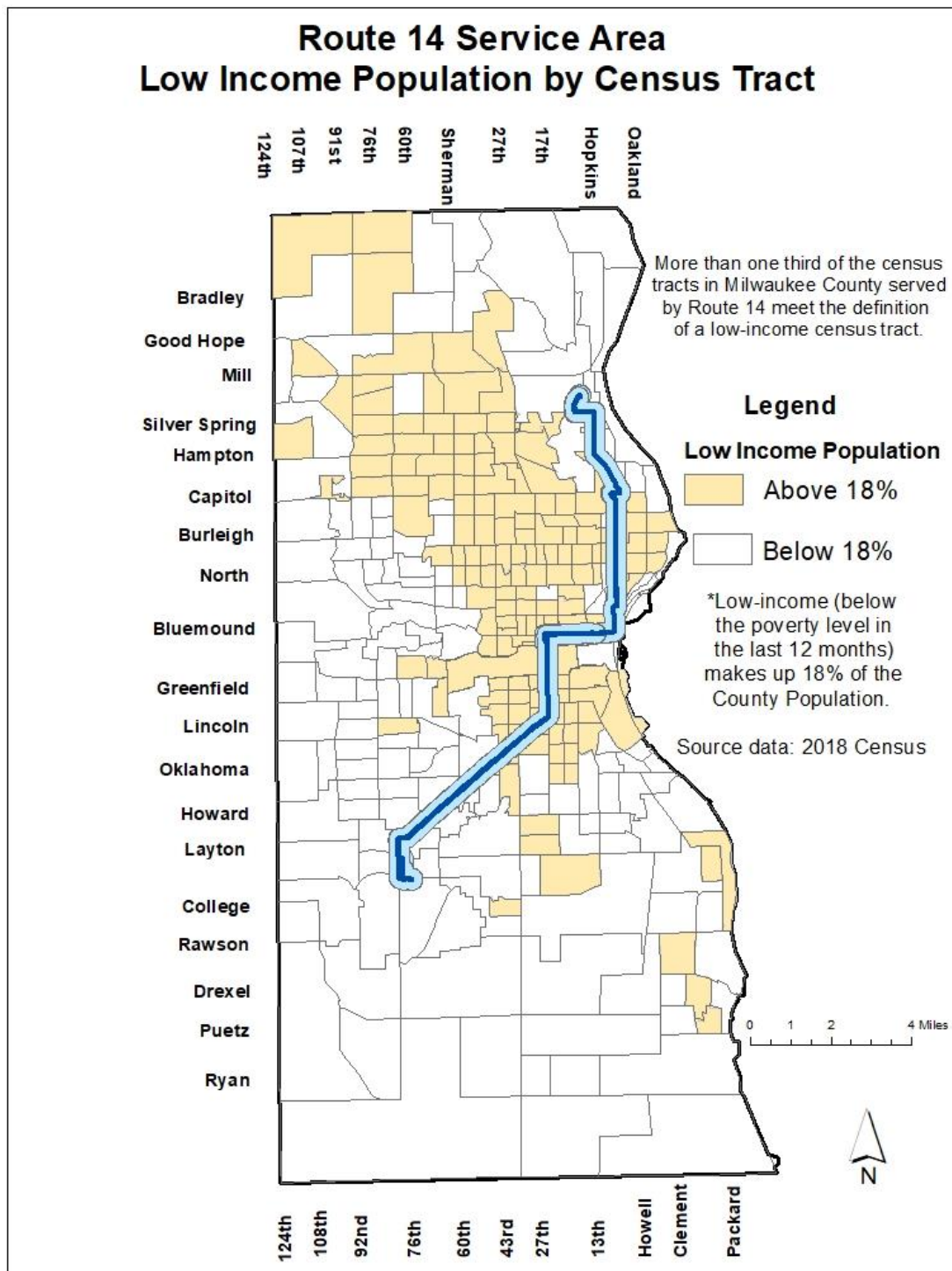
- MCTS has identified Route 14 as needing better on-time performance and reliability to riders. Route 14 effectively is split into two Routes, with the new Route 24 sharing the southern end of the previous route and continuing northward to the MCTS Administration Building.
- This meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur.
- Route 14 is considered a minority and low-income route, so its segment elimination would be considered to have a disparate impact and a disproportionate burden on the minority and low-income population, respectively. An analysis shows that the overall breadth of changes made to mitigate the elimination of Route 14 would not, however, allow for a detrimental impact on transit access to minority and low-income populations.
- The new Route 14 will see increased frequency of service to improve the time it takes riders to reach their destination.
- The stretch of Wisconsin Avenue between the New Routes 14 and 24 will see the fastest service in the MCTS system- 5 minutes between Route 30 and the Connect 1 BRT. Riders can use this service to transfer between Routes 14 and 24.

Map 2.  
 Minority Population in Milwaukee County by Census Tract  
 Route 14 Service Area



Created by: MCTS Planning Department

Map 3.  
 Low Income Population in Milwaukee County by Census Tract  
 Route 14 Service Area



Created by: MCTS Planning Department

**Milwaukee County Transit System  
Interoffice Memorandum**

TO: File

FROM: Emmanuel Okoro, Transit Planner

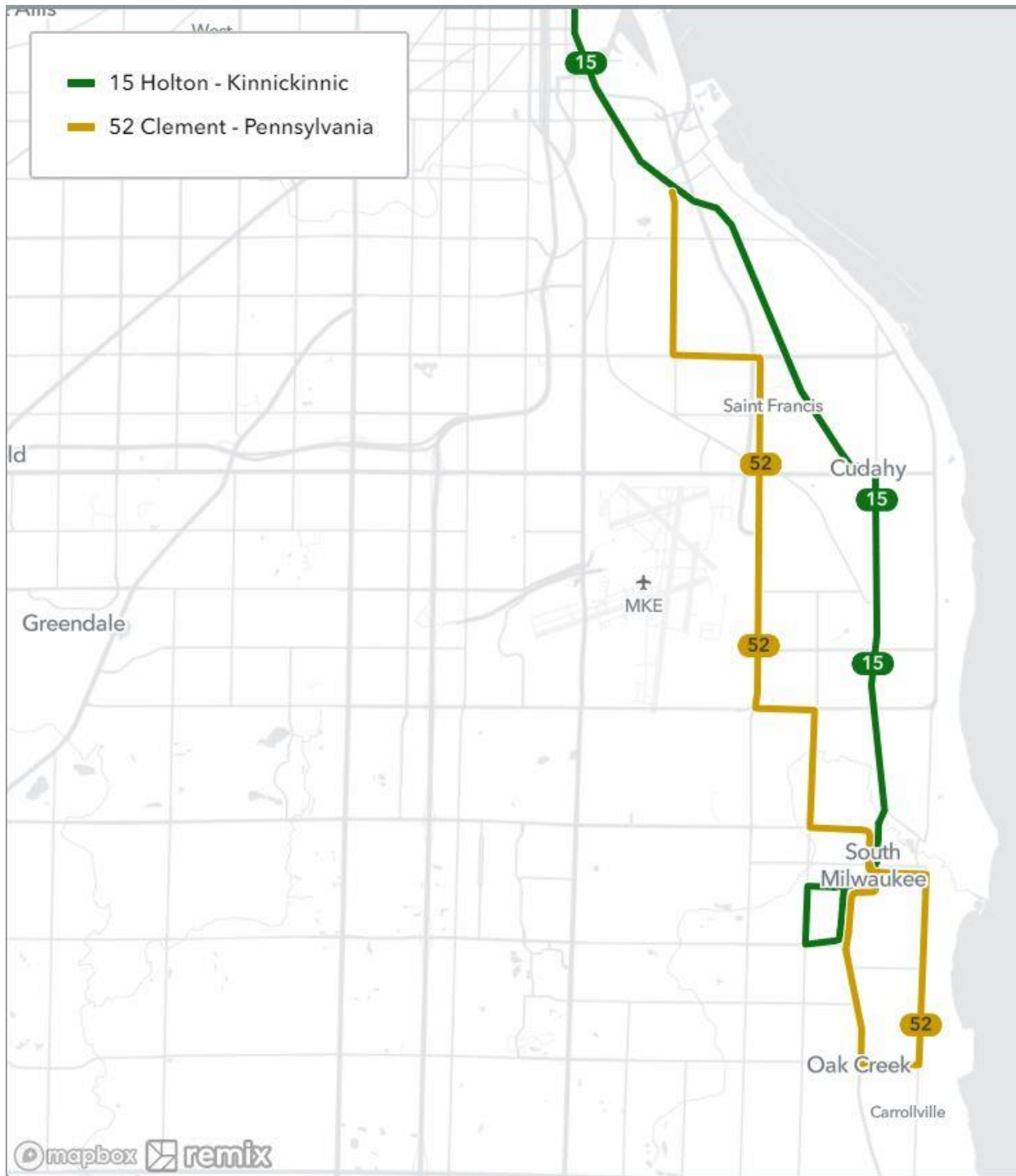
SUBJECT: SAFE Analysis – Segment Elimination of Route 52

DATE: November 9th, 2022

As part of the 2023 Milwaukee County Recommended Budget, Route 52 will be shortened at College Avenue and terminate at the Kelly Senior Center to help balance a \$4 million budget shortfall. The reconfigured service on the southern end of Route 52, south of College Ave between College & 15<sup>th</sup> and Chicago & Puetz meets the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity Analysis (SAFE). The SAFE indicated whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

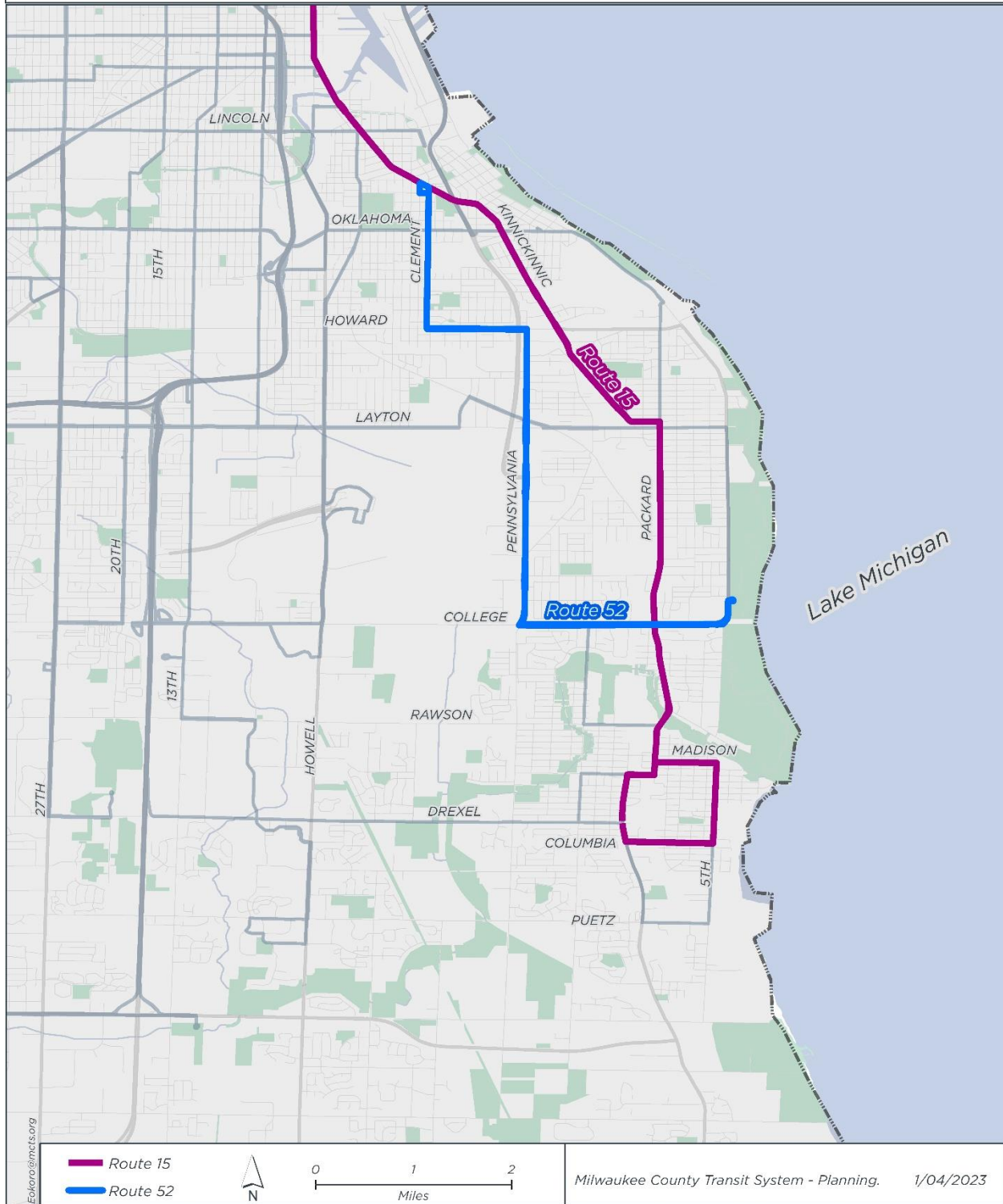
**BACKGROUND**

Route 52 (see Map 1) was created to serve residents and businesses in the Cities of Milwaukee, St. Francis, Cudahy, and South Milwaukee. It operates on major streets such as Clement Ave, Howard Ave, Pennsylvania, College Ave, and 15<sup>th</sup> Ave, 5<sup>th</sup> Ave, Puetz Rd. and Chicago Rd. Route 52 is considered a daytime route which only operates between 6 AM and 8 PM seven days a week totaling approximately 28 in-service hours per weekday, 28 in-service hours on Saturdays and 25 in-service hours on Sundays. This change does not affect the current in-service hours would remain the after no longer serving south of College Ave. Current ridership is showing that stops served south of College Ave carry 68 rides per weekday, which amounts to 31% of the overall weekday rides or 219 rides per weekday. With that being said, starting on March 5<sup>th</sup>, 2023, most of those stops will be served with a newly modified and more frequent Route 15.



(Map 1.)

# Restructured Routes 15 & 52 (Spring 2023)



(Map 2.)

## DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to 2018 census data, the minority population (defined as everyone, not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near the south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of Route 52 revealed that the route does not travel through minority tracts, and low-income census tracts currently served by the route are less than one-third of the route’s mileage. (Maps 2 and 3). Additionally, the segment of the route that are in the low-income census tracts will still be served by more frequency service on Route 15. As a result, it was deduced that the reconfiguration of Route 52 would not have a disparate impact on the minority or low-income population.

MCTS also used GIS to analyze how this change would affect minority and low-income people’s access to transit. While the elimination of any route or route segment will have a detrimental effect on everybody’s access to transit service, it was determined that there is no disproportionate impact on low-income populations versus non-low-income, or on minority communities compared to non-minority communities as both percentages did not cross the 80% threshold. Therefore, no mitigation measures are required.

<b>Table 1</b>	<b>Trips Before</b>	<b>Trips After</b>	<b>4/5ths Rule</b>	
Low Income	2146285	2096840	51.00%	-2.30%
Non-Low Income	3372800	3220435		-4.52%
Minority	1025715	1025715	0.00%	0.00%
Non-Minority	4493370	4291560		-4.49%
Total	5519085	5317275		-3.66%

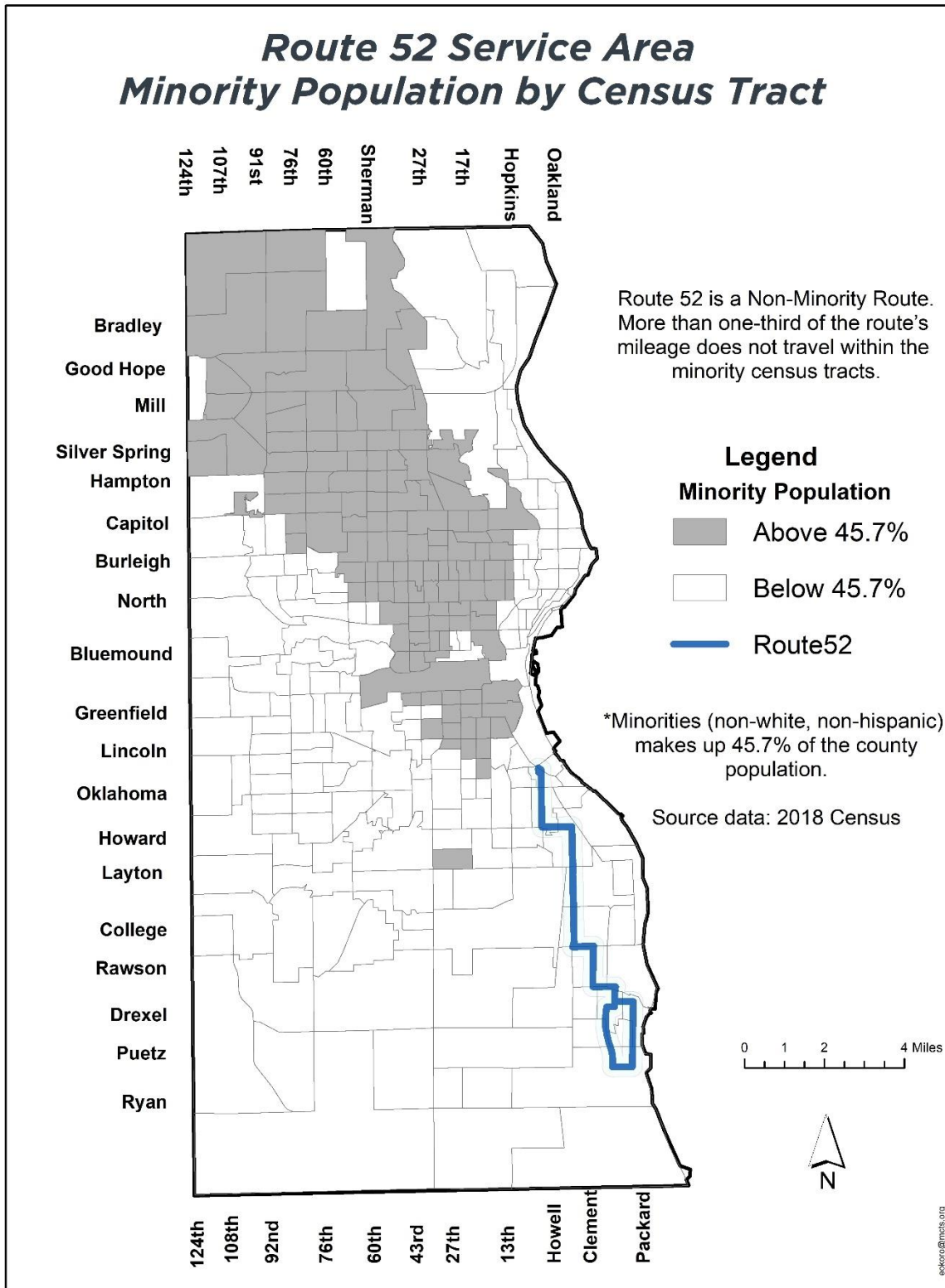


## MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS

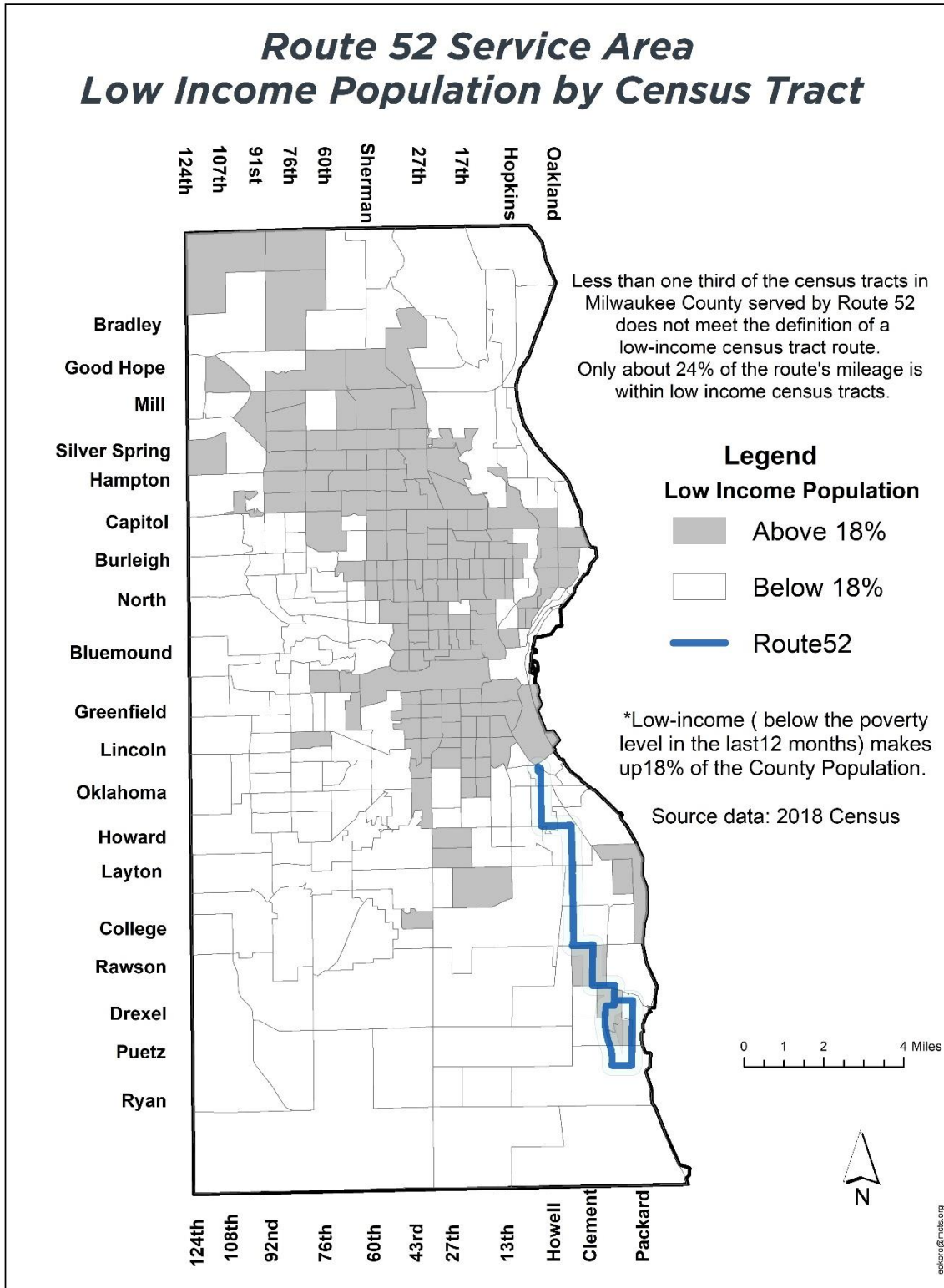
No mitigation efforts are needed, however, MCTS is taking steps to ensure that most segments of the route south of College Ave previously served by Route 52 are still being served by a modification of Route 15.

## SUMMARY

- MCTS' operating budget has been reduced significantly in recent years.
- MCTS has identified several low productivity routes to balance the operating budget. One of those modifications is to Route 52 service on the segment south of College Ave with very low productivity.
- The reconfiguration of this service meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur.
- Route 52 is not considered a minority and low-income route, so the segment eliminations will not be considered to have any disparate impact and a disproportionate burden on the minority and low-income population, respectively.
- To help mitigate any impacts to current riders, Route 15 will be modified to serve the former portion of Route 52's more heavily used segment.
- The southern end of the reconfigured Route 52 will terminate further east on College Ave to provide direct service to Kelly Senior Center, east of Lake Dr.



(Map 2.)



Created by: MCTS Service Development Department - 11/9/2022

(Map 3.)

**Milwaukee County Transit System  
Interoffice Memorandum**

TO: File

FROM: Jesus Ochoa, Planning Manager  
Service Development Department

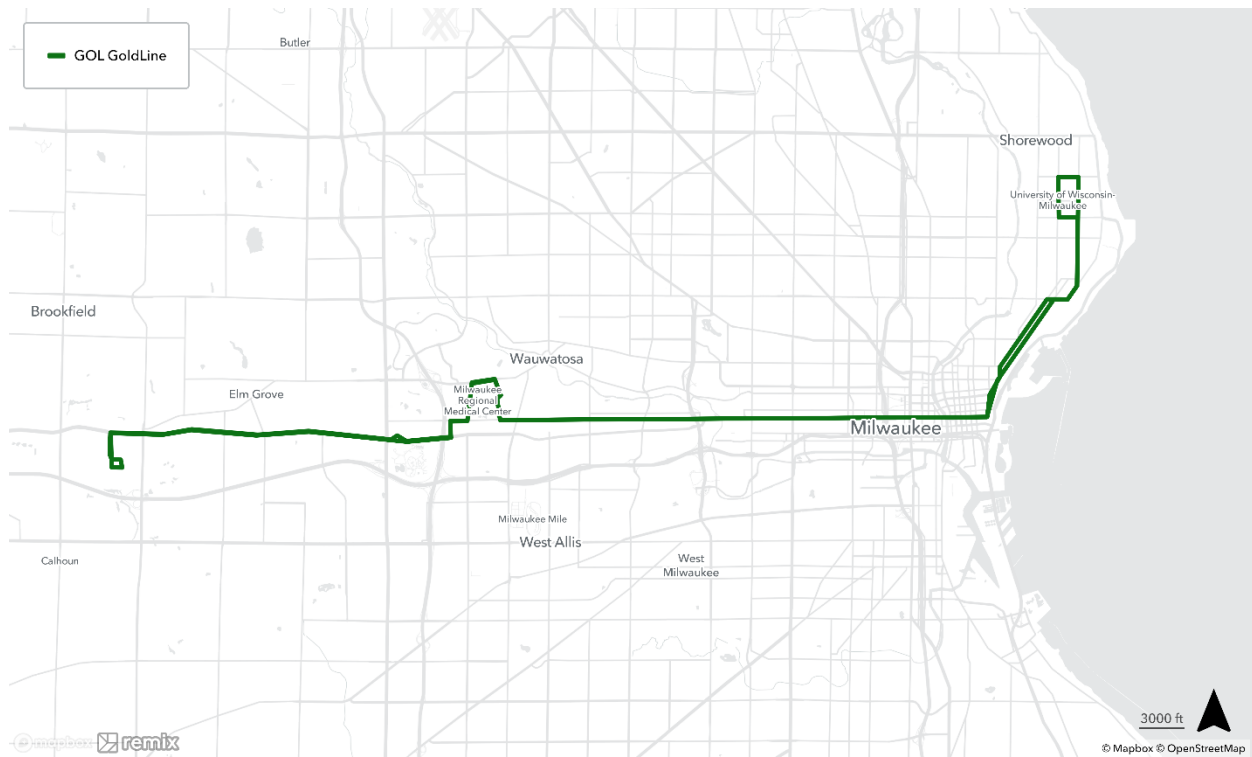
SUBJECT: SAFE Analysis – Elimination of GoldLine

DATE: December 24, 2022

The elimination of GoldLine service meets the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity Analysis (SAFE). The SAFE indicated whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

**BACKGROUND**

GoldLine (see Map 1) was created to serve residents and businesses in the Cities of Milwaukee, Wauwatosa, Elm Grove, and Brookfield. It operates on major streets such as Downer Ave, Farewell/Prospect, Wisconsin Ave, and Bluemound Road. Its primary destinations are UWM, downtown Milwaukee, the Milwaukee Regional Medical Center, and Brookfield Square Mall. This route operates between 4 AM and 2 AM seven days a week, totaling approximately 155 in-service hours per weekday. The in-service hours would no longer be in-effect with the elimination of the route. In the 22-SEP pick, the route served 3,199 rides per weekday. Starting on June 4<sup>th</sup> 2023, majority of the route will be replaced with the launch of the new Connect 1 Bus Rapid Transit (BRT) route along with an extension of Waukesha Metro 1 into Milwaukee County, and the eastern most segments of GoldLine will be served by current Routes 21 and 30. Therefore, only stops in the segment of today's GoldLine on Wisconsin Avenue between 60<sup>th</sup> to 87<sup>th</sup> Street will not be directly served by a fixed route. However, this segment will still be within ¼ mile radius of a BRT station, and thus still served by transit.



(Map 1.)

### **DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN**

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to 2018 census data, the minority population (defined as everyone, not white-alone, non-Hispanic origin) of Milwaukee County is 45.7% while the low-income population (defined as people with incomes in the past 12 months below the poverty level) is 18%. The majority of both populations reside on the northwest side and near the south side of Milwaukee County (Maps 2 and 3).

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as “minority” and “non-minority” according to whether one-third of the route’s mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of the GoldLine revealed that the route does travel through minority tracts and low-income census tracts currently served by the route. Less than one-third of the route’s mileage travels through minority communities (12.6%) (Map 2). A third of the route travels through low-income tracts (34%) (Map 3). As a result, it was deduced that the elimination of

this segment would not have a disparate impact on the minority populations but would have a disparate or disproportionate impact on low-income populations.

MCTS also used GIS to analyze how this change would affect minority and low-income people's access to transit. While the elimination of any route or route segment will have a detrimental effect on everybody's access to transit service, it was determined that there is no disproportionate impact on low-income populations versus non-low-income, or on minority communities compared to non-minority communities (table 1). Therefore, no mitigation measures are required.

<b>Table 1</b>	<b>Trips Before</b>	<b>Trips After</b>	<b>4/5ths Rule</b>	
Low Income	13754970	13614690	267.69%	-1.02%
Non-Low Income	8562025	8328280		-2.73%
Minority	11176460	11548530	- 201.17%	3.33%
Non-Minority	11140535	10394440		-6.70%
Total	22316995	21942970		-1.68%

## **MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS**

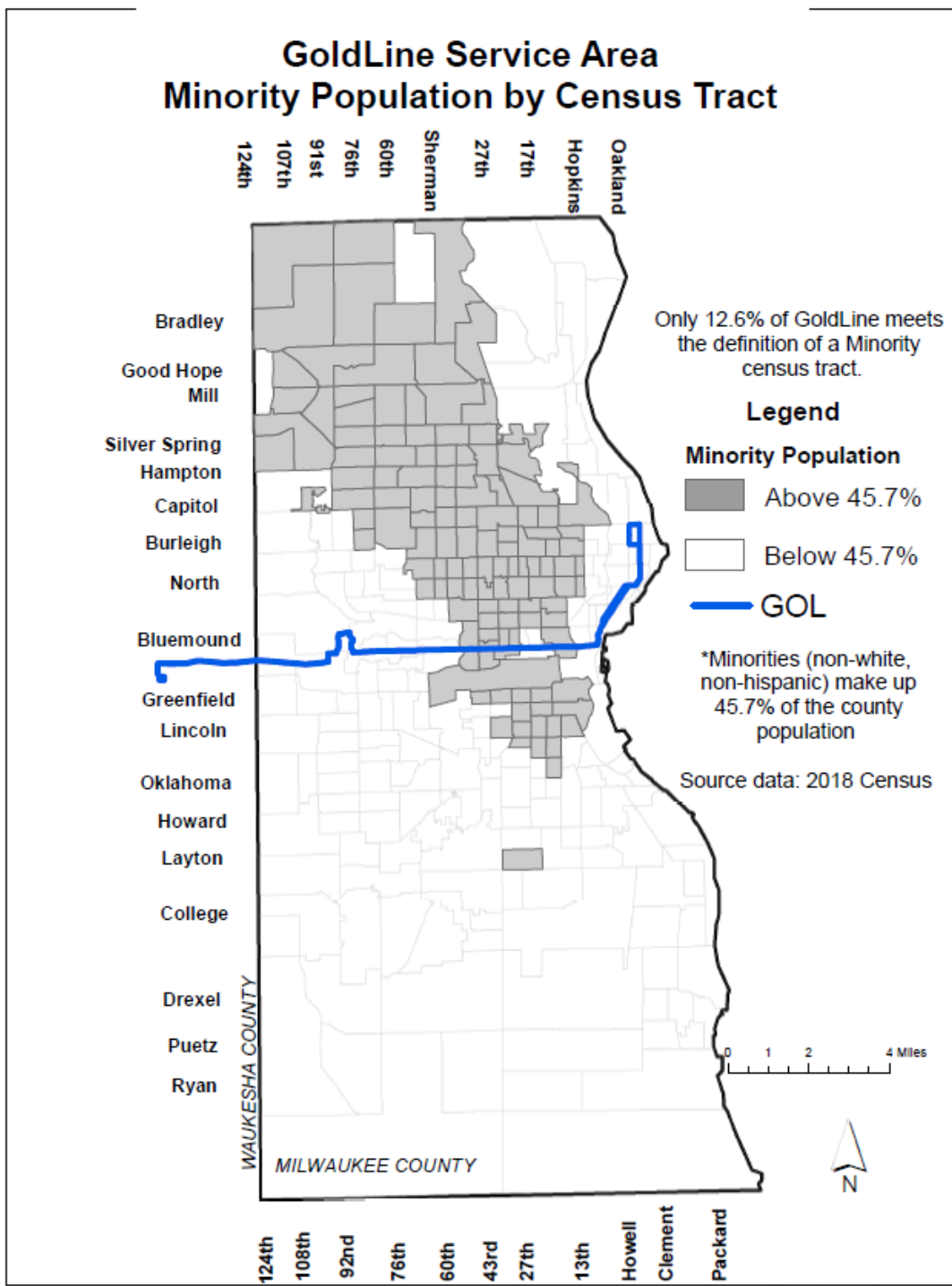
Although, by definition, no mitigation is required, MCTS understands the impact of eliminating the GoldLine on riders. With the launch of the new Bus Rapid Transit Line called the Connect 1, MCTS will also modify existing MCTS Routes 21 and 30 to serve segments previously served by the GoldLine with similar or better service. In addition, Waukesha Metro will extend its current Metro Route 1 into Milwaukee County to connect with the new BRT Line and serve segments formerly served by the GoldLine with similar services as today.

## **SUMMARY**

- The elimination of this service meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur.
- GoldLine is not considered a minority route, so the segment eliminations will not be considered to have any disparate impact and a disproportionate burden on the minority population, respectively. It is considered a low-income route, though eliminated segments, especially, on the eastside will continue to be served by a reconfigured Route 21 where a high percentage of low-income population resides.
- Though GoldLine will be eliminated, the launch of the Connect 1 BRT Line and other routes will serve major portions of the eliminated route segments with equal or more frequent service.

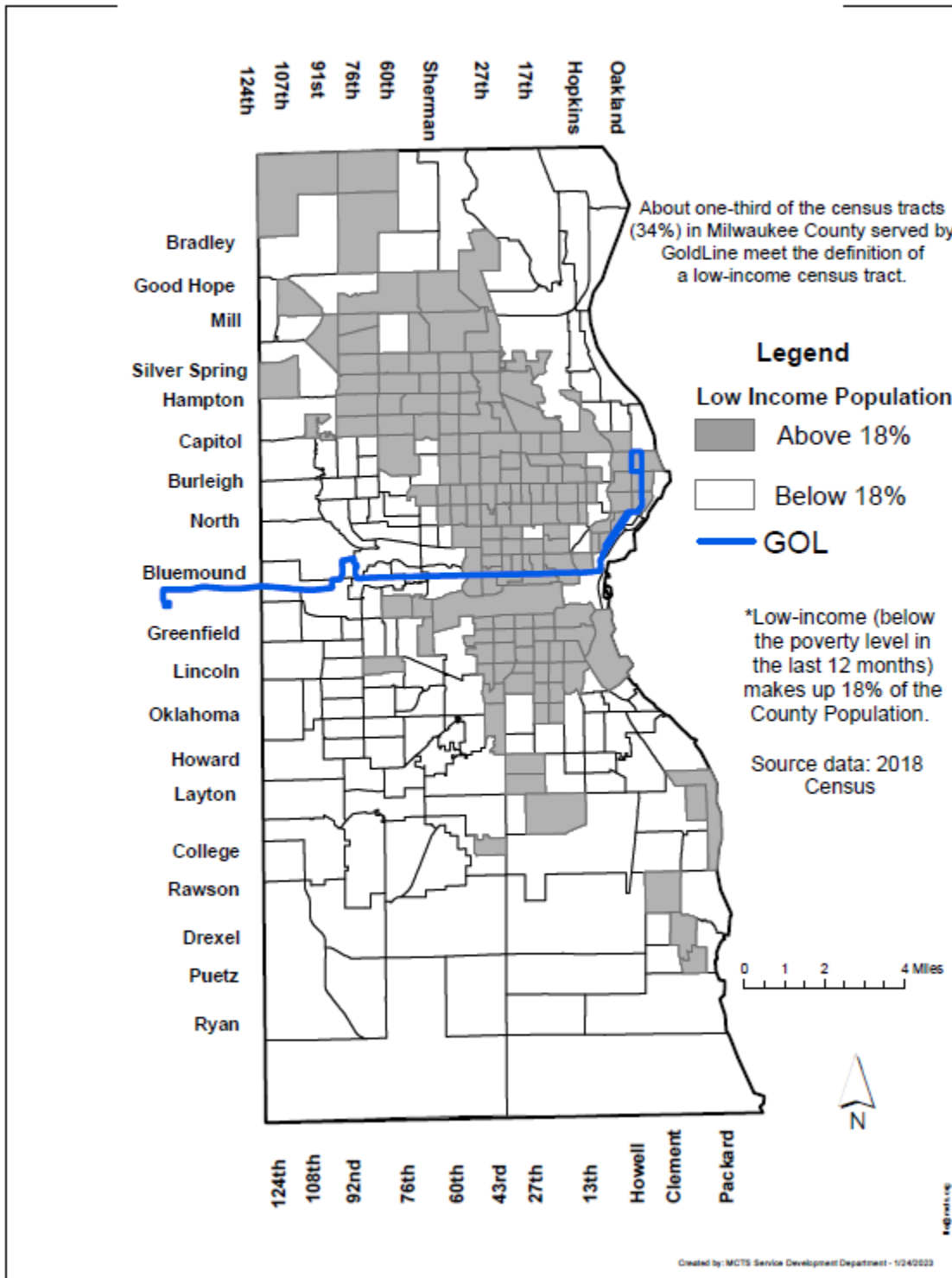
- These routes include Waukesha Metro 1 which will extend east into Milwaukee County serving the western end between Brookfield Square and the Milwaukee Medical Regional Center, Route 30 serving the eastside segments of Prospect/Farwell, and Route 21 extending to UWM on Downer year-round all currently served by GoldLine

(Map 2.)



(Map 3.)

### GoldLine Service Area Low Income Population by Census Tract







# Milwaukee County Transit System

## Title VI Service Equity Analysis

### CONNECT 1 Bus Rapid Transit



December 1, 2022

Prepared by: Tom Winter, Director of Service Development,  
Jesus Ochoa, Planning Manager  
Milwaukee, Wisconsin

## **Introduction**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Milwaukee County Transit System (MCTS) has committed to the Federal Transit Administration's (FTA) Title VI objectives set forth in Circular 4702.1B ensuring that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.

FTA Circular 4702.1B requires transit providers that implement a New Start, Small Start, or other new fixed guideway capital project conduct a service equity analysis six months prior to the beginning of revenue operations. The analysis is to be done whether or not the proposed changes rise to the level of a 'major service change' as defined by the transit provider. The service equity analysis shall include a comparative analysis of service levels pre-and post- the New Starts/Small Starts/new fixed guideway capital project. The analysis shall be depicted in tabular format and shall determine whether the service changes proposed will result in a disparate impact on minority populations or a disproportionate burden on low- income populations.

Milwaukee County applied for and was awarded funds in the FTA Small Starts CIG Program in 2021 to construct a bus rapid transit project. The project was originally known as the East – West Bus Rapid Transit project. It was later branded as CONNECT 1 Bus Rapid Transit.

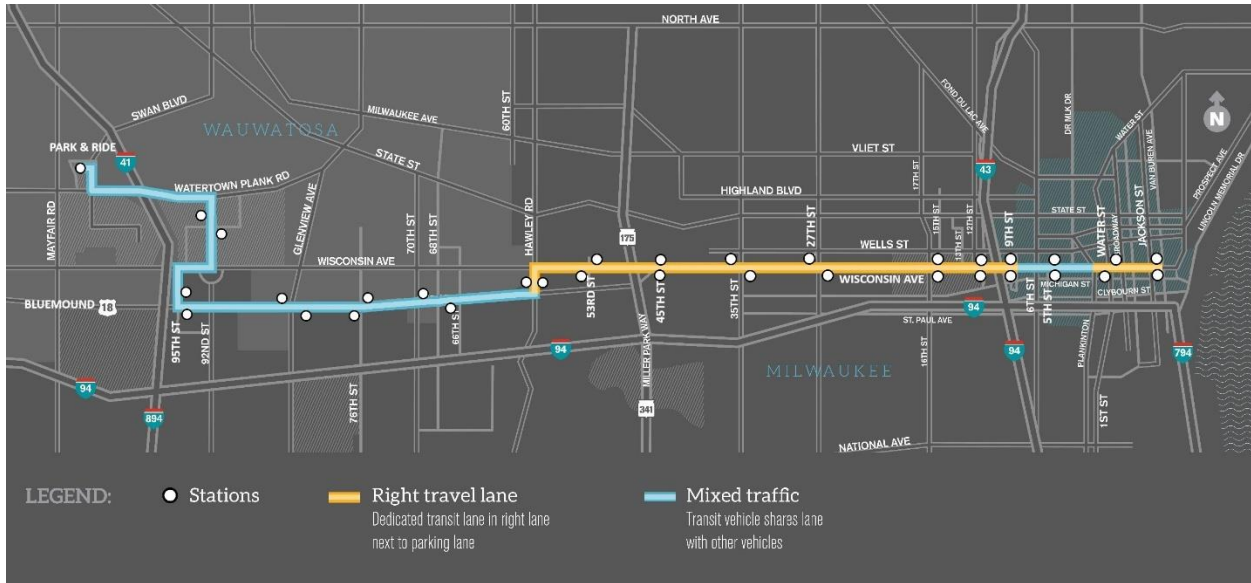
### **CONNECT 1 BUS RAPID TRANSIT**

The CONNECT 1 BRT will be a 9-mile, regional, modern transit service connecting major employment, education, and recreation destinations through downtown Milwaukee, Milwaukee's Near West Side, Marquette University, City of Wauwatosa and the Milwaukee Regional Medical Center (see Map 1). The CONNECT 1 BRT will provide improved access to the region's most vital, most traveled, and most congested corridor. Peak headways on the route are proposed at 10 minutes and include increased amenities at bus stations such as real-time signage, elevated boarding platforms, ticket vending machines and bus only-lanes. In addition, battery electric buses branded with the CONNECT logo and color will exclusively operate on the route providing reliable high-frequency transportation, cost savings, and a cleaner environment to thousands of riders annually. The CONNECT 1 will begin operation in June 2023.

### **Underlying Route Changes**

The introduction of CONNECT 1 BRT will present an opportunity for MCTS to improve the reliability of service on underlying local routes, make them easier to understand, and expand access to jobs (see Maps 2, 3, and 4). All underlying route changes are planned to maintain or improve existing frequencies and service span.

Map 1.



- GoldLine (Wisconsin - UWM)
  - CONNECT 1 BRT will provide a premium level of service along a majority of the GoldLine and thus allows the latter to be eliminated. The GoldLine name will be retired.
- Route 30 (Sherman – Wisconsin)
  - Service frequency will be increased as Route 30 will serve former GoldLine passengers between downtown and UWM.
- Route 21 (North Avenue)
  - Service will be expanded to maintain service along Downer Avenue every day all year long. Route 21 service on Downer Avenue today does not operate on weekends or during the summer.
- Waukesha Metro Route 1 (Brookfield)
  - Waukesha Metro’s Route 1 will be extended from Brookfield Square to the Milwaukee Regional Medical Center and replace a segment of the GoldLine.

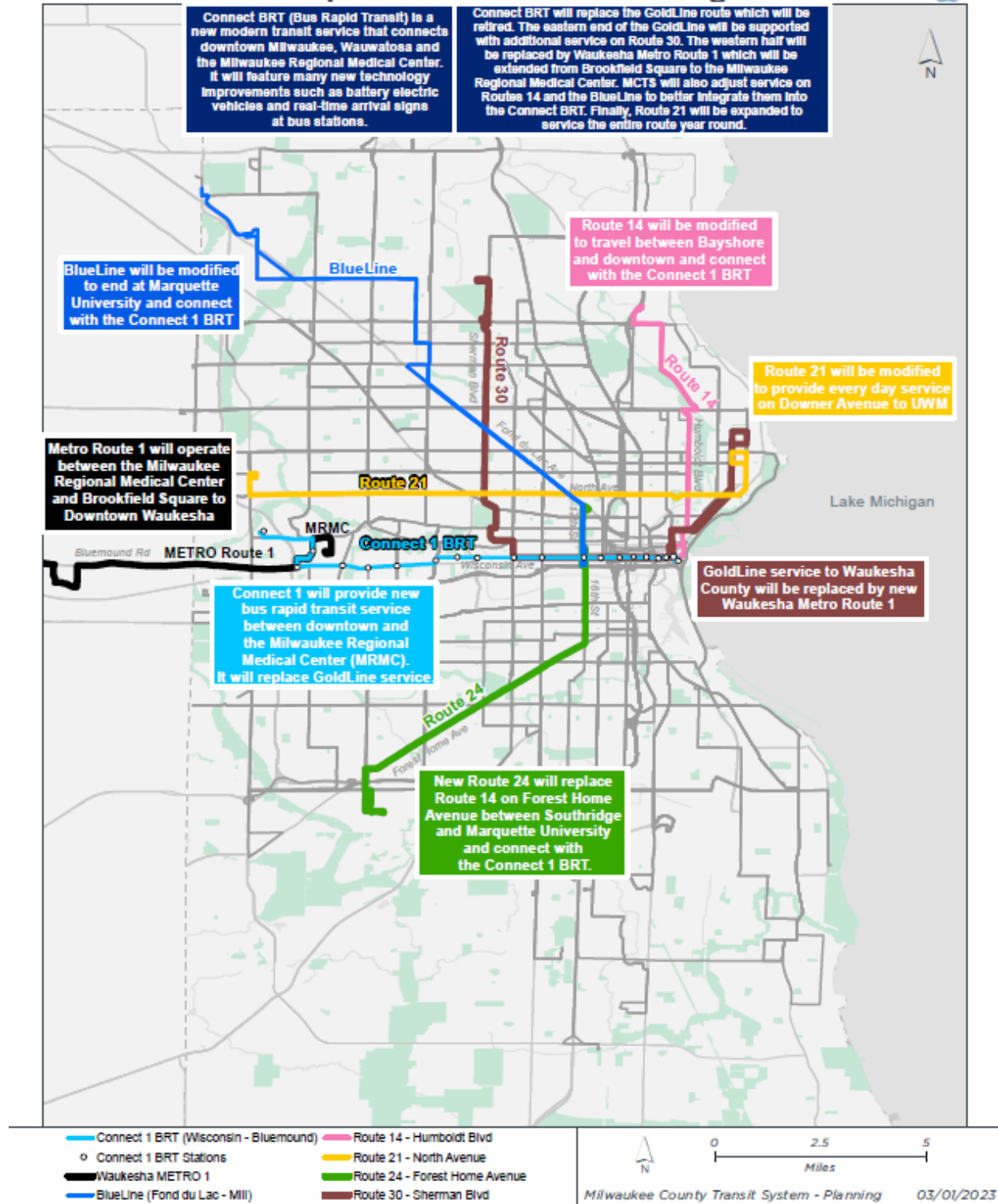
A comparative analysis of service before and after the introduction of CONNECT 1 BRT and underlying route changes shows bus frequencies will be improved in a majority of segments along the corridor (see Table 2).

Table 2.

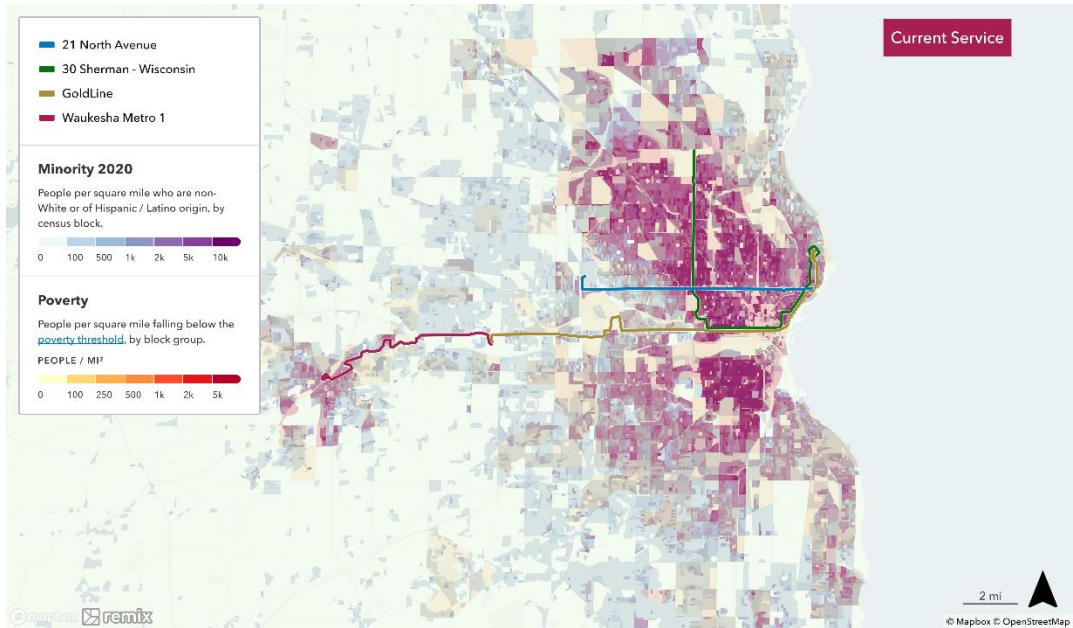
Current Route	Segment	Current Peak Headways	Proposed Peak Headways	Route Replacement
GoldLine	Wisconsin Avenue	15 minutes	5-10 minutes	CONNECT 1 BRT / Route 30
GoldLine	Prospect / Farwell	15 minutes	10 minutes	Route 30
GoldLine	Bluemound Road	15 minutes	10-15 minutes	CONNECT 1 BRT / Waukesha METRO 1
GoldLine	Downer Avenue	15 minutes	15 minutes	Route 21

Map 2.

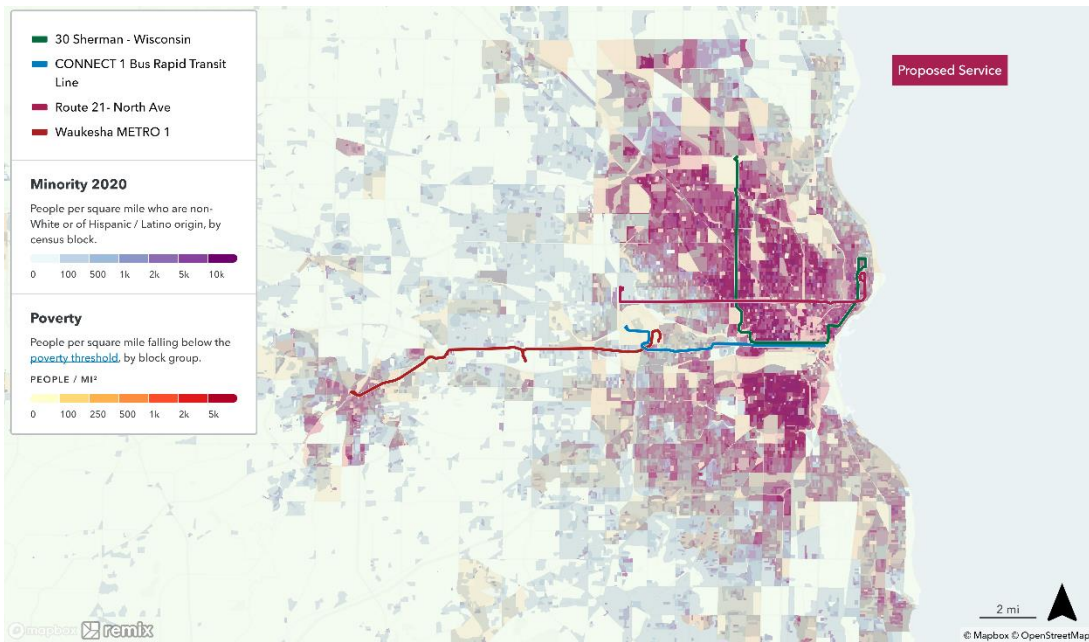
## 2023 Connect 1 BRT & Proposed Local Route Changes



Map 3. – Current Service



Map 4. – CONNECT 1 BRT and Underlying Route Changes



## Title VI Review – Service Equity Analysis

MCTS Title VI guidelines require any service change to a route (or a group of routes) be examined to determine if it meets any of the definitions of a “major service change”:

- it affects 25% of the bus hours on a route or group of routes,
- it affects 25% of the one-way mileage of a route or group of routes,
- it affects 25% of the daily service period,
- it reduces the frequency of service (increases headway) by 50%, or
- it creates a gap of greater than one-half mile from the nearest alternative service.

If a major service change is confirmed, MCTS must then prepare a service equity analysis. The service equity analysis indicates whether the change has a disparate impact on the minority population or disproportionate burden on the low-income population. If either impact exists, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

Applying these thresholds to the introduction of CONNECT 1 BRT and underlying route changes indicates they meet the definition of a major service change and requires a service equity analysis (see Table 2).

Table 2.

Threshold Measure	Cross Threshold?	Notes
Affects 25% of the bus hours?	Yes	All GoldLine hours will be affected as this route will be eliminated /retired.
Affects 25% of the one-way mileage?	Yes	All one-way mileage will be affected due to GoldLine being eliminated /retired.
Affects 25% of the daily service span?	Yes	GoldLine will no longer be in service impacting 100% of its service span.
Reduces the frequency of service by 50%?	Yes	GoldLine will no longer be in operation impacting 100% of its frequency of service.
Creates a gap > than one-half mile?	Yes	GoldLine’s elimination will create gaps greater than one-half mile in portions of Milwaukee County and Waukesha County.

The process of completing the service equity analysis involves several calculations. The first step is to measure the number of annual people trips traveling through each tract in the current system as well as after the start of CONNECT 1 BRT and underlying service changes. These data sets were evaluated for both the low-income population and for the minority population. A comparison was then made between the number of annual people trips for the low-income and non-low-income population and similarly between the minority population and the non-minority population.

The next step in the process was to compare the percent change in annual people trips for each pair of population groups, i.e., minority to non-minority and low income to non-low income. If the difference in percent change is less than 80% (known as the Four-Fifths rule), then the impact on the minority or low-income groups would be considered disparate and disproportionate, respectively. If the difference in percent change was higher than 80%, then the impacts would not be considered disparate or disproportionate.

A review of the data indicates the percent changes would be higher than 80% (see Table 3). As such, the changes would not have a disparate impact on the minority population nor a disproportionate burden on the low-income population.

Table 3.

Population Group	Annual People Trips Before	Annual People Trips After	Percent Change	4/5ths Rule (< 80%)?	Disp. Burden? / Disp. Impact?
Low Income Population	13,754,970	13,614,690	-1.2%	267%	No
Non-Low Income Population	8,562,025	8,328,280	-2.7%		
Minority Population	11,176,460	11,548,530	3.3%	201%	No
Non-Minority Population	11,140,535	10,394,440	-6.7%		

A "People Trip" is defined as the total population served by a route (or group of routes) multiplied by the annual scheduled trips on that route (or group of routes)

#### SUMMARY

- FTA Circular 4702.1B requires transit providers that implement a New Start, Small Start, or other new fixed guideway capital project conduct a service equity analysis of the proposed changes.
- Milwaukee County applied for funds in the FTA Small Starts CIG Program in 2021 to operate a bus rapid transit project. The project was originally known as the East – West Bus Rapid Transit project. It was later branded as CONNECT 1 Bus Rapid Transit.
- The introduction of CONNECT 1 BRT and underlying route changes will meet the threshold of a major service change and requires a service equity analysis to determine if a disparate impact or disproportionate burden would occur.
- MCTS will implement other service changes along with CONNECT 1 BRT:
  - Route 30 (Sherman – Wisconsin) will replace a former segment of the GoldLine between downtown and UWM. Additional service will be added to the route to serve riders.
  - Route 21 (North Avenue) service between North Avenue and UWM will be expanded to operate every day year-round and replace a segment of the GoldLine.
  - Waukesha Metro 1 will be extended east from Brookfield Square to the Milwaukee Medical Regional Center and replace a segment of the GoldLine.
- The service equity analysis determined these service changes would not have a disparate impact on the minority population nor a disproportionate burden on the low-income population.

Milwaukee County Population and Race Distribution Chart 2021

Census Tract	2021 Population	White		Black		American Indian and Alaska Native		Asian		Native Hawaiian and Other Pacific Islander		Other		Two or More Races		Hispanic or Latino		Total Minority	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
		1.01	4696	831	17.7%	3471	73.9%	0	0.0%	145	3.1%	0	0.0%	0	0.0%	171	3.6%	78	1.7%
1.02	3263	712	21.8%	2160	66.2%	0	0.0%	23	0.7%	0	0.0%	0	0.0%	107	3.3%	261	8.0%	2551	78.2%
2.01	5162	517	10.0%	3796	73.5%	0	0.0%	465	9.0%	0	0.0%	0	0.0%	44	0.9%	340	6.6%	4645	90.0%
2.02	6790	1830	27.0%	3918	57.7%	53	0.8%	574	8.5%	0	0.0%	0	0.0%	265	3.9%	150	2.2%	4960	73.0%
3.01	1342	1051	78.3%	58	4.3%	2	0.1%	127	9.5%	0	0.0%	0	0.0%	43	3.2%	61	4.5%	291	21.7%
3.02	2952	258	8.7%	2302	78.0%	0	0.0%	68	2.3%	0	0.0%	0	0.0%	89	3.0%	235	8.0%	2694	91.3%
3.03	1853	684	36.9%	934	50.4%	12	0.6%	25	1.3%	0	0.0%	0	0.0%	113	6.1%	85	4.6%	1169	63.1%
3.04	3413	862	25.3%	2113	61.9%	0	0.0%	203	5.9%	0	0.0%	0	0.0%	91	2.7%	144	4.2%	2551	74.7%
4	2617	1181	45.1%	1039	39.7%	0	0.0%	104	4.0%	0	0.0%	0	0.0%	146	5.6%	147	5.6%	1436	54.9%
5.01	3907	1239	31.7%	1769	45.3%	107	2.7%	61	1.6%	0	0.0%	0	0.0%	305	7.8%	426	10.9%	2668	68.3%
5.02	4969	444	8.9%	3656	73.6%	0	0.0%	370	7.4%	0	0.0%	0	0.0%	251	5.1%	248	5.0%	4525	91.1%
6	6590	1461	22.2%	3903	59.2%	5	0.1%	766	11.6%	0	0.0%	0	0.0%	117	1.8%	338	5.1%	5129	77.8%
7	3792	940	24.8%	2505	66.1%	0	0.0%	161	4.2%	0	0.0%	0	0.0%	36	0.9%	150	4.0%	2852	75.2%
8	5455	987	18.1%	3554	65.2%	0	0.0%	394	7.2%	0	0.0%	0	0.0%	271	5.0%	249	4.6%	4468	81.9%
9	4462	434	9.7%	3289	73.7%	0	0.0%	225	5.0%	0	0.0%	0	0.0%	313	7.0%	201	4.5%	4028	90.3%
10	3782	536	14.2%	3145	83.2%	1	0.0%	0	0.0%	0	0.0%	0	0.0%	81	2.1%	19	0.5%	3246	85.8%
11	2113	250	11.8%	1761	83.3%	0	0.0%	58	2.7%	0	0.0%	0	0.0%	17	0.8%	27	1.3%	1863	88.2%
12	3381	161	4.8%	2249	66.5%	0	0.0%	755	22.3%	0	0.0%	0	0.0%	128	3.8%	88	2.6%	3220	95.2%
13	4002	389	9.7%	2543	63.5%	0	0.0%	449	11.2%	0	0.0%	0	0.0%	126	3.1%	495	12.4%	3613	90.3%
14	2801	321	11.5%	1753	62.6%	0	0.0%	676	24.1%	0	0.0%	0	0.0%	26	0.9%	25	0.9%	2480	88.5%
15	3136	364	11.6%	1756	56.0%	0	0.0%	657	21.0%	0	0.0%	0	0.0%	88	2.8%	271	8.6%	2772	88.4%
16	2979	154	5.2%	2441	81.9%	31	1.0%	0	0.0%	153	5.1%	0	0.0%	7	0.2%	193	6.5%	2825	94.8%
17	4958	853	17.2%	3426	69.1%	15	0.3%	252	5.1%	0	0.0%	0	0.0%	399	8.0%	13	0.3%	4105	82.8%
18	2512	265	10.5%	1834	73.0%	85	3.4%	38	1.5%	0	0.0%	0	0.0%	0	0.0%	290	11.5%	2247	89.5%
19	3346	231	6.9%	2973	88.9%	0	0.0%	106	3.2%	0	0.0%	0	0.0%	25	0.7%	11	0.3%	3115	93.1%
20	2738	374	13.7%	2123	77.5%	0	0.0%	60	2.2%	0	0.0%	26	0.9%	34	1.2%	121	4.4%	2364	86.3%
21	1863	87	4.7%	1608	86.3%	0	0.0%	18	1.0%	0	0.0%	20	1.1%	47	2.5%	83	4.5%	1776	95.3%
22	2060	621	30.1%	1256	61.0%	9	0.4%	0	0.0%	0	0.0%	0	0.0%	22	1.1%	152	7.4%	1439	69.9%
23	4623	106	2.3%	4327	93.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	69	1.5%	121	2.6%	4517	97.7%
24	2444	192	7.9%	2050	83.9%	0	0.0%	54	2.2%	0	0.0%	0	0.0%	2	0.1%	146	6.0%	2252	92.1%
25	2418	117	4.8%	1970	81.5%	23	1.0%	0	0.0%	0	0.0%	0	0.0%	93	3.8%	215	8.9%	2301	95.2%
26	2744	131	4.8%	2183	79.6%	37	1.3%	0	0.0%	0	0.0%	0	0.0%	45	1.6%	348	12.7%	2613	95.2%
27	1992	199	10.0%	1561	78.4%	12	0.6%	51	2.6%	0	0.0%	3	0.2%	157	7.9%	9	0.5%	1793	90.0%
28	2341	169	7.2%	1976	84.4%	14	0.6%	13	0.6%	0	0.0%	0	0.0%	23	1.0%	146	6.2%	2172	92.8%
29	2595	240	9.2%	1793	69.1%	9	0.3%	0	0.0%	0	0.0%	0	0.0%	356	13.7%	197	7.6%	2355	90.8%
30	4278	281	6.6%	3088	72.2%	0	0.0%	105	2.5%	0	0.0%	8	0.2%	85	2.0%	711	16.6%	3997	93.4%
31	3934	255	6.5%	2872	73.0%	6	0.2%	401	10.2%	0	0.0%	0	0.0%	218	5.5%	182	4.6%	3679	93.5%
32	2772	403	14.5%	1740	62.8%	11	0.4%	472	17.0%	13	0.5%	0	0.0%	29	1.0%	104	3.8%	2369	85.5%
33	5190	557	10.7%	3931	75.7%	0	0.0%	373	7.2%	0	0.0%	21	0.4%	164	3.2%	144	2.8%	4633	89.3%
34	6020	1403	23.3%	3674	61.0%	87	1.4%	99	1.6%	0	0.0%	0	0.0%	370	6.1%	387	6.4%	4617	76.7%
35	3235	214	6.6%	2690	83.2%	0	0.0%	190	5.9%	0	0.0%	0	0.0%	36	1.1%	105	3.2%	3021	93.4%
36	1492	146	9.8%	1100	73.7%	73	4.9%	0	0.0%	4	0.3%	0	0.0%	31	2.1%	138	9.2%	1346	90.2%
37	2194	337	15.4%	1707	77.8%	2	0.1%	40	1.8%	0	0.0%	7	0.3%	42	1.9%	59	2.7%	1857	84.6%
38	2540	136	5.4%	2341	93.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	10	0.4%	13	0.5%	2404	94.6%
39	2648	196	7.4%	2345	88.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	52	2.0%	55	2.1%	2452	92.6%
40	2392	84	3.5%	1985	83.0%	0	0.0%	275	11.5%	0	0.0%	0	0.0%	21	0.9%	27	1.1%	2308	96.5%
41	2915	117	4.0%	2228	76.4%	0	0.0%	0	0.0%	10	0.3%	0	0.0%	16	0.5%	544	18.7%	2798	96.0%
42	3190	201	6.3%	2822	88.5%	0	0.0%	2	0.1%	0	0.0%	34	1.1%	33	1.0%	98	3.1%	2989	93.7%
43	4833	216	4.5%	4180	86.5%	0	0.0%	27	0.6%	0	0.0%	67	1.4%	284	5.9%	59	1.2%	4617	95.5%
44	2466	641	26.0%	1531	62.1%	0	0.0%	24	1.0%	0	0.0%	33	1.3%	23	0.9%	214	8.7%	1825	74.0%
45	1915	11	0.6%	1595	83.3%	0	0.0%	1	0.1%	0	0.0%	14	0.7%	158	8.3%	136	7.1%	1904	99.4%
46	2929	92	3.1%	2776	94.8%	12	0.4%	0	0.0%	0	0.0%	7	0.2%	0	0.0%	42	1.4%	2837	96.9%
47	3633	11	0.3%	3522	96.9%	1	0.0%	0	0.0%	0	0.0%	51	1.4%	48	1.3%	0	0.0%	3622	99.7%
48	3863	90	2.3%	3502	90.7%	4	0.1%	57	1.5%	0	0.0%	0	0.0%	10	0.3%	200	5.2%	3773	97.7%
49	4025	385	9.6%	3283	81.6%	0	0.0%	21	0.5%	0	0.0%	18	0.4%	21	0.5%	297	7.4%	3640	90.4%
50	5110	1095	21.4%	3308	64.7%	0	0.0%	66	1.3%	0	0.0%	0	0.0%	100	2.0%	541	10.6%	4015	78.6%
51	3040	338	11.1%	2621	86.2%	0	0.0%	19	0.6%	0	0.0%	0	0.0%	13	0.4%	49	1.6%	2702	88.9%
52	1540	661	42.9%	696	45.2%	16	1.0%	6	0.4%	0	0.0%	24	1.6%	29	1.9%	108	7.0%	879	57.1%
53	2014	818	40.6%	899	44.6%	0	0.0%	23	1.1%	0	0.0%	0	0.0%	183	9.1%	91	4.5%	1196	59.4%
54	2903	1917	66.0%	671	23.1%	6	0.2%	59	2.0%	0	0.0%	0	0.0%	87	3.0%	163	5.6%	986	34.0%
55	3093	2006	64.9%	553	17.9%	0	0.0%	93	3.0%	4	0.1%	15	0.5%	202	6.5%	220	7.1%	1087	35.1%
56	2073	1608	77.6%	61	2.9%	0	0.0%	16	0.8%	0	0.0%	12	0.6%	159	7.7%	217	10.5%	465	22.4%
57	2268	1440	63.5%	460	20.3%	9	0.4%	0	0.0%	0	0.0%	0	0.0%	162	7.1%	197	8.7%	828	36.5%
58	3537	2135	60.4%	1041	29.4%	0	0.0%	53	1.5%	0	0.0%	0	0.0%	81	2.3%	227	6.4%	1402	39.6%
59	4012	700	17.4%	2758	68.7%	0	0.0%	74	1.8%	0	0.0%	0	0.0%	150	3.7%	330	8.2%	3312	82.6%



84	603	15	2.5%	453	75.1%	0	0.0%	0	0.0%	0	0.0%	17	2.8%	75	12.4%	43	7.1%	588	97.5%
85	1354	31	2.3%	1309	96.7%	4	0.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	10	0.7%	1323	97.7%
86	796	38	4.8%	710	89.2%	0	0.0%	0	0.0%	0	0.0%	32	4.0%	16	2.0%	758	95.2%		
87	864	0	0.0%	856	99.1%	0	0.0%	0	0.0%	0	0.0%	8	0.9%	0	0.0%	864	100.0%		
88	1674	84	5.0%	1530	91.4%	0	0.0%	0	0.0%	0	0.0%	60	3.6%	0	0.0%	1590	95.0%		
89	1477	19	1.3%	1097	74.3%	0	0.0%	164	11.1%	0	0.0%	17	1.2%	180	12.2%	1458	98.7%		
90	1959	53	2.7%	1774	90.6%	0	0.0%	91	4.6%	0	0.0%	30	1.5%	11	0.6%	1906	97.3%		
91	1814	119	6.6%	1468	80.9%	0	0.0%	218	12.0%	0	0.0%	9	0.5%	0	0.0%	1695	93.4%		
92	1477	401	27.1%	778	52.7%	10	0.7%	116	7.9%	0	0.0%	76	5.1%	96	6.5%	1076	72.9%		
93	2545	1210	47.5%	897	35.2%	22	0.9%	60	2.4%	0	0.0%	238	9.4%	118	4.6%	1335	52.5%		
94	2456	1609	65.5%	409	16.7%	0	0.0%	0	0.0%	7	0.3%	0	0.0%	18	0.7%	413	16.8%	847	34.5%
95	2122	1538	72.5%	376	17.7%	0	0.0%	1	0.0%	0	0.0%	50	2.4%	157	7.4%	584	27.5%		
96	1810	53	2.9%	1238	68.4%	0	0.0%	265	14.6%	0	0.0%	90	5.0%	164	9.1%	1757	97.1%		
97	1279	35	2.7%	270	21.1%	0	0.0%	787	61.5%	0	0.0%	175	13.7%	12	0.9%	1244	97.3%		
98	1732	3	0.2%	807	46.6%	0	0.0%	698	40.3%	0	0.0%	169	9.8%	55	3.2%	1729	99.8%		
99	1133	17	1.5%	947	83.6%	6	0.5%	0	0.0%	0	0.0%	10	0.9%	153	13.5%	1116	98.5%		
106	1175	508	43.2%	367	31.2%	0	0.0%	24	2.0%	0	0.0%	131	11.1%	145	12.3%	667	56.8%		
107	2275	1495	65.7%	274	12.0%	0	0.0%	80	3.5%	0	0.0%	76	3.3%	350	15.4%	780	34.3%		
108	2580	1740	67.4%	281	10.9%	0	0.0%	115	4.5%	0	0.0%	148	5.7%	123	4.8%	173	6.7%	840	32.6%
110	2854	2013	70.5%	411	14.4%	0	0.0%	85	3.0%	0	0.0%	11	0.4%	231	8.1%	103	3.6%	841	29.5%
111	1368	1053	77.0%	136	9.9%	0	0.0%	50	3.7%	0	0.0%	17	1.2%	112	8.2%	315	23.0%		
112	2387	1782	74.7%	147	6.2%	0	0.0%	128	5.4%	0	0.0%	40	1.7%	94	3.9%	196	8.2%	605	25.3%
113	2656	1971	74.2%	403	15.2%	8	0.3%	165	6.2%	0	0.0%	33	1.2%	76	2.9%	685	25.8%		
114	1494	996	66.7%	392	26.2%	0	0.0%	42	2.8%	0	0.0%	18	1.2%	46	3.1%	498	33.3%		
122	1972	239	12.1%	821	41.6%	0	0.0%	697	35.3%	0	0.0%	39	2.0%	89	4.5%	87	4.4%	1733	87.9%
123	1115	200	17.9%	793	71.1%	0	0.0%	4	0.4%	0	0.0%	17	1.5%	101	9.1%	915	82.1%		
124	2455	1521	62.0%	506	20.6%	0	0.0%	36	1.5%	0	0.0%	73	3.0%	319	13.0%	934	38.0%		
125	2008	1514	75.4%	182	9.1%	16	0.8%	84	4.2%	0	0.0%	72	3.6%	140	7.0%	494	24.6%		
126	2214	1575	71.1%	345	15.6%	0	0.0%	8	0.4%	0	0.0%	111	5.0%	175	7.9%	639	28.9%		
127	1223	1003	82.0%	29	2.4%	0	0.0%	44	3.6%	0	0.0%	5	0.4%	83	6.8%	59	4.8%	220	18.0%
128	3217	2341	72.8%	310	9.6%	0	0.0%	179	5.6%	0	0.0%	18	0.6%	202	6.3%	167	5.2%	876	27.2%
129	2887	2013	69.7%	224	7.8%	42	1.5%	8	0.3%	0	0.0%	101	3.5%	499	17.3%	874	30.3%		
130	1801	1017	56.5%	116	6.4%	0	0.0%	59	3.3%	0	0.0%	20	1.1%	127	7.1%	462	25.7%	784	43.5%
133	849	348	41.0%	320	37.7%	7	0.8%	28	3.3%	0	0.0%	0	0.0%	49	5.8%	97	11.4%	501	59.0%
134	2315	122	5.3%	1108	47.9%	0	0.0%	425	18.4%	0	0.0%	0	0.0%	117	5.1%	543	23.5%	2193	94.7%
135	1906	368	19.3%	1051	55.1%	9	0.5%	0	0.0%	0	0.0%	192	10.1%	286	15.0%	1538	80.7%		
136	1887	354	18.8%	1218	64.5%	0	0.0%	20	1.1%	0	0.0%	101	5.4%	41	2.2%	153	8.1%	1533	81.2%
137	1379	103	7.5%	1036	75.1%	0	0.0%	27	2.0%	0	0.0%	11	0.8%	76	5.5%	126	9.1%	1276	92.5%
141	1496	200	13.4%	1140	76.2%	0	0.0%	4	0.3%	0	0.0%	31	2.1%	121	8.1%	1296	86.6%		
143	2243	1870	83.4%	105	4.7%	22	1.0%	119	5.3%	0	0.0%	39	1.7%	88	3.9%	373	16.6%		
144	3025	2048	67.7%	282	9.3%	103	3.4%	324	10.7%	0	0.0%	6	0.2%	40	1.3%	222	7.3%	977	32.3%
146	3199	2071	64.7%	407	12.7%	13	0.4%	299	9.3%	0	0.0%	2	0.1%	30	0.9%	377	11.8%	1128	35.3%
147	2380	1436	60.3%	360	15.1%	4	0.2%	227	9.5%	0	0.0%	0	0.0%	86	3.6%	267	11.2%	944	39.7%
148	2382	817	34.3%	887	37.2%	44	1.8%	227	9.5%	0	0.0%	153	6.4%	254	10.7%	1565	65.7%		
149	1032	274	26.6%	369	35.8%	0	0.0%	93	9.0%	0	0.0%	0	0.0%	59	5.7%	237	23.0%	758	73.4%
157	3011	233	7.7%	268	8.9%	30	1.0%	0	0.0%	0	0.0%	26	0.9%	2454	81.5%	2778	92.3%		
158	2478	320	12.9%	221	8.9%	8	0.3%	43	1.7%	0	0.0%	0	0.0%	0	0.0%	1886	76.1%	2158	87.1%
159	3158	778	24.6%	268	8.5%	55	1.7%	40	1.3%	0	0.0%	14	0.4%	2003	63.4%	2380	75.4%		
160	2971	383	12.9%	371	12.5%	43	1.4%	26	0.9%	0	0.0%	100	3.4%	2048	68.9%	2588	87.1%		
161	3666	615	16.8%	271	7.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2780	75.8%	3051	83.2%
162	4036	1036	25.7%	205	5.1%	20	0.5%	3	0.1%	0	0.0%	0	0.0%	40	1.0%	2732	67.7%	3000	74.3%
163	4433	336	7.6%	433	9.8%	0	0.0%	91	2.1%	0	0.0%	22	0.5%	14	0.3%	3537	79.8%	4097	92.4%
164	3907	373	9.5%	167	4.3%	69	1.8%	18	0.5%	0	0.0%	31	0.8%	22	0.6%	3227	82.6%	3534	90.5%
165	2372	377	15.9%	301	12.7%	4	0.2%	0	0.0%	0	0.0%	44	1.9%	1646	69.4%	1995	84.1%		
166	1916	279	14.6%	491	25.6%	21	1.1%	7	0.4%	0	0.0%	12	0.6%	195	10.2%	911	47.5%	1637	85.4%
167	3320	486	14.6%	484	14.6%	68	2.0%	398	12.0%	0	0.0%	0	0.0%	0	0.0%	1884	56.7%	2834	85.4%
168	3055	237	7.8%	253	8.3%	0	0.0%	68	2.2%	0	0.0%	36	1.2%	2461	80.6%	2818	92.2%		
169	3700	391	10.6%	89	2.4%	69	1.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	3151	85.2%	3309	89.4%
170	4484	1062	23.7%	159	3.5%	39	0.9%	24	0.5%	0	0.0%	131	2.9%	3069	68.4%	3422	76.3%		
171	2874	466	16.2%	8	0.3%	6	0.2%	76	2.6%	0	0.0%	11	0.4%	29	1.0%	2278	79.3%	2408	83.8%
172	2718	200	7.4%	61	2.2%	15	0.6%	149	5.5%	0	0.0%	0	0.0%	0	0.0%	2293	84.4%	2518	92.6%
173	4226	774	18.3%	0	0.0%	99	2.3%	119	2.8%	0	0.0%	19	0.4%	41	1.0%	3174	75.1%	3452	81.7%
174	2730	317	11.6%	179	6.6%	0	0.0%	282	10.3%	5	0.2%	47	1.7%	1900	69.6%	2413	88.4%		
175	3675	322	8.8%	246	6.7%	26	0.7%	252	6.9%	0	0.0%	10	0.3%	2819	76.7%	3353	91.2%		
176	2878	404	14.0%	163	5.7%	55	1.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2256	78.4%	2474	86.0%
179	3073	2313	75.3%	190	6.2%	6	0.2%	12	0.4%	0	0.0%	123	4.0%	429	14.0%	760	24.7%		
180	2896	2115	73.0%	70	2.4%	0	0.0%	158	5.5%	0	0.0%	59	2.0%	494	17.1%	781	27.0%		
181	1949	1668	85.6%	111	5.7%	0	0.0%	11	0.6%	0	0.0%	15	0.8%	144	7.4%	281	14.4%		
182	1524	1445	94.8%	0	0.0%	0	0.0%	4	0.3%	0	0.0%	15	1.0%	60	3.9%	79	5.2%		
183	2331	1918	82.3%	32	1.4%	35	1.5%	0	0.0%	0	0.0%	23	1.0%	71	3.0%	252	10.8%	413	17.7%
184	1333	1020	76.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	18	1.4%	295	22.1%	313	23.5%		
185	1833	1286	70.2%	19	1.0%	0	0.0%	0	0.0%	0	0.0%	150	8.2%	17	0.9%	361	19.7%	547	29.8%
186	3039	495	16.3%	34	1.1%	0	0.0%	142	4.7%	0	0.0%	15	0.5%	2353	77.4%	2544	83.7%		
187	3353	279	8.3%	37	1.1%	27	0.8%	163	4.9%	0	0.0%	13	0.4%	2834	84.5%	3074	91.7%		
188	1533	228	14.9%	53	3.5%	15	1.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1237	80.7%	1305	85.1%
189	1519	296	19.5%	96	6.3%	0	0.0%	16	1.1%	0	0.0%	25	1.6%	1086	71.5%	1223	80.5%		
190	4512	2156	47.8%	305	6.8%	0	0.0%	145	3.2%	0	0.0%	153	3.4%	1753	38.9%	2356	52.2%		
191	3789	1622	42.8%	404	10.7%	3	0.1%	24	0.6%	0	0.0%	134	3.5%	1602	42.3%	2167	57.2%		
192	3097	1861	60.1%	217	7.0%	13	0.4%	45	1.5%	0	0.0%	101	3.3%	860	27.8%	1236	39.9%		
193	3091	1564	50.6%	21	0.7%	11	0.4%	355	11.5%	0	0.0%	107	3.5%	1033	33.4%	1			

208	3095	2757	89.1%	1	0.0%	8	0.3%	32	1.0%	0	0.0%	0	0.0%	33	1.1%	264	8.5%	338	10.9%
209	2537	1878	74.0%	121	4.8%	22	0.9%	26	1.0%	0	0.0%	33	1.3%	52	2.0%	405	16.0%	659	26.0%
210	2306	1576	68.3%	143	6.2%	9	0.4%	97	4.2%	0	0.0%	0	0.0%	92	4.0%	389	16.9%	730	31.7%
211	1412	1163	82.4%	7	0.5%	3	0.2%	0	0.0%	0	0.0%	0	0.0%	24	1.7%	215	15.2%	249	17.6%
212	1980	1328	67.1%	23	1.2%	14	0.7%	66	3.3%	0	0.0%	0	0.0%	56	2.8%	493	24.9%	652	32.9%
213	1716	995	58.0%	155	9.0%	0	0.0%	0	0.0%	0	0.0%	9	0.5%	94	5.5%	463	27.0%	721	42.0%
214	4097	1464	35.7%	469	11.4%	7	0.2%	628	15.3%	0	0.0%	80	2.0%	251	6.1%	1198	29.2%	2633	64.3%
215	2813	1633	58.1%	20	0.7%	5	0.2%	352	12.5%	0	0.0%	8	0.3%	8	0.3%	787	28.0%	1180	41.9%
216	4266	2074	48.6%	106	2.5%	0	0.0%	415	9.7%	0	0.0%	26	0.6%	257	6.0%	1388	32.5%	2192	51.4%
217	6358	4628	72.8%	8	0.1%	16	0.3%	394	6.2%	0	0.0%	46	0.7%	377	5.9%	889	14.0%	1730	27.2%
218	2007	1292	64.4%	58	2.9%	0	0.0%	50	2.5%	0	0.0%	0	0.0%	203	10.1%	404	20.1%	715	35.6%
301	4467	3690	82.6%	85	1.9%	7	0.2%	337	7.5%	0	0.0%	0	0.0%	261	5.8%	87	1.9%	777	17.4%
351	2109	1898	90.0%	25	1.2%	0	0.0%	71	3.4%	0	0.0%	0	0.0%	54	2.6%	61	2.9%	211	10.0%
352	4777	3777	79.1%	304	6.4%	0	0.0%	343	7.2%	0	0.0%	0	0.0%	213	4.5%	140	2.9%	1000	20.9%
401	1496	1138	76.1%	118	7.9%	2	0.1%	126	8.4%	0	0.0%	14	0.9%	76	5.1%	22	1.5%	358	23.9%
501.01	5687	3001	52.8%	1441	25.3%	0	0.0%	552	9.7%	0	0.0%	8	0.1%	256	4.5%	429	7.5%	2686	47.2%
501.03	3973	1930	48.6%	907	22.8%	19	0.5%	0	0.0%	0	0.0%	0	0.0%	972	24.5%	145	3.6%	2043	51.4%
501.04	2902	1174	40.5%	1312	45.2%	0	0.0%	181	6.2%	0	0.0%	0	0.0%	3	0.1%	232	8.0%	1728	59.5%
601.01	4228	2646	62.6%	531	12.6%	0	0.0%	274	6.5%	0	0.0%	15	0.4%	277	6.6%	485	11.5%	1582	37.4%
601.02	3145	2604	82.8%	345	11.0%	0	0.0%	106	3.4%	0	0.0%	14	0.4%	23	0.7%	53	1.7%	541	17.2%
602	5940	3764	63.4%	1164	19.6%	32	0.5%	489	8.2%	0	0.0%	230	3.9%	79	1.3%	182	3.1%	2176	36.6%
701	4376	3851	88.0%	77	1.8%	0	0.0%	128	2.9%	0	0.0%	0	0.0%	161	3.7%	159	3.6%	525	12.0%
702	5202	4834	92.9%	8	0.2%	0	0.0%	97	1.9%	0	0.0%	8	0.2%	56	1.1%	199	3.8%	368	7.1%
703	5240	3999	76.3%	388	7.4%	0	0.0%	347	6.6%	0	0.0%	0	0.0%	121	2.3%	385	7.3%	1241	23.7%
801	2591	1896	73.2%	160	6.2%	7	0.3%	245	9.5%	0	0.0%	24	0.9%	109	4.2%	150	5.8%	695	26.8%
802	3767	3163	84.0%	72	1.9%	22	0.6%	150	4.0%	0	0.0%	22	0.6%	165	4.4%	173	4.6%	604	16.0%
803	3915	3433	87.7%	49	1.3%	0	0.0%	87	2.2%	0	0.0%	7	0.2%	246	6.3%	93	2.4%	482	12.3%
804	3461	2537	73.3%	116	3.4%	0	0.0%	425	12.3%	0	0.0%	123	3.6%	184	5.3%	76	2.2%	924	26.7%
901	3934	2697	68.6%	582	14.8%	0	0.0%	221	5.6%	0	0.0%	13	0.3%	322	8.2%	99	2.5%	1237	31.4%
902	2288	1850	80.9%	186	8.1%	0	0.0%	75	3.3%	0	0.0%	0	0.0%	24	1.0%	153	6.7%	438	19.1%
903	3199	2016	63.0%	639	20.0%	125	3.9%	221	6.9%	0	0.0%	0	0.0%	84	2.6%	114	3.6%	1183	37.0%
906	4297	3319	77.2%	417	9.7%	0	0.0%	200	4.7%	0	0.0%	0	0.0%	127	3.0%	234	5.4%	978	22.8%
907	3119	3064	98.2%	12	0.4%	0	0.0%	8	0.3%	0	0.0%	0	0.0%	35	1.1%	0	0.0%	55	1.8%
908	2187	2060	94.2%	50	2.3%	0	0.0%	25	1.1%	0	0.0%	0	0.0%	39	1.8%	13	0.6%	127	5.8%
909	4174	3378	80.9%	269	6.4%	17	0.4%	49	1.2%	0	0.0%	0	0.0%	254	6.1%	207	5.0%	796	19.1%
910	4910	3864	78.7%	261	5.3%	32	0.7%	169	3.4%	0	0.0%	0	0.0%	295	6.0%	289	5.9%	1046	21.3%
911	4000	3651	91.3%	126	3.2%	0	0.0%	15	0.4%	0	0.0%	11	0.3%	139	3.5%	58	1.5%	349	8.7%
912	5681	4376	77.0%	399	7.0%	0	0.0%	451	7.9%	0	0.0%	12	0.2%	358	6.3%	85	1.5%	1305	23.0%
913	3683	3339	90.7%	21	0.6%	0	0.0%	137	3.7%	0	0.0%	18	0.5%	61	1.7%	107	2.9%	344	9.3%
914	2444	1915	78.4%	133	5.4%	25	1.0%	149	6.1%	13	0.5%	22	0.9%	49	2.0%	138	5.6%	529	21.6%
1001	3826	2082	54.4%	513	13.4%	26	0.7%	129	3.4%	17	0.4%	37	1.0%	215	5.6%	807	21.1%	1744	45.6%
1002	4337	2714	62.6%	349	8.0%	47	1.1%	148	3.4%	0	0.0%	0	0.0%	357	8.2%	722	16.6%	1623	37.4%
1003	2347	1990	84.8%	18	0.8%	23	1.0%	54	2.3%	0	0.0%	47	2.0%	32	1.4%	183	7.8%	357	15.2%
1004	2907	2005	69.0%	207	7.1%	0	0.0%	169	5.8%	0	0.0%	0	0.0%	60	2.1%	466	16.0%	902	31.0%
1005	3638	2532	69.6%	302	8.3%	57	1.6%	77	2.1%	0	0.0%	0	0.0%	212	5.8%	458	12.6%	1106	30.4%
1006	1918	1393	72.6%	63	3.3%	0	0.0%	0	0.0%	0	0.0%	21	1.1%	98	5.1%	343	17.9%	525	27.4%
1007	3081	2037	66.1%	38	1.2%	7	0.2%	18	0.6%	0	0.0%	28	0.9%	49	1.6%	904	29.3%	1044	33.9%
1008	2925	2414	82.5%	48	1.6%	38	1.3%	0	0.0%	0	0.0%	0	0.0%	58	2.0%	367	12.5%	511	17.5%
1009	4044	2554	63.2%	240	5.9%	13	0.3%	563	13.9%	0	0.0%	0	0.0%	287	7.1%	387	9.6%	1490	36.8%
1010	5346	3647	68.2%	672	12.6%	0	0.0%	364	6.8%	0	0.0%	0	0.0%	220	4.1%	443	8.3%	1699	31.8%
1011	1652	1301	78.8%	104	6.3%	2	0.1%	18	1.1%	0	0.0%	0	0.0%	82	5.0%	145	8.8%	351	21.2%
1012	3028	2313	76.4%	123	4.1%	0	0.0%	0	0.0%	0	0.0%	25	0.8%	312	10.3%	255	8.4%	715	23.6%
1013	2780	2277	81.9%	164	5.9%	0	0.0%	26	0.9%	0	0.0%	0	0.0%	141	5.1%	172	6.2%	503	18.1%
1014	4143	3038	73.3%	248	6.0%	7	0.2%	50	1.2%	0	0.0%	8	0.2%	117	2.8%	675	16.3%	1105	26.7%
1015	4310	2612	60.6%	477	11.1%	59	1.4%	8	0.2%	10	0.2%	0	0.0%	131	3.0%	1013	23.5%	1698	39.4%
1016	3922	3290	83.9%	53	1.4%	0	0.0%	24	0.6%	0	0.0%	0	0.0%	1	0.0%	554	14.1%	632	16.1%
1017	3462	2424	70.0%	63	1.8%	34	1.0%	26	0.8%	0	0.0%	9	0.3%	139	4.0%	767	22.2%	1038	30.0%
1018	2554	2075	81.2%	76	3.0%	9	0.4%	192	7.5%	0	0.0%	0	0.0%	30	1.2%	172	6.7%	479	18.8%
1101	4108	2026	49.3%	500	12.2%	70	1.7%	0	0.0%	0	0.0%	0	0.0%	169	4.1%	1343	32.7%	2082	50.7%
1201.01	3865	3180	82.3%	96	2.5%	0	0.0%	320	8.3%	0	0.0%	0	0.0%	30	0.8%	239	6.2%	685	17.7%
1201.02	3834	3236	84.4%	135	3.5%	0	0.0%	106	2.8%	0	0.0%	0	0.0%	185	4.8%	172	4.5%	598	15.6%
1202.01	3882	3057	78.7%	107	2.8%	18	0.5%	77	2.0%	0	0.0%	0	0.0%	173	4.5%	450	11.6%	825	21.3%
1202.02	3091	2127	68.8%	20	0.6%	9	0.3%	36	1.2%	0	0.0%	0	0.0%	231	7.5%	668	21.6%	964	31.2%
1202.03	3831	2595	67.7%	302	7.9%	32	0.8%	140	3.7%	0	0.0%	0	0.0%	59	1.5%	703	18.4%	1236	32.3%
1203	2259	1496	66.2%	36	1.6%	0	0.0%	46	2.0%	8	0.4%	0	0.0%	121	5.4%	552	24.4%	763	33.8%
1204	6780	4047	59.7%	789	11.6%	16	0.2%	488	7.2%	0	0.0%	0	0.0%	198	2.9%	1242	18.3%	2733	40.3%
1205.01	4103	2997	73.0%	302	7.4%	0	0.0%	210	5.1%	0	0.0%	0	0.0%	128	3.1%	466	11.4%	1106	27.0%
1205.02	5753	4237	73.6%	117	2.0%	35	0.6%	499	8.7%	0	0.0%	116	2.0%	233	4.1%	516	9.0%	1516	26.4%
1301	4820	3772	78.3%	38	0.8%	0	0.0%	77	1.6%	0	0.0%	0	0.0%	142	2.9%	791	16.4%	1048	21.7%
1302	2884	2666	92.4%	9	0.3%	0	0.0%	43	1.5%	0	0.0%	0	0.0%	56	1.9%	110	3.8%	218	7.6%
1401	3222	2932	91.0%	4	0.1%	39	1.2%	103	3.2%	8	0.2%	0	0.0%	23	0.7%	113	3.5%	290	9.0%
1402.01	5663	4607	81.4%	107	1.9%	0	0.0%	186	3.3%	0	0.0%	0	0.0%	116	2.0%	647	11.4%	1056	18.6%
1402.02	5850	4453	76.1%	79	1.4%	14	0.2%	717	12.3%	0	0.0%	285	4.9%	143	2.4%	159	2.7%	1397	23.9%
1501	9281	7122	76.7%	175	1.9%	0	0.0%	475	5.1%	0	0.0%	518	5.6%	99	1.1%	892	9.6%	2159	23.3%
1503.01	5958	5272	88.5%	6	0.1%	10	0.2%	196	3.3%	0	0.0%	22	0.4%	132	2.2%	320	5.4%	686	

1803	3506	2638	75.2%	32	0.9%	10	0.3%	10	0.3%	0	0.0%	0	0.0%	227	6.5%	589	16.8%	868	24.8%
1804	2800	2353	84.0%	57	2.0%	13	0.5%	0	0.0%	0	0.0%	0	0.0%	40	1.4%	337	12.0%	447	16.0%
1805	4186	3582	85.6%	48	1.1%	12	0.3%	78	1.9%	0	0.0%	0	0.0%	171	4.1%	295	7.0%	604	14.4%
1851	4622	3533	76.4%	98	2.1%	36	0.8%	51	1.1%	0	0.0%	7	0.2%	30	0.6%	867	18.8%	1089	23.6%
1852	4632	3802	82.1%	113	2.4%	0	0.0%	54	1.2%	0	0.0%	18	0.4%	11	0.2%	634	13.7%	830	17.9%
1853	4156	3187	76.7%	279	6.7%	9	0.2%	429	10.3%	0	0.0%	0	0.0%	98	2.4%	154	3.7%	969	23.3%
1854	1056	5	0.5%	1000	94.7%	14	1.3%	0	0.0%	0	0.0%	0	0.0%	35	3.3%	2	0.2%	1051	99.5%
1855	1525	8	0.5%	1397	91.6%	0	0.0%	96	6.3%	0	0.0%	0	0.0%	18	1.2%	6	0.4%	1517	99.5%
1856	2083	469	22.5%	1439	69.1%	29	1.4%	0	0.0%	0	0.0%	0	0.0%	80	3.8%	66	3.2%	1614	77.5%
1857	2223	95	4.3%	1620	72.9%	10	0.4%	0	0.0%	0	0.0%	0	0.0%	84	3.8%	414	18.6%	2128	95.7%
1858	1412	31	2.2%	1039	73.6%	5	0.4%	187	13.2%	0	0.0%	0	0.0%	0	0.0%	150	10.6%	1381	97.8%
1859	811	48	5.9%	659	81.3%	0	0.0%	61	7.5%	0	0.0%	0	0.0%	35	4.3%	8	1.0%	763	94.1%
1860	1638	140	8.5%	1079	65.9%	4	0.2%	4	0.2%	0	0.0%	0	0.0%	62	3.8%	349	21.3%	1498	91.5%
1861	2004	157	7.8%	1427	71.2%	78	3.9%	261	13.0%	0	0.0%	0	0.0%	20	1.0%	61	3.0%	1847	92.2%
1862	1249	55	4.4%	1080	86.5%	0	0.0%	65	5.2%	0	0.0%	0	0.0%	16	1.3%	33	2.6%	1194	95.6%
1863	4546	2207	48.5%	1682	37.0%	7	0.2%	61	1.3%	0	0.0%	0	0.0%	132	2.9%	457	10.1%	2339	51.5%
1864	1284	987	76.9%	88	6.9%	0	0.0%	52	4.0%	0	0.0%	0	0.0%	32	2.5%	125	9.7%	297	23.1%
1865	1823	656	36.0%	233	12.8%	5	0.3%	11	0.6%	0	0.0%	0	0.0%	120	6.6%	798	43.8%	1167	64.0%
1866	1932	899	46.5%	261	13.5%	9	0.5%	5	0.3%	0	0.0%	0	0.0%	19	1.0%	739	38.3%	1033	53.5%
1868	1479	394	26.6%	393	26.6%	7	0.5%	47	3.2%	0	0.0%	0	0.0%	85	5.7%	553	37.4%	1085	73.4%
1869	2376	1881	79.2%	131	5.5%	0	0.0%	203	8.5%	0	0.0%	0	0.0%	113	4.8%	48	2.0%	495	20.8%
1870	3256	2578	79.2%	157	4.8%	12	0.4%	207	6.4%	0	0.0%	39	1.2%	91	2.8%	172	5.3%	678	20.8%
1872	5866	3777	64.4%	1429	24.4%	8	0.1%	102	1.7%	0	0.0%	0	0.0%	176	3.0%	374	6.4%	2089	35.6%
1873	6500	5220	80.3%	79	1.2%	52	0.8%	511	7.9%	0	0.0%	0	0.0%	125	1.9%	513	7.9%	1280	19.7%
1874	3465	3000	86.6%	150	4.3%	26	0.8%	129	3.7%	0	0.0%	0	0.0%	120	3.5%	40	1.2%	465	13.4%

Note: Highlighted cells have a total minority rate greater than the county average of 49%  
 Data Source: Data from 2021: ACS 5-Year Estimates Census.

Milwaukee County Population and Poverty Chart 2021			
Census Tract	2021 Population	Poverty Population	Percent Poverty
1.01	4520	1674	37.0%
1.02	3161	413	13.1%
2.01	5038	2070	41.1%
2.02	6672	600	9.0%
3.01	1342	65	4.8%
3.02	2952	601	20.4%
3.03	1850	320	17.3%
3.04	3193	85	2.7%
4	2598	681	26.2%
5.01	3907	582	14.9%
5.02	4791	1473	30.7%
6	6457	1367	21.2%
7	3652	547	15.0%
8	5397	1039	19.3%
9	4462	1344	30.1%
10	3733	1094	29.3%
11	2113	449	21.2%
12	3277	1530	46.7%
13	3958	1139	28.8%
14	2796	858	30.7%
15	3089	869	28.1%
16	2923	744	25.5%
17	4889	971	19.9%
18	2502	621	24.8%
19	3346	773	23.1%
20	2713	1104	40.7%
21	1862	878	47.2%
22	2060	255	12.4%
23	4623	1352	29.2%
24	2444	423	17.3%
25	2392	715	29.9%
26	2737	1314	48.0%
27	1986	893	45.0%
28	2254	807	35.8%

29	2595	720	27.7%
30	4278	1159	27.1%
31	3917	1494	38.1%
32	2772	491	17.7%
33	5190	1281	24.7%
34	5997	1228	20.5%
35	3193	903	28.3%
36	1482	271	18.3%
37	2180	218	10.0%
38	2478	390	15.7%
39	2633	583	22.1%
40	2392	741	31.0%
41	2915	840	28.8%
42	3185	461	14.5%
43	4660	1286	27.6%
44	2466	638	25.9%
45	1915	685	35.8%
46	2858	873	30.5%
47	3580	1522	42.5%
48	3855	1563	40.5%
49	4020	902	22.4%
50	5018	538	10.7%
51	3040	802	26.4%
52	1540	137	8.9%
53	2009	261	13.0%
54	2833	269	9.5%
55	3082	201	6.5%
56	1895	119	6.3%
57	2268	115	5.1%
58	3527	295	8.4%
59	3905	1193	30.6%
60	2337	888	38.0%
61	2364	720	30.5%
62	2538	939	37.0%
63	1658	780	47.0%
64	1956	980	50.1%

65	2420	1185	49.0%
66	1894	881	46.5%
67	980	302	30.8%
68	1971	752	38.2%
69	1962	312	15.9%
70	2587	930	35.9%
71	2041	479	23.5%
72	2838	528	18.6%
73	1975	599	30.3%
74	1356	252	18.6%
75	2521	505	20.0%
76	3048	434	14.2%
77	3669	1059	28.9%
78	2719	1253	46.1%
79	1867	144	7.7%
80	1807	382	21.1%
81	1097	301	27.4%
84	603	180	29.9%
85	1348	406	30.1%
86	785	189	24.1%
87	864	580	67.1%
88	1674	741	44.3%
89	1374	664	48.3%
90	1913	704	36.8%
91	1807	995	55.1%
92	1449	272	18.8%
93	2542	459	18.1%
94	2456	60	2.4%
95	2114	235	11.1%
96	1791	310	17.3%
97	1270	676	53.2%
98	1732	986	56.9%
99	1133	389	34.3%
106	1171	147	12.6%
107	2275	367	16.1%
108	2293	550	24.0%

110	2831	505	17.8%
111	1338	243	18.2%
112	2387	544	22.8%
113	2292	340	14.8%
114	1494	201	13.5%
122	1962	723	36.9%
123	1086	473	43.6%
124	2455	388	15.8%
125	2002	124	6.2%
126	2177	369	16.9%
127	1031	90	8.7%
128	2517	435	17.3%
129	2887	716	24.8%
130	1801	228	12.7%
133	849	269	31.7%
134	2315	630	27.2%
135	1906	828	43.4%
136	1819	796	43.8%
137	1379	554	40.2%
141	1496	820	54.8%
143	2243	481	21.4%
144	2484	444	17.9%
146	1538	1141	74.2%
147	1545	1175	76.1%
148	1963	1270	64.7%
149	1007	451	44.8%
157	2953	1056	35.8%
158	2430	856	35.2%
159	3158	577	18.3%
160	2971	638	21.5%
161	3666	673	18.4%
162	4036	1219	30.2%
163	4433	1234	27.8%
164	3884	1758	45.3%
165	2372	949	40.0%
166	1916	1037	54.1%

167	3320	1057	31.8%
168	3055	1025	33.6%
169	3667	1161	31.7%
170	4430	1106	25.0%
171	2872	428	14.9%
172	2718	731	26.9%
173	4206	764	18.2%
174	2725	1147	42.1%
175	3670	1737	47.3%
176	2838	1246	43.9%
179	3073	224	7.3%
180	2896	449	15.5%
181	1943	77	4.0%
182	1499	60	4.0%
183	2331	165	7.1%
184	1333	145	10.9%
185	1822	213	11.7%
186	3039	1266	41.7%
187	3353	594	17.7%
188	1533	443	28.9%
189	1519	179	11.8%
190	4501	750	16.7%
191	3514	611	17.4%
192	3097	426	13.8%
193	3083	209	6.8%
194	4015	493	12.3%
195	3344	312	9.3%
196	3717	452	12.2%
197	5800	453	7.8%
198	5436	683	12.6%
199	3711	157	4.2%
200	3745	435	11.6%
201	3956	721	18.2%
202	3465	676	19.5%
203	3890	681	17.5%
204	3693	546	14.8%



205	2919	462	15.8%
206	3281	298	9.1%
207	4053	424	10.5%
208	3076	127	4.1%
209	2515	212	8.4%
210	2280	242	10.6%
211	1412	48	3.4%
212	1980	245	12.4%
213	1707	242	14.2%
214	4097	1572	38.4%
215	2813	152	5.4%
216	4266	682	16.0%
217	6270	515	8.2%
218	1940	303	15.6%
301	4467	239	5.4%
351	2109	30	1.4%
352	4586	181	3.9%
401	1496	17	1.1%
501.01	5681	148	2.6%
501.03	3973	736	18.5%
501.04	2902	295	10.2%
601.01	4149	627	15.1%
601.02	3145	176	5.6%
602	5664	798	14.1%
701	4349	109	2.5%
702	5202	283	5.4%
703	5204	379	7.3%
801	2591	315	12.2%
802	3767	244	6.5%
803	3907	149	3.8%
804	3461	736	21.3%
901	3786	206	5.4%
902	2288	105	4.6%
903	3178	255	8.0%
906	4227	230	5.4%
907	3119	40	1.3%

908	2187	86	3.9%
909	4019	205	5.1%
910	4892	175	3.6%
911	4000	139	3.5%
912	5659	841	14.9%
913	3683	154	4.2%
914	2433	66	2.7%
1001	3721	347	9.3%
1002	4300	483	11.2%
1003	2302	303	13.2%
1004	2886	405	14.0%
1005	3513	299	8.5%
1006	1899	189	10.0%
1007	3019	138	4.6%
1008	2925	167	5.7%
1009	3989	728	18.3%
1010	5346	302	5.6%
1011	1652	205	12.4%
1012	2793	293	10.5%
1013	2765	200	7.2%
1014	4099	678	16.5%
1015	4302	576	13.4%
1016	3794	418	11.0%
1017	3454	322	9.3%
1018	2549	101	4.0%
1101	4101	526	12.8%
1201.01	3838	242	6.3%
1201.02	3719	170	4.6%
1202.01	3879	514	13.3%
1202.02	3012	412	13.7%
1202.03	3790	382	10.1%
1203	2237	174	7.8%
1204	6780	528	7.8%
1205.01	4079	188	4.6%
1205.02	5611	543	9.7%
1301	4742	207	4.4%

1302	2859	110	3.8%
1401	3161	86	2.7%
1402.01	5642	293	5.2%
1402.02	5837	281	4.8%
1501	9256	413	4.5%
1503.01	5929	206	3.5%
1503.03	5105	116	2.3%
1503.04	3944	124	3.1%
1601.01	4321	80	1.9%
1601.02	2422	105	4.3%
1602.02	7760	372	4.8%
1602.03	6634	401	6.0%
1602.05	3082	366	11.9%
1602.06	1665	88	5.3%
1603.01	5535	38	0.7%
1603.02	4726	319	6.7%
1701	2434	279	11.5%
1702	4028	732	18.2%
1703	2283	202	8.8%
1704	3135	81	2.6%
1705	2165	437	20.2%
1706	3390	660	19.5%
1707	3126	322	10.3%
1801	3123	243	7.8%
1802	4574	644	14.1%
1803	3506	416	11.9%
1804	2781	253	9.1%
1805	4166	592	14.2%
1851	4610	726	15.7%
1852	4591	524	11.4%
1853	4089	373	9.1%
1854	1056	270	25.6%
1855	1525	370	24.3%
1856	2076	538	25.9%
1857	2218	1125	50.7%
1858	1390	570	41.0%

1859	811	276	34.0%
1860	1606	804	50.1%
1861	1975	984	49.8%
1862	1195	531	44.4%
1863	2547	738	29.0%
1864	304	189	62.2%
1865	1823	496	27.2%
1866	1917	598	31.2%
1868	1442	558	38.7%
1869	2224	54	2.4%
1870	3167	399	12.6%
1872	3937	344	8.7%
1873	6500	492	7.6%
1874	3424	291	8.5%

Note: Highlighted census tracts have a total poverty rate greater than the county average of 17.8%.

Data Source: 2021: American Community Survey 5 Year Estimates