



MILWAUKEE COUNTY TRANSIT SYSTEM

2017 TITLE VI PROGRAM

August 1, 2017

2017 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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MCTS 2017 TITLE VI PROGRAM UPDATE
EXECUTIVE SUMMARY
May 15, 2017

OVERVIEW

The MCTS 2017 Title VI Program Update represents an update of the 2014 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 analysis.

2017 TITLE VI UPDATE HIGHLIGHTS: SERVICE AND FARE EQUITY ANALYSIS

In 2015, MCTS reduced the number of transit fare media outlets because of the added convenience of M-Card on-line. To mitigate impacts on minority populations and a disproportionate burden on low-income populations MCTS reviews the distribution of M-Card Recharge Units throughout the County and seeks to site new units in minority, and low-income census tracts when feasible.

In 2015, as GO Pass was being implemented, the Southeastern Wisconsin Regional Planning Commission (SEWRPC) evaluated the program and found no disparate impact or disproportionate burden from the program as long as fares do not need to be raised as a result of providing free fares to seniors and people with disabilities. In 2017, some MCTS fares were increased; however, GO Pass eligibility criteria were also modified to focus on low-income populations.

In 2016, Route 279 service ended due to low ridership. Although the service was used by minority, and low-income passengers, the availability of other routes funded by the Zoo Litigation Settlement in the same geographic area with a similar purpose mitigates unintended disparate impacts on minority populations and any disproportionate burden on low-income populations.

In 2017, Freeway Flyer fares were increased as well as the cost of 7-day and 31-day passes. Surveys showed that the MCTS 7-day pass is used disproportionately by minority populations; therefore, the percent increase in the cost of the 7-day pass was reduced in comparison to the percent increase for other fares to mitigate its impact.

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 2017 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: Jeff Sponcia, Manager of Planning

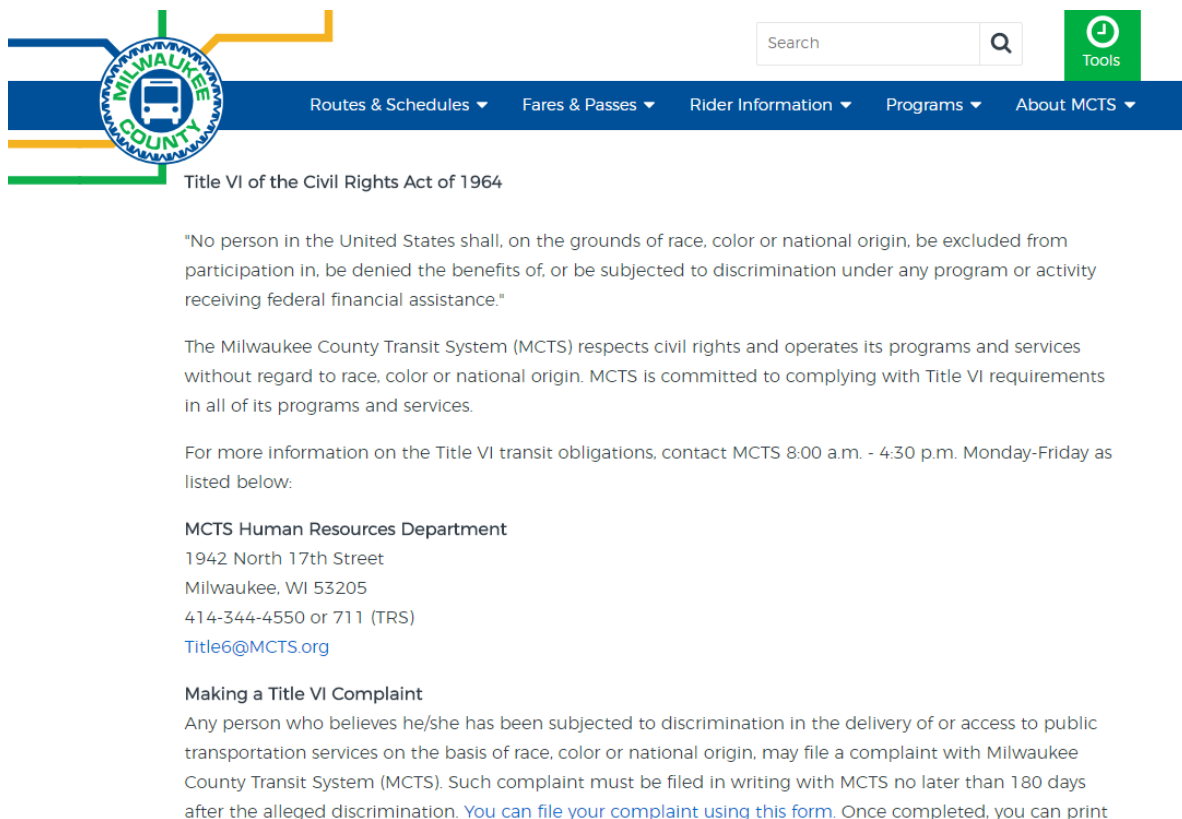
SUBJECT: Title VI Notice to the Public

DATE: April 27, 2017

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.



The screenshot shows the Milwaukee County Transit System website. At the top left is the MCTS logo, a circular emblem with a bus and the text "MILWAUKEE COUNTY". To the right is a search bar and a "Tools" button. Below these is a dark blue navigation bar with white text and dropdown arrows for "Routes & Schedules", "Fares & Passes", "Rider Information", "Programs", and "About MCTS". The main content area has a white background with a blue header for "Title VI of the Civil Rights Act of 1964".

"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

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

the form and mail to MCTS at the address below.

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

[2014 MCTS Title VI Update](#)

2017 MCTS Title VI Update coming soon

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

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

[Procedimientos de Queja para 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 17th 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 17th 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
Interoffice Memorandum**

TO: File

FROM: Mick Jarvis, MHRLR - Human Resources Generalist

RE: Title VI Summary of Complaints 2014-2016

DATE: April 27, 2017

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, 2014 through December 31, 2016.

MCTS
Public
Participation
Plan

2017

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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) (Executive Order 13166): 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.

Minority: A person who is a citizen or lawful permanent resident of the United States and who is:

- Black: a person having origins in any of the black racial groups of Africa,
- Hispanic: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race,
- 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 include outreach strategies for other traditionally underserved constituencies, such as people with disabilities and low-income populations.

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, minority 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 without regard to race, color, or national origin;
- Ensure access to transit-related programs and activities by persons with limited English proficiency.

The Plan establishes three 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 minority status, income level, or the ability to speak English. Public participation activities will be designed to be accessible to all persons. The main objectives of this plan are as follows:

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

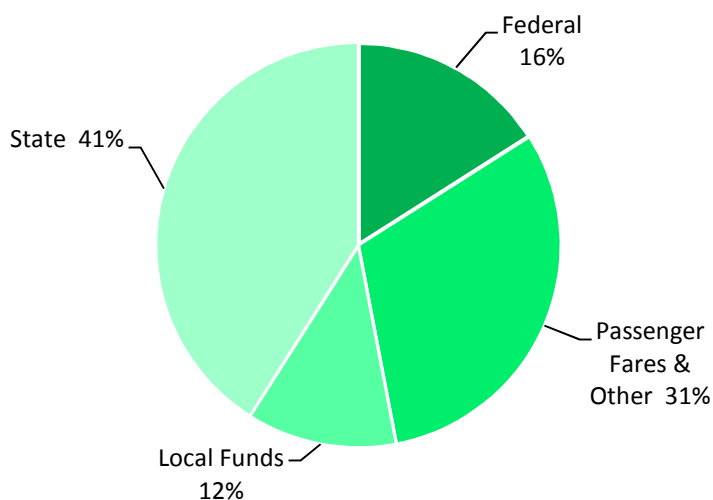
Section 2 – Overview of MCTS

History and Facts

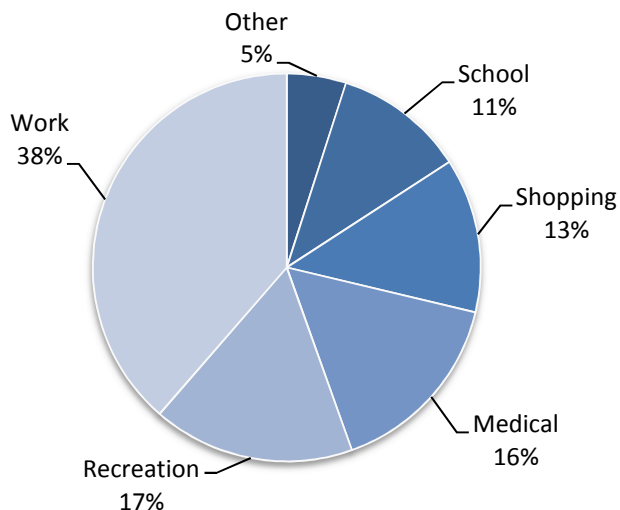
Founded in 1975, MCTS is the 32nd largest transit system in the nation and the largest transit agency in Wisconsin. As the primary transit provider for Milwaukee County, MCTS services 24 communities and provides limited service to Washington, Waukesha and Ozaukee Counties. MCTS has over 5,500 bus stops and operates approximately 60 routes, including Freeway Flyer 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 over 36 million rides a year—of those over 530,000 are through Paratransit, a division of the company that provides rides to people with disabilities.

2015 Funding Sources



Primary Uses of MCTS

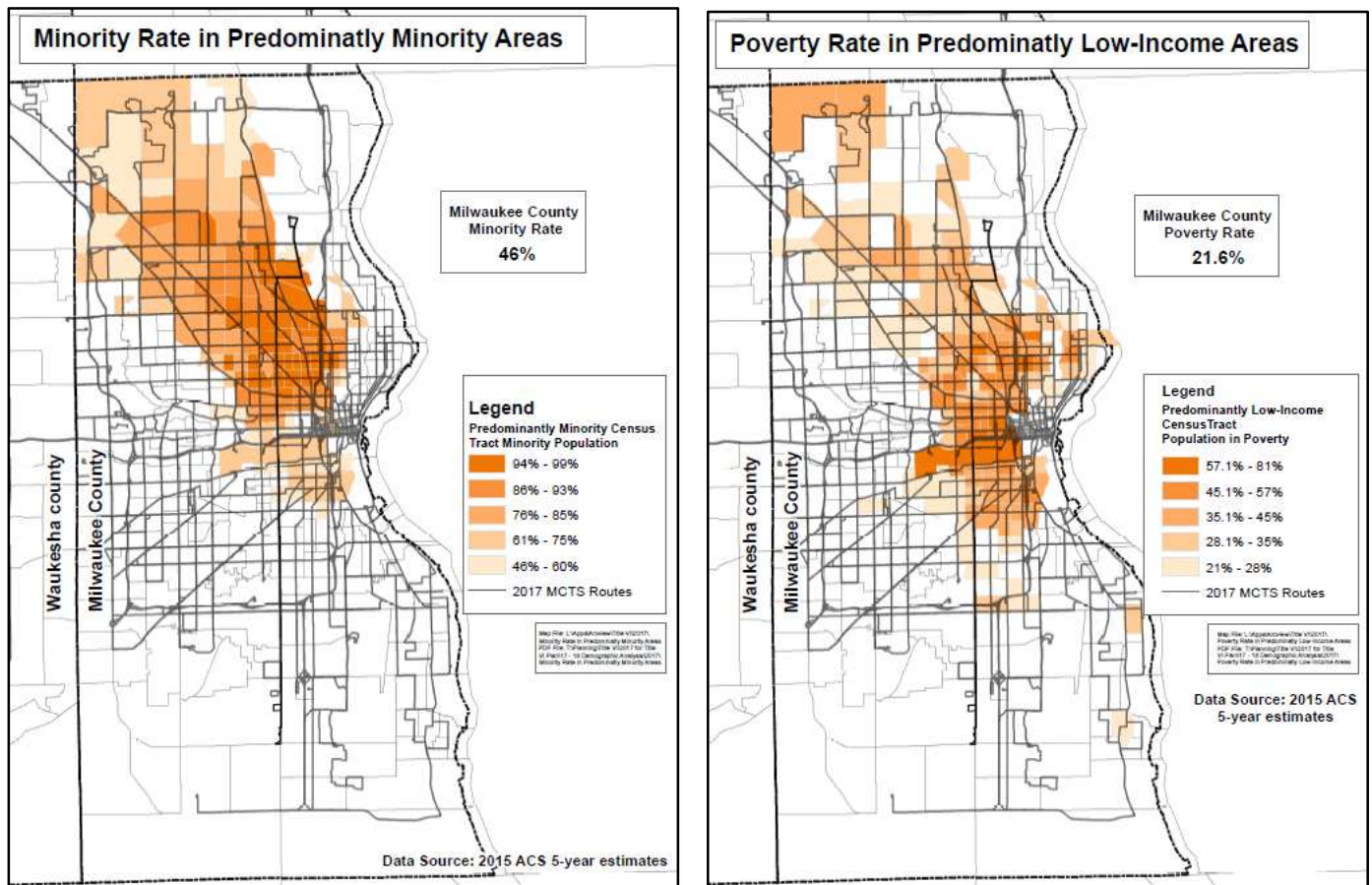


Approximately 40% of individuals use MCTS to commute to jobs on a daily basis. With two major educational institutions located in the heart of the city, approximately 40,000 Milwaukee area college students participate in the U-PASS program, taking advantage of discounted rates to and from college and other destinations. Designations of primary uses are shown above.

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 951,448 of Milwaukee County residents (U.S. Census estimate as of July 1, 2016).

The demographic profile of the MCTS service area is approximately 46% minority and 21% 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 142,257 persons or 16% of the total population in Milwaukee County that speak a language other than English at home (American Community Survey, 2015). The following languages are the most commonly spoken among LEP households in MCTS' service area: Spanish (62%), Hmong (7%), German (3%), and Arabic (3%).

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 the latest Title VI submittal in 2017, 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 polices. Specific efforts will be tailored depending on the scope of the proposed plan or activity and the resources available for public outreach.

Public Meetings

- **Public Open Houses** – MCTS can host a public open house to engage with the public on how changes to service, fares or policies could affect them. The agenda of a meeting would be to present information on the purpose and need for the service change / proposal being discussed and to engage in dialogue and take comments. Staff would be available to interact with the public in attendance, answer questions and take comments on any of the plans. Comment cards will also be available.
- **Public Hearings** –In the case of a public hearing, MCTS will give information on the purpose, need, and background of services and updates being discussed and take either verbal or written public comments. It is a primarily a forum for voicing opinions. The Milwaukee County Board hosts an annual public hearing on the annual budget on transit service.

Social Media

MCTS will include a separate page on RideMCTS.com devoted exclusively to quarterly route and schedule changes. In addition, persons that follow MCTS on Twitter or Facebook will be notified of upcoming plans / meetings. MCTS will make similar outreach efforts for persons that belong to its RiderInsider program.

MCTS will also 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. Call 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 Call 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. From this, a ridership profile is created which has assisted multiple departments in how to reach riders.

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 set to 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.

Cross-Departmental Training

Staff training is a key ingredient to the activation of the Plan into a company-wide effort. The preliminary suggestions below are possible examples how various departments that currently interact with the public can work together.

Scheduling & Planning Department

- Conduct research and analysis of existing routes and identify opportunities for expanding, discontinuing, or adding service.
- Host an annual webinar to obtain public feedback on upcoming major service change efforts.

Paratransit Department

- Communicate and coordinate outreach to ADA community, as well as quality assurance program to ensure MCTS services, facilities, and events are always in compliance with the Americans with Disabilities Act.
- Provide outreach and information to aging populations about services.

Marketing Department

- Releases information to the public about upcoming outreach activities and updates through social media.
- Customer service representatives will serve as point of contact support in collecting feedback from the public, both online and on the phone.
- Conducts annual survey to identify ridership and customer satisfaction.

Transportation Department

- Responsible for posting notices for detours/changes at bus stops and signage for shutdowns internally and externally.
- Assign Public Relations Operators to events, as needed.

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 to incorporate 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
- Use standardized surveys and online forms to obtain feedback
- Engage bus operators and station managers in outreach activities

**Milwaukee County Transit System
Public Outreach and Involvement Activities**

Subject Matter	Sponsor	Forum	Date	Location
2014				
Transit Grant Application 85.21	Transportation, Public Works and Transit Committee	Public Hearing	12/3/2014	Room 201B
Southridge Shelters and Transit	Transportation, Public Works and Transit Committee	Public Hearing	11/6/2014	Room 201B
2014 Budget	Intergovernmental Cooperation Council of Milwaukee County	Public Hearing	10/22/2014	Room 201-B
Route 61 Transit Service Transit CMAQ Routes 10, 14, 30, 61 MCTS Budget, CMAQ, MCards, MCO	Transportation, Public Works and Transit Committee	Public Hearing	9/10/2014	General Mitchell International Airport 5300 S. Howell Avenue - Sijan/Lovell Rooms Milwaukee, WI 53207
MCTS 2014 Title VI Program Plan Update	Transportation, Public Works and Transit Committee	Public Hearing	7/16/2014	Room 201-B
Info Update Title VI MCTS, MCTS Title IV Policy Definitions, MCTS New Route 6 New Berlin	Transportation, Public Works and Transit Committee	Public Hearing	6/25/2014	Room 201-B
Route 55 Layton Extension	Transportation, Public Works and Transit Committee	Public Hearing	3/5/2014	Room 201-B
2015				
Reconstituting TSAC, CMAQ Application Request				
2015 85.20 Urban Mass Transit Assistance Contract	Transportation, Public Works and Transit Committee	Public Hearing	6/10/2015	Room 201B
MCTS Bus Strike	Transportation, Public Works and Transit Committee	Public Hearing	7/15/2015	Room 201B
TSAC Transit Suggestions, Transit Security Update - Oct 2015, Transit Signal in Wisconsin Avenue Corridor	Transportation, Public Works and Transit Committee	Public Hearing	10/23/2015	Room 201B
2015 Budget	Intergovernmental Cooperation Council of Milwaukee County	Public Hearing	11/9/2015	City of Oak Creek City Hall/Library 8040 S. 6th Street Oak Creek, WI 53154
2014 Section 85.21 grant application	Transportation, Public Works and Transit Committee	Public Hearing	12/2/2015	Room 201-B
FTA 5310 Unique Milwaukee County Free Pass	Transportation, Public Works and Transit Committee	Public Hearing	5/6/2015	Room 201B
Unique Milwaukee County Free Pass	Transportation, Public Works and Transit Committee	Public Hearing	4/8/2015	Room 201B
Rehab/Transit Alternative I-94, Picking Up the Pace, smart card ID program for GO Pass participants	Transportation, Public Works and Transit Committee	Public Hearing	3/11/2015	Room 201B
Farebox Implementation Project	Transportation, Public Works and Transit Committee	Public Hearing	1/21/2015	Room 201B
2016				
Transit Operations Update, 5307 Grant Program, Bus Route Changes Transit Center Sale, Transit-Paratransit Report, Route 279 Discontinuation	Transportation, Public Works and Transit Committee	Public Hearing	9/7/2016	Room 201B
5310 FTA Grants Section 5339 Bus & Facility, Grant Program 85.20 Urban Mass Transit Contract	Transportation, Public Works and Transit Committee	Public Hearing	7/13/2016	Room 201B
2016 Transit Projects BRT Capital Project Creation	Transportation, Public Works and Transit Committee	Public Hearing	5/11/2016	Room 201B
Route X80 Policy Recommendation, Free Bus Rides ID	Transportation, Public Works and Transit Committee	Public Hearing	1/20/2016	Room 201B
2016 Budget	Milwaukee County Board of Supervisors	Public Hearing	11/7/2016	Courthouse Room 200
2014 Section 85.21 grant application, BRT Presentation	Transportation, Public Works and Transit Committee	Public Hearing	3/2/2016	Room 201B

Milwaukee County Transit System 2017 Limited English Proficiency Plan

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I. Introduction

Per 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.

<http://www.dotcr.ost.dot.gov/asp/lep.asp>

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

<http://www.lep.gov/resources/selfassesstool.htm>

Limited English Proficiency – A Federal Interagency Website

http://dwd.wisconsin.gov/det/civil_rights/participant_guide_06/crc_subject_matter_reference.pdf

Civil Rights Compliance in Service Delivery Training: Subject Matter Reference Guide.

<http://www.lep.gov/ISpeakCards2004.pdf>

Printable version of US Census “I Speak Cards”.

III. LEP Needs Assessment: Four-Factor Analysis

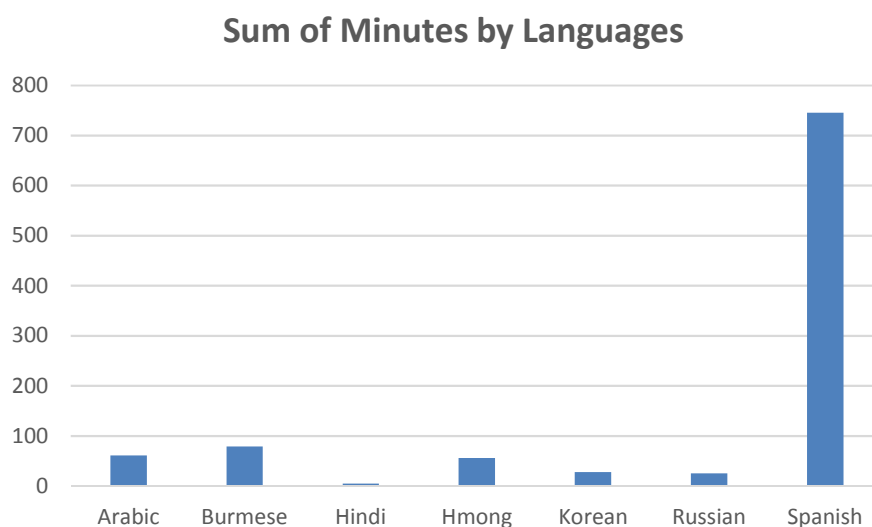
The Title VI Plan submitted in 2014 contained a plan for conducting the four-factor analysis to assist in understanding and addressing the needs of the LEP population. This comprehensive analysis was initiated in 2009 and updated to its present form in 2017. The following information outlines the progress of that analysis and presents the findings that resulted:

A. **FACTOR 1: The number or proportion of LEP persons eligible to be served or likely to be encountered 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.

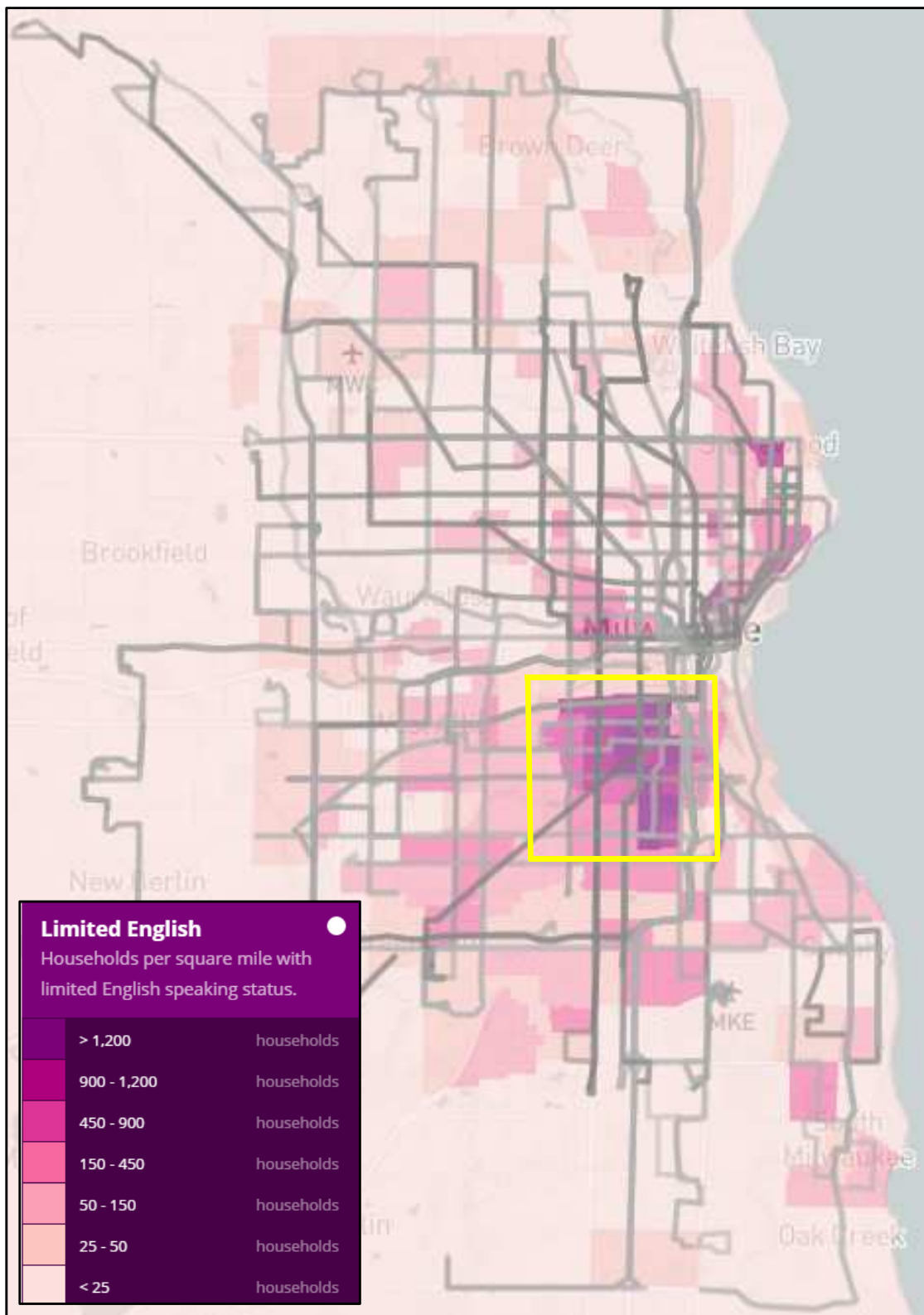
Results: *The analysis of past contact examined several areas of customer contact including Administration front desk, Information Center, Customer Service phone line, Paratransit office and Dispatch. All areas reported Spanish as the primary language used by LEP customers. Below is a graph of our Foreign Language Interpretation Service Usage reporting from Certified Languages International (November 2013 through March 2017).*



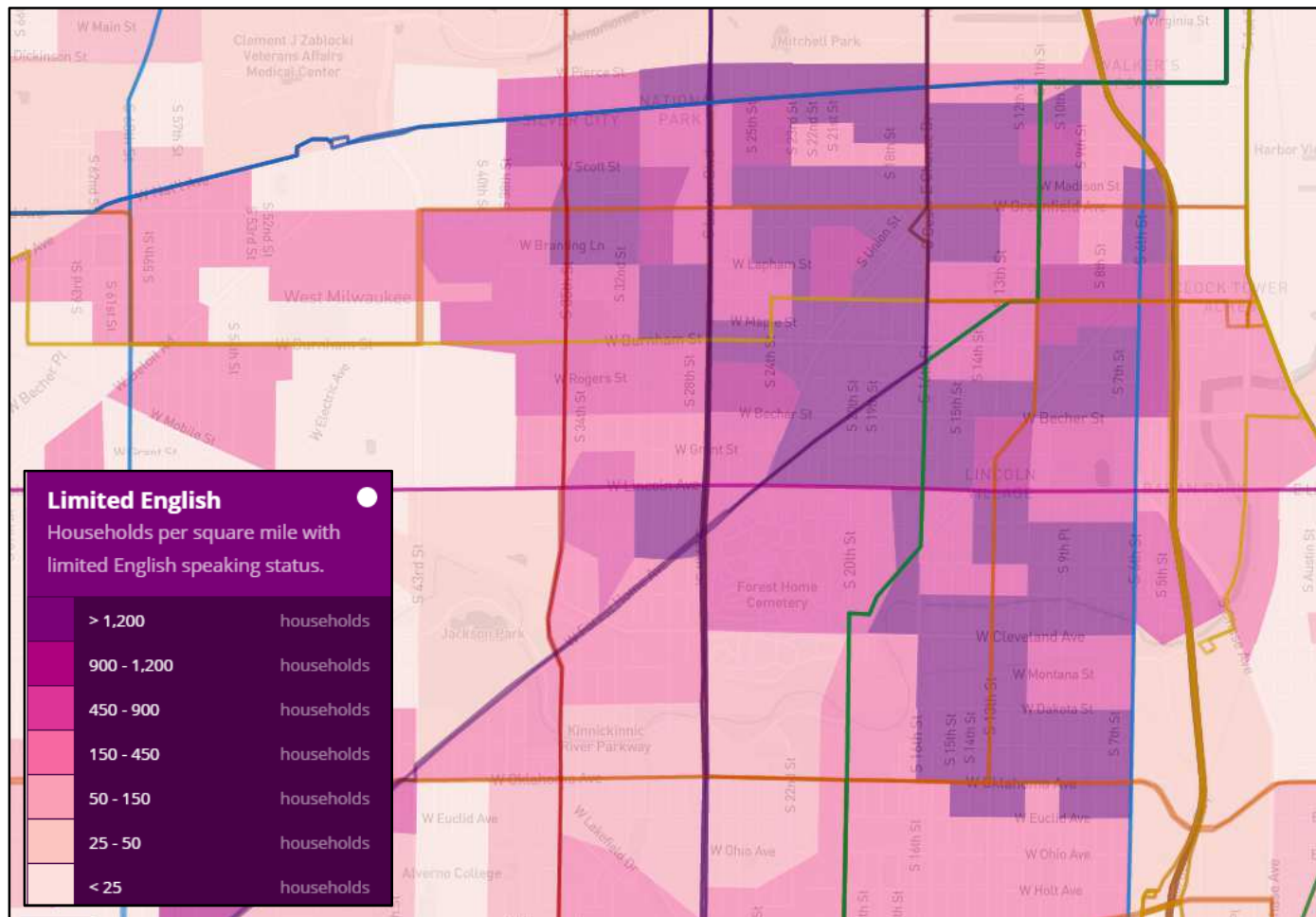
b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language

Results: *Below are maps of Milwaukee County identifying LEP Households per Square Mile in the MCTS Service Area (Milwaukee County) and a map focusing on the Highest Concentration of LEP households in the MCTS Service Area. 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 a breakdown of most prevalent LEP spoken languages in Milwaukee County.*

MCTS Service Area (Milwaukee County) with LEP Households per Square Mile



Highest Concentration of LEP Households in MCTS Service Area (Milwaukee County)



These maps were generated with a new Transit Planning software called Remix. The software allows MCTS’ Planning Department to effectively analyze transit service provision to all population groups as it displays various Census Data layers 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 pertinent schedule data of the new service. The use of Remix in our Public Participation efforts to LEP populations has the potential to enhance communication of service changes and may provide the opportunity for MCTS to efficiently cost-out any service changes within these communities.

**Languages Spoken at Home and Ability to Speak English
for the Population 5 Years and Over for Milwaukee County, WI: 2009-2013**

Release Date: October 2015

Language	Number of speakers ¹	% of Total Population 5 Years and Over	% of Total LEP Population
Population 5 years and over	881,215	100.00%	-
Speak only English at home	738,958	83.86%	-
Speak a language other than English at home	142,257	16.14%	100.00%
Spanish	88,015	9.99%	61.87%
Hmong	10,318	1.17%	7.25%
German	4,260	0.48%	2.99%
Arabic	4,224	0.48%	2.97%
French	2,420	0.27%	1.70%
Chinese	2,360	0.27%	1.66%
Russian	2,337	0.27%	1.64%
Laotian	2,333	0.26%	1.64%
Polish	1,889	0.21%	1.33%
Hindi	1,708	0.19%	1.20%
Italian	1,537	0.17%	1.08%
Vietnamese	1,343	0.15%	0.94%
Tagalog	1,251	0.14%	0.88%
Urdu	1,210	0.14%	0.85%
Albanian	1,115	0.13%	0.78%

Notes:

¹ Detailed-language estimates are rounded to the nearest multiple of five. Aggregate estimates (bold-face entries) are unrounded and appear in table B16001 (http://factfinder.census.gov/bkmk/table/1.0/en/ACS/13_5YR/B16001/0500000US55079). Detailed-language estimates may not sum to aggregate estimates because of rounding.

² N.E.C. stands for not elsewhere classified. These are languages where respondents indicated they spoke either Indian or Pakistan. For Indian, it cannot be determined if the respondent spoke a native American language or spoke a language from India. For Pakistan, respondents wrote in Pakistan but it cannot be determined which one of the languages spoken in Pakistan is actually being spoken. To distinguish these languages, n.e.c. is used to indicated they are not classified in any other language code.

Source: U.S. Census Bureau, 2009-2013 American Community Survey

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

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

Results: *The Marketing Department gave presentations and/or was available to answer questions with the following community groups:*

Lindsay Heights Community Planning Council
 Osher Learning Institute
 Social Development Commission
 City of Milwaukee Family Day of Health (English as a Second Language)
 2015 Mexican Fiesta

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: *The assessors use the foreign language interpretation service with each LEP customer.*

PARATRANSIT (NEW FREEDOM): *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. IIW also provides Sensitivity Training to MCTS operators as a result of this partnership.*

DISPATCH: *When an operator needs to interact with a Spanish-speaking LEP person, they call Dispatch for assistance. If available, a Spanish-speaking Route Supervisor is asked to arrive at the scene. No other accommodations are available at this time.*

HUMAN RESOURCES/RECEPTION AREA: *The Administrative building receptionist estimates interactions with ten LEP customers who need assistance each year. He transfers them to Customer Service if it's a phone call. In the past, the receptionist has asked a Spanish-speaking MCTS Administration employee to*

assist with Spanish-speaking customers, but since the implementation of the foreign language interpretation service, those requests have diminished. 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: *The Customer Service Supervisor estimated that she has used the Foreign Language Interpretation Service 17 times since April 2014. Most often, a Spanish-speaking interpreter is requested, but their department has received customer service inquiries in Hmong and Arabic. Having the Interpretation Service at their disposal is a great comfort to the Customer Service staff.*

MARKETING: *They provide several presentations each year to community groups with LEP populations. In 2015, they had a booth at Mexican Fiesta to inform people about the GO Pass and M-Card. Also, in February 2016, they provided a special Spanish edition of BusLines to inform customers of our transition to a paperless fare system. This BusLines edition was made available to operators of routes serving areas of Milwaukee County with high LEP density.*

b) Ridership Surveys

Results: *MCTS has not distributed LEP-related surveys since 2014. Two of four community-based organizations indicated in 2014 that their clientele rarely inquired about or expressed a need for transit. In contrast, one organization reported frequent use of 5 of the 11 routes that service the Spanish- language LEP population concentration area. Survey response rates among the four organizations varied from a low of 23% to a high of 75%. Transit usage among survey respondents ranged from a low of 36% to a high of 79%.*

Each community organization provided insight into engaging with the LEP population. A Spanish-language questionnaire was the preferred method of engagement. As a result, 650 surveys were distributed by partner organizations with just over half completed and returned. Among the completed surveys, nearly half were from individuals who use MCTS service. Open-ended questions related to MCTS service covered the following topic areas:

- *General transit usage*
- *Routes/schedules*
- *Communications materials*
- *Fares/tickets*
- *Safety & security*

Based on input from community organizations, focus groups were not utilized. Instead only surveys were used. In addition to distribution of the Spanish language questionnaire by the community organizations, MCTS distributed the same survey directly. The response rate was significantly less using this method of distribution than the response to the community organization issued survey.

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 prevent 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: *Further analysis needs to be carried out on the effectiveness of Spanish-language random Public Service Announcements—currently, these are only played in English throughout the system. When MCTS' most critical services were reviewed in 2014 for critical LEP deficiencies, staff identified the following areas as critical to using transit services with ease.*

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 of behavior including:

- *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: *MCTS has sought and received minimal input from community organizations and LEP persons since 2014. When MCTS did receive input in 2014, this is what was found:*

Printed schedules are a primary source of information and yet pose a consistent obstacle for LEP persons. A detailed How to Ride Guide in Spanish was produced and distributed to Spanish Community Centers.

Use of the website and information phone line continues to be minimal among LEP persons.

An understanding of fares and appropriate usage of fare media does not appear to be an issue area for LEP persons. However, this information is detailed in the How to Ride Guide. Additionally, all buses have detailed fare information in Spanish.

The passenger Bill of Rights is posted in Spanish on all buses.

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:*

- *Bienvenido – Spanish How to Ride Guide - a more expansive general brochure explaining how to ride the bus. At a cost of approximately \$8,000 for 20,000 brochures, this item was distributed in display racks throughout the community and sent to community groups. This brochure will be revised to include updated information about the new fare system.*
- *Transit Guide – has Spanish information explaining what and where to get the Spanish How to Ride Guide. It also has information in Spanish on*

how to file a Title VI complaint. Cost: just translation – roughly \$100 – since this is a collaborative piece.

- *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*
- *On board How to Make a Title VI complaint – Cost approximately \$900*
- *Safety tips card that provided bus rules and traveling tips. It was distributed on buses in 2007 under the “See Something, Say Something” security campaign at a cost of approximately \$4,000 for 10,000 cards.*

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.*

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. It should be noted that the community groups who assisted us with distributing the surveys were asked for translating assistance. All stated that they do not have the time and/or resources to assist with this.*

Currently, there is not a separate account dedicated to addressing the identified LEP needs. However, MCTS has ensured funds are directed for this purpose and will continue to allocate funds, as needed for continued LEP improvements. MCTS will monitor and dedicate resources as needed.

d) Consider cost effective practices for providing language services

Results: *Prior to November 2013, the extent of MCTS' foreign language interpretation capability was one employee in the administration building handling infrequent Spanish-speaking customer service calls as a side duty whenever needed. No other employee had significant foreign language skills, a problem when a customer with limited English proficiency needed our services at any of our stations or the administration building.*

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.

One of the resources MCTS can use is a PowerPoint presentation developed by the FTA Office of Civil Rights, available at

http://www.fta.dot.gov/civilrights/title6/civil_rights_5102.html

Other resources include:

www.lep.gov

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

<http://www.fhwa.dot.gov/hep/lowlim>.

“Guidelines for Developing Traffic Safety Educational Materials for Spanish-Speaking Audiences,” available at

<http://www.nhtsa.dot.gov/people/injury/airbags/TESM/index.htm>

c) Providing Notice to LEP Persons

MCTS will explore and analyze the need for additional signage on its buses and major transfer locations to improve our provision notice to LEP persons.

Additionally, MCTS will explore the 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.

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:

- Brochure: “Bienvenido” in Spanish - A general informational brochure was developed and distributed at informational racks throughout the service area.

- Planning Surveys: On-board customer surveys have been translated into Spanish. These surveys, written in English on one side and Spanish on the other, are designed to obtain customer feedback in order to improve overall effectiveness of bus service.
- 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
- Survey of Spanish speaking customers – A survey was conducted to nearly 400 Spanish-speaking individuals through community groups.
- 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.
- After Office Hours – If an individual requires language assistance after the office is closed, Dispatch office is notified and they may then contact the local police department to request assistance. Currently, this is an infrequent occurrence and relatively informal. Therefore, there is no cost associated with this effort.
- Bilingual Instructions – MCTS added bilingual (English and Spanish) instructional decals on-board the buses. Examples include a notice to give up seats for a passenger who is disabled and how to use the bicycle rack.
- Internal Surveys - MCTS staff has prepared an internal web-based survey for future tracking/monitoring of contacts of LEP individuals MCTS is prepared to the address additional measures previously noted that would allow for continued success in providing meaningful access to LEP populations.
- In November 2013, MCTS partnered with Certified Languages International to enable any MCTS employee to utilize translation services in order to improve our ability to assist LEP customers. To date, we have logged almost 1,000 minutes and spent over \$1,100 on foreign language interpretation services over the phone. This includes serving people of seven-different foreign languages: Arabic, Burmese, Hindi, Hmong, Korean, Russian and Spanish.
- The new www.RideMCTS.com is available in dozens of languages, powered by Google Translate.
- In February 2016, Marketing translated and printed brochures related to the transition to paperless fares and distributed them on routes serving high-density LEP populations.

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
Interoffice Memorandum**

To: File

From: Andy Tillman, Transit Planner II

Subject: **TPAC and TSAC Ethnic Makeup**

Date: March 31st, 2017

Below are the ethnic backgrounds of both the Transit Plus Advisory Committee (TPAC) and the Transit Services Advisory Committee (TSAC) members and their respective selection processes for membership.

Transit Plus Advisory Committee:

Name	Race
Grace Graves	White
Arlene Conley	White
Laurel Henschel	White
Troy Hergert	White
Martha Chambers	White
Estella Brown	African American
Robert Gebel	White
Richard Wyble	White
Deanna Tapio	White
Jenine Caldwell	African American
Marcia Perkins	African American
Jeanette Williams	African American

TPAC Membership Selection Criteria:

Article III, Section 3 of TPAC's Bylaw state that TPAC shall reflect the diverse consumer interests which comprise the program. The appointees shall:

- a. Have a variety of functional needs and abilities
- b. Utilize different primary modes of transportation (vans, taxis, fixed route buses)
- c. Have different categories of eligibility
- d. Reside in different areas of Milwaukee County
- e. Use the service during peak and non-peak hours
- f. Approximate the age, cultural background, racial diversity, and socio-economic status reflective of program constituents.

Transit Services Advisory Committee:

Name	Race
Joyce Tang-Boyland	Asian
Jeramey Janenne	White
Patricia Lidicker	White
Andrew Haug	White
Cheri McGrath	White
Denise Koss	White

TSAC Membership Selection Criteria:

Members of the Transit Service Advisory Committee are appointed to the committee by the Milwaukee County Board of Supervisors' Chairperson. The county board will also appoint a County Supervisor to serve as an ex-officio member. Each term is limited to up to three two-year terms.

County of Milwaukee
Interoffice Communication

DATE: March 31, 2017
TO: Tom Winter, Director of Schedule and Planning, MCTS
FROM: John Rodgers, Senior Manager Grants Compliance, MCDOT
SUBJECT: Milwaukee County Monitoring of Subrecipient Title VI Programs for the Federal Transit Administration Section 5310 Program within the Milwaukee Urbanized Area.

POLICY

This report is for informational purposes only.

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 21st 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. Milwaukee County provides sample materials and technical assistance to subrecipients in developing a compliant Title VI Program.
- **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.

RECOMMENDATION

This report is for informational purposes only.

Prepared by: John Rodgers, Senior Manager Grants Compliance, MCDOT

County of Milwaukee
Interoffice Communication

DATE: 5/11/2017
TO: Theodore Lipscomb, Sr., Chairman, County Board of Supervisors
FROM: Brian Dranzik, Director, Department of Transportation
SUBJECT: Resolution Approving of Milwaukee County Transit System (MCTS) 2017 Title VI Program Plan Update

POLICY

Title VI of the Civil Rights Act of 1964 states: “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.”

BACKGROUND

The Federal Transit Administration (FTA) requires transit providers prepare a Title VI Program Plan Update every three years to document compliance. The last program plan update was prepared and approved in 2014. The purpose of the Title VI Program 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.

The FTA requires approval of the Title VI Program Plan Update by the County Executive and the County Board prior to the submittal deadline of October 1, 2017. The MCTS 2017 Title VI Program Plan Update is available at: <https://www.ridemcts.com/about-mcts/title-vi>

The MCTS 2017 Title VI Update includes:

- An updated Public Participation Plan with an emphasis on outreach to minority populations.
- Updated Limited English Proficiency Plan, which describes language assistance efforts that will be used to engage with populations that have limited proficiency in the English language.
- A demographic analysis of transit services provided in 2014, 2015, and 2016 including maps.
- Demographic Ridership and Travel Patterns study (2016).
- A description of system-wide service standards and policies, and monitoring thereof.
- An analysis of major service changes and fare changes.

MCTS carefully analyzes the impacts of service and fare changes on minority, and low-income populations. The Title VI Program Plan Update is inclusive of the analyses conducted in the past three years, and identifies efforts and actions taken to mitigate unintended impacts on minority populations or disproportionate burdens on low-income individuals. Examples of the analyses included in the 2017 Program Plan Update follow:

- In 2015, MCTS reduced the number of transit fare media outlets because of the added convenience of M-Card on-line. To mitigate impacts on minority populations and a disproportionate burden on low-income populations MCTS reviews the distribution of M-Card Recharge Units throughout the County and seeks to site new units in minority, and low-income census tracts when feasible.

- In 2015, as GO Pass was being implemented, the Southeastern Wisconsin Regional Planning Commission (SEWRPC) evaluated the program and found no disparate impact or disproportionate burden from the program as long as fares do not need to be raised as a result of providing free fares to seniors and people with disabilities. In 2017, some MCTS fares were increased; however, GO Pass eligibility criteria were also modified to focus on low-income populations.
- In 2017, Freeway Flyer fares were increased as well as the cost of 7-day and 31-day passes. Surveys showed that the MCTS 7-day pass is used disproportionately by minority populations; therefore, the percent increase in the cost of the 7-day pass was reduced in comparison to the percent increase for other fares to mitigate its impact.
- In 2016, Route 279 service ended due to low ridership. Although the service was used by minority, and low-income passengers, the availability of other routes funded by the Zoo Litigation Settlement in the same geographic area with a similar purpose mitigates unintended disparate impacts on minority populations and any disproportionate burden on low-income populations.

FISCAL EFFECT

There is no Fiscal Impact from approving of the MCTS 2017 Title VI Program Plan Update.

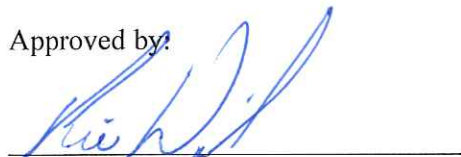
RECOMMENDATION

Approve MCTS 2017 Title VI Program Plan Update.

Prepared by:

Dan Boehm, President & Managing Director, MCTS

Approved by:



Brian Dranzik

Director, Department of Transportation

cc: Chris Abele, County Executive
 Michael Mayo, Sr., Chairperson, Transportation, Public Works & Transit Committee
 Raisa Koltun, Chief of Staff, County Executive
 Kelly Bablitch, Chief of Staff, County Board of Supervisors
 Steve Kreklow, Budget Director, DAS - PSB
 Steve Cady, Research Director, Office of the Comptroller
 Jonathan Schatz, Fiscal and Budget Analyst, DAS-PSB

1
2
3 From the Director, Department of Transportation, requesting approval of the Milwaukee
4 County Transit System's 2017 Title VI Program Plan Update, by recommending
5 adoption of the following:
6

7 **A RESOLUTION**
8

9 WHEREAS, Title VI of the Civil Rights Act of 1964 states: "No person in the
10 United States shall, on the ground of race, color, or national origin, be excluded from
11 participation in, be denied the benefits of, or be subjected to discrimination under any
12 program or activity receiving federal financial assistance;" and
13

14 WHEREAS, the Federal Transit Administration (FTA) requires transit providers
15 prepare a Title VI Program Plan Update (the Plan) every three years to document
16 compliance; and
17

18 WHEREAS, the purpose of the Plan is to ensure that transit services are
19 provided in a non-discriminatory manner, to promote full and fair participation in transit
20 decision-making without regard to race, color, or national origin, and to ensure
21 meaningful access to transit-related programs and activities by persons with limited
22 English proficiency; and
23

24 WHEREAS, the FTA requires approval of the Plan by the Milwaukee County
25 Executive and the Milwaukee County Board of Supervisors prior to the submittal
26 deadline of October 1, 2017; and
27

28 WHEREAS, the Committee on Transportation, Public Works, and Transit, at its
29 meeting of June 7, 2017, recommended adoption of File No. 17-431 (vote 5-0); now,
30 therefore,
31

32 BE IT RESOLVED, the Milwaukee County Transit System (MCTS) 2017 Title VI
33 Program Plan Update (the Plan), which is available at [https://www.ridemcts.com/about-](https://www.ridemcts.com/about-mcts/title-vi)
34 [mcts/title-vi](https://www.ridemcts.com/about-mcts/title-vi), is approved and MCTS is authorized to submit the approved Plan to the
35 Federal Transit Administration.
36

37
38 srb
39 06/07/17
40 U:\Committees\2017\Jun\TPWT\Resolutions\17-431 MCTS Title VI.docx

**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:

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"> 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 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 c. Local shuttle services designed to connect with rapid, express, and local services serving major activity centers d. Paratransit service designed to meet the needs of people with disabilities who are unable to use accessible mainline bus service 	<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"> a. Housing facilities serving transit-dependent persons who are living independently including elderly persons, people with disabilities, and low-income individuals b. Principal hospitals and medical centers c. Major retail shopping malls d. Principal colleges and universities e. Major Federal, State, and local governmental offices and institutions f. Major employers with more than 500 employees at one site g. Major industrial and office parks h. Major passenger terminals for intercity bus, passenger rail, and airline carriers i. Major public and private recreational centers hosting high attendance events 	<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	--	
		<u>Service Type</u>	<u>Walking</u>	<u>Driving</u>											
		Rapid	1/2 Mile	3 Miles											
Express	1/2 Mile	--													
Local	1/4 Mile	--													
<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>						
<u>Service Type</u>	<u>Distance from a Bus Stop</u>														
Rapid	1/2 Mile														
Express	1/2 Mile														
Local	1/4 Mile														
<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"> a. Within 45 minutes overall transit travel time of 40 percent of the jobs in the urbanized area b. Within 35 minutes overall transit travel time of a major shopping mall c. Within 40 minutes overall transit travel time of a major college or university d. Within 30 minutes overall transit travel time of a major hospital or medical center e. Within 40 minutes overall transit travel time of a major Federal, State, or local governmental office or public institutional center f. Within 60 minutes overall transit travel time of a major passenger terminal for an intercity bus, passenger rail, or airline carrier g. Within 60 minutes overall transit travel time of a major public or private recreational center hosting high attendance events 	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"> 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. 2. Rapid and express transit routes should be extended as needed to perform a collection-distribution function at the ends of the route 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 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="673 898 1240 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> <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> <p style="text-align: center;"><u>Travel Speed (miles per hour)</u></p> <table border="1" data-bbox="673 1144 1031 1249"> <thead> <tr> <th><u>Service Type</u></th> <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> <ol style="list-style-type: none"> 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: <p style="text-align: center;"><u>Desirable Service Hours</u></p> <table border="1" data-bbox="673 1375 1209 1480"> <thead> <tr> <th><u>Service Type</u></th> <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> 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. 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 area⁹ 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. <p style="text-align: center;"><u>Desirable Headway (minutes)</u></p> <table border="1" data-bbox="673 1753 1039 1879"> <thead> <tr> <th rowspan="2"><u>Service Type</u></th> <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>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>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	<u>Service Type</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.	<u>Service Type</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	<ol style="list-style-type: none"> 1. -- 2. -- 3. -- 4. -- 5. -- 6. -- 7. -- 8. --
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Table 32 (continued)

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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="673 310 1240 436"> <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 1240 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.^b 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.^c</p> <p>3. The minimum service effectiveness levels to warrant continued service operation shall be as specified below, unless special circumstances warrant otherwise^c:</p> <table border="1" data-bbox="673 1375 1240 1480"> <thead> <tr> <th>Service Period</th> <th>Total Boarding Passengers Per Revenue Vehicle Hour</th> </tr> </thead> <tbody> <tr> <td>Weekdays</td> <td>22^e</td> </tr> <tr> <td>Saturdays</td> <td>15^e</td> </tr> <tr> <td>Sundays/Holidays</td> <td>10^e</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 1240 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 ^e	Saturdays	15 ^e	Sundays/Holidays	10 ^e	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^d</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>
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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> 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 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 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. 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><u>Service Performance Standards</u></p> 1. The number of accidents on the public transit system should be minimized 2. The number of security incidences on transit property should be minimized	1. -- 2. -- 3. -- 4. -- 1. The number of accidents on the transit system per 100,000 vehicle miles of service 2. The number of security incidences on the transit system per 100,000 vehicle miles of service
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> 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 2. The amount of highway system capacity which must be provided to serve travel demand should be minimized	1. Passenger miles per gallon of motor fuel 2. Potential increase in vehicle traffic on surface streets if transit trips use automobile
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> 1. The total operating and capital investment for the public transit system should be minimized and reflect efficient utilization of resources 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 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 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	1. -- 2. -- 3. -- 4. --

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^c. 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>

^aThe "core service area" for the transit system is the area bounded by Capitol Drive on the north, Oklahoma Avenue on the south, 76th Street on the west, and Lake Michigan on the east.

^bPotential 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		

^cA 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.

^dThe 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.

^eDuring 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**

DATE: January 28, 2016

TO: File

FROM: Andy Tillman

SUBJECT: 2014 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

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 2014 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 – 2014 Weekday Average Maximum Load Factors). 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 fall 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 – 2014 Weekday, Saturday, or Sunday Average Headways for Regular Routes).

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 2014 shows that service fell below this standard monthly (see table – 2014 MCTS System On-Time Performance).

Distribution of Transit Amenities – The supply and demand for transit service is measured according to the number of passenger per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see table – 2014 Weekday Bus Hours and PBH). 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 2014, 62% 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 routes 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 are able to purchase passes at several grocery stores, gas stations, and banks/credit unions.

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 (2014 – Average Hours of the Day Served on Weekdays). No route identified as serving minority areas receives less than a 19-hour span of service on Weekdays.

Service Policies

Vehicle Assignment – MCTS’s fleet is fairly standardized with regard to amenities. All 40-foot vehicles are standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count). All vehicles are available for use on any route, and are assigned in no particular order.

Transit Security – In addition to the oversight provided by the Manager of Security and Street Operations, the primary security-related support to on-bus incidents is provided by a private security firm contracted by MTS. G4S Secure Solutions Inc. employs over 30 Custom Protection Officers (CPOs) and provides more than 1,360 hours of weekly service, of which about 70% of weekday hours are spent riding buses. Contract Security managers and the Manager of Security and Street Operations work together to assign priority for bus riding to

the routes and times of day where the 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 mapped and graphed to aid the security team in the development of sound security deployment strategies.

Beyond the coordination with security and law enforcement, several additional measures are taken to ensure a safe environment for both employees and passengers. The Manager of Security and Street Operations meets monthly with representatives from the operator's union and management to address and discuss security issues. To deter and detect criminal activity, there are four security cameras (both video and audio) installed on every bus, and MCTS partnered with the Milwaukee Police Department to secure a grant to install over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but purchased through a Transit Security Grant.

The Manager of Security and Street Operations trains all new operators in safe passenger interaction techniques and conflict communication skills. New operators also receive training on suspicious activity recognition through nationally recognized "Transit Watch" program. This program is aimed to raise passenger and employee awareness of suspicious persons, activity and potential threats to our transportation infrastructure. Campaign materials were funded through a Transit Security grant and are available in both English and Spanish as well as on the website.

2014 Title VI Route Evaluation

Weekday Average Maximum Load Factors For Regular Routes During AM and PM Peak Periods

Rte	Name	Category	Load	Load	AM	PM
			Factor	Factor		
			AM	PM		
Minority						
RED	Capitol Drive	Minority	0.86	0.69	30	24
BLU	Fond du Lac - National	Minority	0.66	0.83	23	29
12	Teutonia - Hampton	Minority	0.60	0.66	21	23
14	Forest Home	Minority	0.57	0.74	20	26
19	M.L. King/S.13th & S. 20th	Minority	0.66	0.71	23	25
21	North Avenue	Minority	0.51	0.60	18	21
22	Center Street	Minority	0.60	0.60	21	21
23	Fond du Lac- National	Minority	0.66	0.77	23	27
27	27th Street	Minority	0.57	0.69	20	24
30	Sherman - Wisconsin	Minority	0.74	0.80	26	28
31	State - Highland	Minority	0.40	0.49	14	17
33	Vliet Street	Minority	0.40	0.43	14	15
35	35th Street	Minority	0.51	0.63	18	22
54	Mitchell - Burnham	Minority	0.46	0.43	16	15
57	Walnut - 92nd	Minority	0.46	0.51	16	18
60	Burleigh Street	Minority	0.60	0.66	21	23
62	Capitol Drive	Minority	0.43	0.54	15	19
63	Silver Spring Drive - Port Washington	Minority	0.51	0.60	18	21
67	N. 76th - S. 84th	Minority	0.60	0.57	21	20
76	N. 60th - S. 70th	Minority	0.54	0.63	19	22
80	6th Street	Minority	0.54	0.54	19	19
Group Average			0.57	0.62		
Non-Minority						
GRE	Bayshore - Airport	Non-Minority	0.66	0.74	23	26
10	Humboldt - Wisconsin	Non-Minority	0.69	0.71	24	25
15	Holton - Kinnickinnic	Non-Minority	0.49	0.66	17	23
28	108th Street	Non-Minority	0.23	0.29	8	10
51	Oklahoma Avenue	Non-Minority	0.54	0.49	19	17
52	Clement - 15th Ave	Non-Minority	0.29	0.31	10	11
53	Lincoln Avenue	Non-Minority	0.49	0.43	17	15
55	Layton Avenue	Non-Minority	0.43	0.37	15	13
56	Greenfield Avenue	Non-Minority	0.43	0.49	15	17
64	S. 60th Street	Non-Minority	0.20	0.14	7	5
Group Average			0.44	0.46		

Maximum loads are based on the average of the maximum number of people aboard each trip from 6a-9a or 3p-6p in the peak direction from APC route trip list report data for Fall of 2014.

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)

2014 Title VI Route Evaluation Weekday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	15	18	14	26	33
BLU	Fond du Lac - National MetroEXpress	22	23	18	26	38
12	Teutonia-Hampton	9	11	11	18	20
14	Forest Home	20	20	21	24	33
19	ML King - S. 13th/S. 20th	15	16	18	16	23
21	North Avenue	18	17	12	18	29
22	Center Street	17	18	16	23	30
23	Fond du Lac- National	22	24	19	29	38
27	27th Street	14	11	10	17	23
30	Sherman - Wisconsin	8	9	10	14	17
31	State - Highland	22	23	26	24	27
33	Vliet Street	35	36	35	26	25
35	35th Street	17	22	17	24	31
54	Mitchell - Burnham	31	27	29	30	29
57	Walnut - Lisbon	24	26	27	28	44
60	Burleigh Street	18	21	19	21	32
62	Capitol Drive	22	18	16	21	33
63	Silver Spring - PT. Washington	24	26	26	24	45
67	N. 76th - S. 84th	17	22	18	23	38
76	N. 60th - S. 70th	17	18	16	28	36
80	6th Street	14	15	13	22	28
Group Average		19	20	19	23	31
GRE	Oakland-Howell MetroEXpress	13	13	12	18	26
10	Humboldt - Wisconsin	17	19	17	24	32
15	Holton - Kinnickinnic	22	22	23	22	32
28	108th Street		29	29	54	
51	Oklahoma Avenue	25	22	20	28	31
52	Clement - 15th Avenue	41	43	45	74	85
53	Lincoln Avenue	19	30	15	27	40
55	Layton Avenue	27	26	27	31	45
56	Greenfield Avenue	27	25	29	35	45
64	S. 60th Street	43	42	44		
Group Average		26	27	29	35	42

Data is for Fall of 2014 service from 2014 MCTS Annual Ridership Statistics Book

2014 Title VI Route Evaluation Saturday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	31	26	27	32	43
BLU	Fond du Lac - National MetroEXpress	38	30	29	37	47
12	Teutonia-Hampton	29	21	17	20	31
14	Forest Home	34	30	31	35	31
19	ML King - S. 13th/S. 20th	20	20	21	25	31
21	North Avenue	19	18	19	24	30
22	Center Street	26	23	23	21	28
23	Fond du Lac - National	34	30	29	38	50
27	27th Street	17	15	14	14	28
30	Sherman - Wisconsin	14	12	12	17	19
31	State - Highland	40	31	28	40	49
33	Vliet Street	28	30	31	30	29
35	35th Street	31	25	22	28	29
54	Mitchell - Burnham	43	45	45	41	42
57	Walnut - Lisbon	46	33	32	30	35
60	Burleigh Street	43	18	18	23	32
62	Capitol Drive	29	26	30	33	38
63	Silver Spring - PT. Washington	32	25	25	23	30
67	N. 76th - S. 84th	62	35	33	38	41
76	N. 60th - S. 70th	26	20	21	29	32
80	6th Street	28	22	23	35	34
Group Average		32	25	25	29	35
Non-Minority						
GRE	Oakland-Howell MetroEXpress	24	20	19	22	28
10	Humboldt - Wisconsin	30	30	30	29	34
15	Holton - Kinnickinnic	33	31	29	34	45
28	108th Street	52	54	53	52	
51	Oklahoma Avenue	28	28	29	41	39
52	Clement - 15th Avenue	40	42	42	56	79
53	Lincoln Avenue	41	43	43	39	38
55	Layton Avenue	45	35	36	33	32
56	Greenfield Avenue	45	25	30	32	44
64	S. 60th Street	62	62	62		
Group Average		38	34	37	38	42

Data is for Fall of 2014 service from 2014 MCTS Annual Ridership Statistics Book

2014 Title VI Route Evaluation Sunday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	32	26	25	30	46
BLU	Fond du Lac - National MetroEXpress	48	39	36	39	68
12	Teutonia-Hampton	28	18	17	19	29
14	Forest Home	30	29	29	34	32
19	ML King - S. 13th/S. 20th	25	22	24	25	33
21	North Avenue	30	21	20	25	30
22	Center Street	29	22	22	22	30
23	Fond du Lac-National	49	39	37	38	65
27	27th Street	20	16	17	21	26
30	Sherman - Wisconsin	25	18	14	18	26
31	State - Highland	45	29	27	38	52
33	Vliet Street	26	30	31	28	26
35	35th Street	32	24	21	32	29
54	Mitchell - Burnham	41	45	44	42	42
57	Walnut - Lisbon	40	32	32	29	39
60	Burleigh Street	39	18	18	26	34
62	Capitol Drive	30	32	34	38	42
63	Silver Spring - PT. Washington	32	26	25	32	50
67	N. 76th - S. 84th	60	32	32	34	40
76	N. 60th - S. 70th	34	26	27	33	31
80	6th Street	26	22	22	34	35
Group Average		34	27	26	30	38
Non-Minority						
GRE	Oakland-Howell MetroEXpress	30	25	25	24	40
10	Humboldt - Wisconsin	29	29	28	27	39
15	Holton - Kinnickinnic	40	35	35	38	39
28	108th Street		54	54		
51	Oklahoma Avenue	36	29	28	40	39
52	Clement - 15th Avenue	42	41	42	62	79
53	Lincoln Avenue	40	42	42	41	41
54	Mitchell - Burnham	41	45	44	42	42
55	Layton Avenue	43	36	36	50	58
56	Greenfield Avenue	40	31	33	45	39
64	S. 60th Street	60	60	60		
Group Average		40	39	39	41	46

Data is for Fall of 2014 service from 2014 MCTS Annual Ridership Statistics Book

2014 MCTS System On-Time Performance Averaged by Day and Time

Month	Jan
2014	84.40%
	Feb
	83.40%
	Mar
	86.10%
	Apr
	86.30%
	May
	84.30%
	Jun
	84.00%
	Jul
	82.70%
	Aug
	82.30%
	Sep
	82.30%
	Oct
	83.60%
	Nov
	85.50%
	Dec
	86.00%

2014 Title VI Route Evaluation Weekday Bus Hours and PBH

<u>Rt</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>	<u>Passengers per bus hour</u>
Minority				
RED	Capitol Drive MetroEXpress	Regular	114	49
BLU	Fond du Lac - National MetroEXpress	Regular	160	42
12	Teutonia - Hampton	Regular	196	42
14	Forest Home	Regular	103	33
19	M.L.K - S. 13th/S. 20th	Regular	209	35
21	North Avenue	Regular	135	48
22	Center Street	Regular	73	55
23	Fond du Lac-National	Regular	173	33
27	27th Street	Regular	240	49
30	Sherman - Wisconsin	Regular	285	52
31	State - Highland	Regular	89	23
33	Vliet Street	Regular	39	23
35	35th Street	Regular	100	49
63	Silver Spring-Pt. Washington	Regular	70	49
54	Mitchell - Burnham	Regular	73	29
57	Walnut - Lisbon	Regular	72	21
60	Burleigh Street	Regular	93	46
62	Capitol Drive	Regular	71	38
67	N. 76th - S. 84th	Regular	128	33
76	N. 60th - S. 70th	Regular	175	36
80	6th Street	Regular	191	36
Group Average:			133	39
Non-Minority				
GRN	Oakland-Howell MetroEXpress	Regular	208	36
10	Humboldt - Wisconsin	Regular	176	38
15	Holton - Kinnickinnic	Regular	158	33
28	108th Street	Regular	52	19
51	Oklahoma Avenue	Regular	73	40
52	Clement-15th Ave.	Regular	33	14
53	Lincoln Avenue	Regular	71	27
55	Layton Avenue	Regular	51	30
56	Greenfield Avenue	Regular	69	37
64	S. 60th Street	Regular	28	16
Group Average:			92	29

Data is for Fall of 2014 service from 2014 MCTS Annual Ridership Statistics Book

2014 Title VI Route Evaluation
Average Hours of the Day Served on Weekdays

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

Hours of day Served = Time of last pull in subtracted from time of first pull out
 Data is from Fall of 2013 HASTUS Vehicle Schedule Overview

BUS DISTRIBUTION AND COUNT AS OF APRIL 30, 2014

	2002 New Flyer	2002 Gillig	2003 New Flyer	2004 New Flyer	2005 New Flyer	2006 New Flyer	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer
Fond du Lac Garage	4606, 4615, 4616, 4619,4621, 4622, 4628, 4631, 4639,		4700-4714			5000-5007	5100-5123		5300-5354	
146	9	0	15	0	0	8	24	0	55	0
Fiebrantz MCTS Buses 104 Oz Buses 5		1000-1004	4715-4728	4800-4829				5200-5234		5430-5454
109	0	5	14	30	0	0	0	35		25
Kinnickinnic Garage	4600-4638		4729-4750		4900-4914		5124-5189			5400--5429
148	15	0	22	0	15	0	66	0		30
Active Buses 403	24	5	51	30	15	8	90	35	55	55
MCTS Buses 398										

<u>Active Vehicles</u>	<u>Count</u>	<u>Length/Seats</u>
2000	0	40' / 39
2001	0	40' / 39
2002	24	40' / 39
1000-1005	5	40' / 37
4700-4750	51	40' / 39
4800-4829	30	40' / 39
4900-4914	15	40' / 39
5000-5007	8	40' / 39
5100-5169	90	40' / 39
5200-5234	35	40' / 39
5300-5354	55	40' / 39
5400-5454	55	40' / 39
5500-5534	35	40' / 35

<u>(Inactive)</u>	
Group 19:	37
Out of Service Buses:	37
Active MCTS 40' Buses:	398
Active Ozaukee 40' Buses:	5
Total Active Buses:	403
Out of Service Buses:	37
Contingency Fleet:	0
Grand Total:	440

**Milwaukee County Transit System
Interoffice Memorandum**

DATE: October 14, 2016

TO: File

FROM: Andy Tillman

SUBJECT: 2015 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

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 2015 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 – 2015 Max Loads and headway). 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 – 2015 Max Loads and headway).

On Time Performance - All operators are required to meet an on-time performance standard of being between one minute early and three 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 2015 shows that averaged 84.1% over the year (see table – 2015 MCTS System On-Time Performance).

Distribution of Transit Amenities – The supply and demand for transit service is measured according to the number of passenger per bus hour (PBH) on a route. The application of this measure to the system produces an

equitable distribution of bus hours (see table – 2015 Weekday Bus Hours and PBH). While the passengers per bus hour is higher on route 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 2015, 58% 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 routes 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 are able to purchase passes at several grocery stores, gas stations, and banks/credit unions.

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 (2015 – Average Hours of the Day Served on Weekdays). No corridors identified as service minority areas receives less than a 19-hour span of service on Weekdays.

Service Policies

Vehicle Assignment – MCTS’s fleet is fairly standardized with regard to amenities. All 40-foot vehicles are standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count). All vehicles are available for use on any route, and are assigned in no particular order.

Transit Security – The Manager of Safety, Security and Risk Management coordinates all security and emergency related functions for MCTS and ensures its compliance with all local, state and federal security guidelines. She meets 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 AlliedBarton Security Services, a private security firm contracted by MTS. AlliedBarton employs 34 transit security officers and 2 on-site managers to provide more than 1,360 hours of weekly service. Transit Security officer response is available 24/7/365. With direction from the Manager of Safety, Security and Risk Management, AlliedBarton 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 Manager of Safety, Security and Risk Management meets 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 is currently replacing the 4-camera video/audio system on the buses with 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, will have 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 will record audio and video at all times that the bus is running. MCTS will be able to request video from any bus in the fleet and the video will automatically download to a central server once the bus pulls into the station. This system will be an excellent addition to the transit security program and we look forward to its full implementation.

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 is able to request video from these cameras at any time.

The Manager of Safety, Security and Risk Management trains all new operators in safe passenger interaction techniques and conflict communication skills. Through a 2015 Transit Security Grant, all MCTS employees will be trained on suspicious activity recognition and reporting. MCTS also participates in the FTA Transit Watch Program. This program is aimed to raise passenger and employee awareness of suspicious persons, activity and potential threats to our transportation infrastructure. Campaign videos and print material were funded through a Transit Security grant and are available on the website.

2015 Title VI Route Evaluation

Weekday Average Maximum Load Factors For Regular Routes During AM and PM Peak Periods

Rte	Name	Load		AM	PM
		Factor AM	Factor PM		
Minority					
RED	Capitol Drive	0.71	0.63	25	22
BLU	Fond du Lac - National	0.74	0.77	26	27
PUR	27th Street	0.60	0.71	21	25
12	Teutonia - Hampton	0.57	0.63	20	22
14	Forest Home	0.66	0.43	23	15
19	M.L. King/S.13th & S. 20th	0.66	0.66	23	23
21	North Avenue	0.46	0.37	16	13
22	Center Street	0.37	0.46	13	16
23	Fond du Lac- National	0.66	0.57	23	20
27	27th Street	0.43	0.43	15	15
30	Sherman - Wisconsin	0.77	0.63	27	22
30X	Sherman - Wisconsin	0.69	0.74	24	26
31	State - Highland	0.34	0.37	12	13
33	Vliet Street	0.31	0.31	11	11
35	35th Street	0.51	0.51	18	18
54	Mitchell - Burnham	0.37	0.37	13	13
57	Walnut - 92nd	0.40	0.40	14	14
60	Burleigh Street	0.63	0.54	22	19
61	Appleton Avenue	0.17	0.17	6	6
62	Capitol Drive	0.37	0.43	13	15
63	Silver Spring Drive - Port Washington	0.60	0.60	21	21
67	N. 76th - S. 84th	0.57	0.49	20	17
76	N. 60th - S. 70th	0.49	0.66	17	23
80	6th Street	0.57	0.54	20	19
Group Average		0.53	0.52	18.46	18.13
Non-Minority					
GRE	Bayshore - Airport	0.63	0.71	22	25
GOL	Wisconsin	0.69	0.49	24	17
15	Holton - Kinnickinnic	0.63	0.69	22	24
28	108th Street	0.26	0.23	9	8
51	Oklahoma Avenue	0.49	0.43	17	15
52	Clement - 15th Ave	0.26	0.20	9	7
53	Lincoln Avenue	0.46	0.40	16	14
55	Layton Avenue	0.40	0.37	14	13
56	Greenfield Avenue	0.40	0.46	14	16
64	S. 60th Street	0.26	0.17	9	6
276	Brown Deer Shuttle	0.06	0.03	2	1
Group Average		0.41	0.38	14.36	13.27

Maximum loads are based on the average of the maximum number of people aboard each trip from 6a-9a or 3p-6p in the peak direction from APC route for Fall of 2015.

2015 Title VI Route Evaluation

Weekday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	15	15	14	25	27
BLU	Fond du Lac - National MetroEXpress	21	23	21	27	40
PUR	27th Street	13	15	12	18	22
12	Teutonia-Hampton	9	11	11	18	20
14	Forest Home	19	21	19	32	27
19	ML King - S. 13th/S. 20th	14	18	17	15	23
21	North Avenue	19	19	15	18	25
22	Center Street	17	18	16	22	28
23	Fond du Lac- National	22	26	20	26	37
27	27th Street	21	21	22	29	36
30	Sherman - Wisconsin	22	21	21	27	19
30X	Sherman - Wisconsin	22	21	20	29	33
31	State - Highland	29	31	28	31	34
33	Vliet Street	34	34	36	28	27
35	35th Street	19	21	16	25	30
54	Mitchell - Burnham	30	30	30	31	28
57	Walnut - Lisbon	24	26	27	30	33
60	Burleigh Street	21	26	22	27	34
61	Appleton Avenue	19	20	19	24	29
62	Capitol Drive	19	20	19	24	29
63	Silver Spring - PT. Washington	26	25	26	24	40
67	N. 76th - S. 84th	17	20	15	25	32
76	N. 60th - S. 70th	16	20	19	28	32
80	6th Street	18	28	28	30	72
Group Average		20	22	21	26	32
Non-Minority						
GRE	Oakland-Howell MetroEXpress	13	15	12	18	22
GOL	Wisconsin	16	17	13	24	30
15	Holton - Kinnickinnic	22	23	23	24	29
28	108th Street	28	37	31	53	53
51	Oklahoma Avenue	33	47	24	33	36
52	Clement - 15th Avenue	42	43	47	59	84
53	Lincoln Avenue	21	35	22	25	31
55	Layton Avenue	36	38	39	36	45
56	Greenfield Avenue	30	27	27	29	45
64	S. 60th Street	42	40	38	36	34
276	Brown Deer Shuttle	30	30	30	30	30
Group Average		28	32	29	34	41

Data is for Fall of 2015 service from 2015 HASTUS Multiple Vehicle Schedule

2015 Title VI Route Evaluation

Saturday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	32	27	27	32	41
BLU	Fond du Lac - National MetroEXpress	37	35	29	35	43
PUR	27th Street	30	26	26	31	35
12	Teutonia-Hampton	38	28	24	31	41
14	Forest Home	36	30	28	35	40
19	ML King - S. 13th/S. 20th	26	34	22	25	28
21	North Avenue	24	31	20	23	31
22	Center Street	27	33	23	22	29
23	Fond du Lac- National	28	28	21	23	29
27	27th Street	31	36	26	45	57
30	Sherman - Wisconsin	28	25	26	28	23
30X	Sherman - Wisconsin	28	25	26	28	27
31	State - Highland	68	41	37	44	60
33	Vliet Street	28	30	30	29	29
35	35th Street	31	24	20	24	30
54	Mitchell - Burnham	38	31	42	43	42
57	Walnut - Lisbon	47	34	33	34	43
60	Burleigh Street	33	23	22	21	37
61	Appleton Avenue	32	25	24	31	30
62	Capitol Drive	29	26	29	35	33
63	Silver Spring - PT. Washington	35	28	26	23	33
67	N. 76th - S. 84th	62	38	34	36	42
76	N. 60th - S. 70th	27	22	20	26	36
80	6th Street	25	24	24	24	24
Group Average		34	29	27	30	36
Non-Minority						
GRE	Oakland-Howell MetroEXpress	29	20	19	21	26
GOL	Wisconsin	23	21	18	20	26
15	Holton - Kinnickinnic	35	34	31	34	38
28	108th Street	54	54	54	51	51
51	Oklahoma Avenue	33	35	48	51	42
52	Clement - 15th Avenue	40	42	44	60	79
53	Lincoln Avenue	38	41	41	39	37
55	Layton Avenue	39	36	36	33	44
56	Greenfield Avenue	39	33	33	37	41
64	S. 60th Street	56	56	56	56	
276	Brown Deer Shuttle	30	30	30	30	
Group Average		39	37	32	40	43

Data is for Fall of 2015 service from 2015 HASTUS Multiple Vehicle Schedule

2015 Title VI Route Evaluation

Sunday Average Headways for Regular Routes

<u>Rte</u>	<u>Name</u>	<u>AM_HW</u>	<u>MD_HW</u>	<u>PM_HW</u>	<u>EVE_HW</u>	<u>LN_HW</u>
Minority						
RED	Capitol Drive MetroEXpress	32	27	26	29	46
BLU	Fond du Lac - National MetroEXpress	47	40	40	38	63
PUR	27th Street	44	55	32	42	55
12	Teutonia-Hampton	28	17	17	22	31
14	Forest Home	30	29	28	31	29
19	ML King - S. 13th/S. 20th	28	25	23	24	38
21	North Avenue	34	23	21	26	32
22	Center Street	29	23	22	22	28
23	Fond du Lac- National	45	40	40	39	56
27	27th Street	45	31	31	70	77
30	Sherman - Wisconsin	25	25	26	25	27
30X	Sherman - Wisconsin		27	27	26	
31	State - Highland	50	30	26	35	50
33	Vliet Street	26	29	29	27	26
35	35th Street	30	24	20	24	30
54	Mitchell - Burnham	41	44	44	43	42
57	Walnut - Lisbon	40	32	32	29	37
60	Burleigh Street	31	23	23	31	50
61	Appleton Avenue	32	33	32	35	42
62	Capitol Drive	35	36	33	35	33
63	Silver Spring - PT. Washington	38	29	25	31	30
67	N. 76th - S. 84th	60	34	32	30	41
76	N. 60th - S. 70th	40	50	27	33	31
80	6th Street	30	30	29	28	28
Group Average		37	32	29	32	40
Non-Minority						
GRE	Oakland-Howell MetroEXpress	27	25	25	24	34
GOL	Wisconsin	29	26	22	23	32
15	Holton - Kinnickinnic	40	37	36	43	39
28	108th Street		63	53	51	
51	Oklahoma Avenue	49	44	42	59	49
52	Clement - 15th Avenue	42	41	42	58	82
53	Lincoln Avenue	36	39	40	38	37
55	Layton Avenue	55	39	36	50	59
56	Greenfield Avenue	38	32	33	45	40
64	S. 60th Street		55	55		
276	Brown Deer Shuttle	30	30	30	30	
Group Average		40	40	33	43	47

Data is for Fall of 2015 service from 2015 HASTUS Multiple Vehicle Schedule

2015 MCTS System On-Time Performance Averaged by Day and Time

Fixed Route
On-Time
Performance Jan
85.3%

Feb
83.8%

Mar
86.5%

Apr
86.0%

May
84.3%

Jun
82.7%

Jul
82.6%

Aug
82.1%

Sep
81.9%

Oct
83.6%

Nov
85.3%

Dec
85.3%

2015 Title VI Route Evaluation Weekday Bus Hours and PBH

A-72

<u>Rt</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>	<u>Passengers per bus hour</u>
Minority				
RED	Capitol Drive MetroExpress	Regular	118	47
BLU	Fond du Lac - National MetroExpress	Regular	157	45
PUR	27th Street	Regular	115	40
12	Teutonia - Hampton	Regular	195	37
14	Forest Home/Humboldt	Regular	159	36
19	M.L.K - S. 13th/S. 20th	Regular	210	39
21	North Avenue	Regular	129	40
22	Center Street	Regular	74	43
23	Fond du Lac-National	Regular	166	37
27	27th Street	Regular	132	35
30	Sherman - Wisconsin	Regular	156	55
30X	Sherman - Wisconsin	Regular	106	57
31	State - Highland	Regular	90	24
33	Vliet Street	Regular	39	21
35	35th Street	Regular	100	50
63	Silver Spring-Pt. Washington	Regular	70	45
54	Mitchell - Burnham	Regular	73	33
57	Walnut - Lisbon	Regular	72	28
60	Burleigh Street	Regular	99	43
61	Appleton Ave	Regular	72	9
62	Capitol Drive	Regular	67	49
67	N. 76th - S. 84th	Regular	131	37
76	N. 60th - S. 70th	Regular	174	32
80	6th Street	Regular	211	31
Group Average:			121	38
Non-Minority				
GRN	Oakland-Howell MetroExpress	Regular	208	36
GOL	Wisconsin	Regular	182	30
15	Holton - Kinnickinnic	Regular	158	31
28	108th Street	Regular	52	20
51	Oklahoma Avenue	Regular	74	37
52	Clement-15th Ave.	Regular	33	13
53	Lincoln Avenue	Regular	66	33
55	Layton Avenue	Regular	50	27
56	Greenfield Avenue	Regular	69	33
64	S. 60th Street	Regular	29	17
276	Brown Deer Shuttle	Regular	17	6
Group Average:			85	26

Data is for Fall of 2015 service from 2015 MCTS Quarterly Route Evaluation Summary

2015 Title VI Route Evaluation Average Hours of the Day Served

A-73

<u>Rt</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>
Minority			
RED	Capitol Drive MetroEXpress	Regular	21.0
BLU	Fond du Lac - National MetroEXpress	Regular	23.0
PUR	27th Street	Regular	19.5
12	Teutonia - Hampton	Regular	20.5
14	Forest Home/Humboldt	Regular	21.5
19	M.L.K - S. 13th/S. 20th	Regular	22.0
21	North Avenue	Regular	22.0
22	Center Street	Regular	21.0
23	Fond du Lac-National	Regular	23.0
27	27th Street	Regular	22.0
30	Sherman - Wisconsin	Regular	22.0
30X	Sherman - Wisconsin	Regular	16.0
31	State - Highland	Regular	20.0
33	Vliet Street	Regular	20.0
35	35th Street	Regular	22.0
63	Silver Spring-Pt. Washington	Regular	21.0
54	Mitchell - Burnham	Regular	22.0
57	Walnut - Lisbon	Regular	21.0
60	Burleigh Street	Regular	21.0
61	Appleton Ave	Regular	20.0
62	Capitol Drive	Regular	20.0
67	N. 76th - S. 84th	Regular	21.0
76	N. 60th - S. 70th	Regular	22.0
80	6th Street	Regular	22.0
Group Average:			21

Non-Minority			
GRN	Oakland-Howell MetroEXpress	Regular	23.0
GOL	Wisconsin	Regular	22.5
15	Holton - Kinnickinnic	Regular	23.0
28	108th Street	Regular	18.0
51	Oklahoma Avenue	Regular	21.0
52	Clement-15th Ave.	Regular	20.0
53	Lincoln Avenue	Regular	21.0
55	Layton Avenue	Regular	18.0
56	Greenfield Avenue	Regular	22.0
64	S. 60th Street	Regular	14.0
276	Brown Deer Shuttle	Regular	17.0
Group Average:			20

Data is for Fall of 2015 service from 2015 MCTS Quarterly Route Evaluation Summary

BUS COUNT EFFECTIVE AS OF 10/20/2016

	2000 New Flyer	2001 New Flyer	2002 New Flyer	2003 New Flyer	2004 New Flyer	2005 New Flyer	2006 New Flyer	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer	2014 New Flyer	2015 New Flyer	2016 New Flyer
Fond du Lac Garage				4701, 4702 4706-4707 4710 4713			5000-5007	5100-5123		5300-5354		5500-5534		5700-5717
146	0	0	0	6	0	0	8	24	0	55	0	35	0	18
Fiebrantz MCTS Buses				4703	4800-4824				5200-5234		5430-5454		5618-5627	
95	0	0	0	1	24	0	0	0	35		25	0	10	0
Kinnickinnic Garage	4305		4616 4636, 4638	4700, 4704, 4708, 4709 4711 4717- 4720 4728-4737 4740-4750	4825-4829	4900-4914		5124-5189			5400--5429		5600-5617	
169	2	0	3	30	5	15	0	66	0		30	0	18	0
Active Buses 410	2	0	3	37	29	15	8	90	35	55	55	35	28	18
MCTS Buses 410														

<u>Active Vehicles</u>	<u>Count</u>	<u>Length/Seats</u>
2000 New Flyers	4300	2 40' / 39
4600-2002 New Flyers	4600-4638	3 40' / 39
4700-4750 2003 New Flyers	4700-4750	37 40' / 39
4800-4829 2004 New Flyers	4800-4829	29 40' / 39
4900-4914 2005 New Flyers	4900-4914	15 40' / 39
5000-5007 2006 New Flyers	5000-5008	8 40' / 39
5100-5169 2010 New Flyers	5100-5189	90 40' / 39
5200-5234 2011 New Flyers	5200-5234	35 40' / 39
5300-5354 2012 New Flyers	5300-5354	55 40' / 39
5400-5454 2013 New Flyers	5400-5454	55 40' / 39
5500-5534 2014 New Flyers	5500-5534	35 40' / 39
5600-5627 2015 New Flyers	5600-5627	28 40' / 35
5700-5729 2016 New Flyers	5700-5729	18 40' / 36
Total Active Buses:	410	

<u>(Inactive)</u>
29
Out of Service Buses:
29

Active MCTS 40' Buses: 410
Total Active Buses: 410
 Out of Service Buses: 29
 Contingency Fleet: 0
Grand Total: 439

Averg. Fleet Age As of **2016**

Average Age: 5.72

Buses in Contingency Fleet (Not in Count)

Bus Number Date Added orage Location

**Milwaukee County Transit System
Interoffice Memorandum**

DATE: March 31, 2017

TO: File

FROM: Mitch Harris

SUBJECT: 2016 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

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 2016 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 – 2016 Max Loads and headway). 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 – 2016 Max Loads and headway).

On Time Performance - All operators are required to meet an on-time performance standard of being between one minute early and three 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 2016 shows that averaged 84.8% over the year (see table – 2016 MCTS System On-Time Performance).

Distribution of Transit Amenities – The supply and demand for transit service is measured according to the number of passenger per bus hour (PBH) on a route. The application of this measure to the system produces an

equitable distribution of bus hours (see table – 2016 Weekday Bus Hours and PBH). While the passengers per bus hour is higher on route 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 2016, 58% 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 routes 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 passes at several grocery stores, gas stations, and banks/credit unions.

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 (2016 – Average Hours of the Day Served on Weekdays). No corridors identified as service minority areas receives less than a 19-hour span of service on Weekdays.

Service Policies

Vehicle Assignment – MCTS’s fleet is fairly standardized with regard to amenities. All 40-foot vehicles are standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning (see table - Bus Distribution and Count). All vehicles are available for use on any route, and are assigned in no particular order.

Transit Security – The Director of Safety, Security and Risk Management coordinates all security and emergency related functions for MCTS and ensures its compliance with all local, state and federal security guidelines. She meets 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 1,360 hours of weekly service. Transit Security officers are available to respond to transit incidents 24/7/365. With direction from the Director of Safety, Security and Risk Management, 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 Director of Safety, Security and Risk Management meets 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 has installed 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 records 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 is able to request video from these cameras at any time.

The Director of Safety, Security and Risk Management trains all new operators in safe passenger interaction techniques and conflict communication skills. Through a 2015 Transit Security Grant, all MCTS employees are being trained on suspicious activity recognition and reporting as well as emergency response to an active shooter. MCTS also participates in the FTA Transit Watch Program and looks to secure funding for future promotion of suspicious activity reporting. This program is aimed to raise passenger and employee awareness of suspicious persons, activity and potential threats to our transportation infrastructure. Campaign videos and print material were funded through a Transit Security grant and are available on the website.

2016 Title VI Route Evaluation
Weekday Average Maximum Load Factors
For Regular Routes During AM and PM Peak Periods

<u>Route</u>	<u>Name</u>	AM Load	PM Load
Minority			
RED	Capitol Drive	42	34
BLU	Fond du Lac - National	44	31
PUR	27th Street	28	28
12	Teutonia-Hampton	27	31
14	Forest Home	36	41
19	ML King - S. 13th/S. 20th	43	28
21	North Avenue	23	30
22	Center Street	21	23
23	Fond du Lac- National	30	32
27	27th Street	35	30
30	Sherman - Wisconsin	34	39
30X	Sherman - Wisconsin	51	38
31	State - Highland	16	21
33	Vliet Street	12	10
35	35th Street	26	29
54	Mitchell - Burnham	17	17
57	Walnut - Lisbon	31	28
60	Burleigh Street	37	25
61	Appleton Avenue	10	13
62	Capitol Drive	32	28
63	Silver Spring - Port Washington	30	29
67	N. 76th - S. 84th	38	37
76	N. 60th - S. 70th	31	30
80	6th Street	30	32
Group Average		30.17	28.50
Non-Minority			
GRE	Oakland-Howell	38	45
GOL	Wisconsin	34	36
15	Holton - Kinnickinnic	26	34
28	108th Street	13	14
51	Oklahoma Avenue	24	24
52	Clement - 15th Avenue	23	25
53	Lincoln Avenue	25	22
55	Layton Avenue	22	19
56	Greenfield Avenue	17	28
64	S. 60th Street	16	10
276	Brown Deer Shuttle	2	3
Group Average		23.80	25.70

Data is for Fall of 2016 service from 2016 HASTUS Multiple Vehicle Schedule

Maximum loads are based on the average of the maximum number of people aboard each trip from 6a-9a or 3p-6p in the peak direction from APC route trip list report data for Fall of 2016. 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).

2016 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>
Minority						
RED	Capitol Drive	16	16	14	26	28
BLU	Fond du Lac - National	21	24	24	26	43
PUR	27th Street	22	28	28	39	38
12	Teutonia-Hampton	12	11	12	20	22
14	Forest Home	18	21	20	33	27
19	ML King - S. 13th/S. 20th	14	16	15	18	24
21	North Avenue	17	17	14	17	25
22	Center Street	16	18	16	22	29
23	Fond du Lac- National	22	27	26	23	41
27	27th Street	21	23	20	39	41
30	Sherman - Wisconsin	21	21	18	27	30
30X	Sherman - Wisconsin	21	19	22	31	N/A
31	State - Highland	20	22	20	19	27
33	Vliet Street	35	36	36	31	32
35	35th Street	18	21	17	25	27
54	Mitchell - Burnham	31	29	31	32	31
57	Walnut - Lisbon	26	26	27	31	35
60	Burleigh Street	22	25	20	28	30
61	Appleton Avenue	27	27	28	34	34
62	Capitol Drive	18	17	18	23	28
63	Silver Spring - Port Washington	26	25	26	24	40
67	N. 76th - S. 84th	16	19	20	32	30
76	N. 60th - S. 70th	19	20	21	31	32
80	6th Street	15	17	15	22	35
Group Average		21	22	21	27	32
Non-Minority						
GRE	Oakland-Howell	15	16	14	18	24
GOL	Wisconsin	16	16	13	24	28
15	Holton - Kinnickinnic	22	23	23	24	29
28	108th Street	28	38	35	51	54
51	Oklahoma Avenue	29	25	25	28	26
52	Clement - 15th Avenue	41	43	45	63	84
53	Lincoln Avenue	21	37	22	25	31
55	Layton Avenue	36	38	39	36	45
56	Greenfield Avenue	26	27	28	28	43
64	S. 60th Street	41	40	40	38	40
276	Brown Deer Shuttle	30	30	30	30	N/A
Group Average		28	30	29	34	40

Data is for Fall of 2016 service from 2016 HASTUS Multiple Vehicle Schedule

2016 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>
Minority						
RED	Capitol Drive	32	28	27	31	40
BLU	Fond du Lac - National	40	34	31	38	46
PUR	27th Street	29	25	29	28	70
12	Teutonia-Hampton	26	19	19	21	32
14	Forest Home	31	26	25	33	37
19	ML King - S. 13th/S. 20th	21	21	22	25	27
21	North Avenue	22	20	19	20	30
22	Center Street	25	24	23	22	26
23	Fond du Lac- National	36	34	33	41	50
27	27th Street	26	25	25	31	50
30	Sherman - Wisconsin	26	25	27	28	22
30X	Sherman - Wisconsin	26	25	27	28	N/A
31	State - Highland	38	24	22	32	43
33	Vliet Street	23	25	25	24	24
35	35th Street	29	24	20	23	29
54	Mitchell - Burnham	43	31	47	44	44
57	Walnut - Lisbon	49	36	33	35	47
60	Burleigh Street	36	23	23	22	35
61	Appleton Avenue	34	29	26	31	33
62	Capitol Drive	30	26	28	34	33
63	Silver Spring - Port Washington	36	28	26	23	30
67	N. 76th - S. 84th	61	36	34	35	40
76	N. 60th - S. 70th	27	22	20	28	30
80	6th Street	29	28	29	28	45
Group Average		32	27	27	29	38
Non-Minority						
GRE	Oakland-Howell	31	21	19	20	29
GOL	Wisconsin	23	21	18	20	26
15	Holton - Kinnickinnic	34	35	30	33	36
28	108th Street	53	54	54	52	52
51	Oklahoma Avenue	29	30	31	30	28
52	Clement - 15th Avenue	41	42	44	54	79
53	Lincoln Avenue	38	41	42	39	37
55	Layton Avenue	49	36	36	34	42
56	Greenfield Avenue	41	34	32	36	43
64	S. 60th Street	56	56	56	56	N/A
276	Brown Deer Shuttle	30	30	30	30	N/A
Group Average		40	37	32	37	41

Data is for Fall of 2016 service from 2016 HASTUS Multiple Vehicle Schedule

2016 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>
Minority						
RED	Capitol Drive	33	26	26	29	46
BLU	Fond du Lac - National	49	46	43	39	63
PUR	27th Street	49	29	31	44	53
12	Teutonia-Hampton	26	20	19	23	31
14	Forest Home	30	29	28	31	29
19	ML King - S. 13th/S. 20th	27	24	23	24	34
21	North Avenue	34	22	20	24	32
22	Center Street	29	23	22	22	28
23	Fond du Lac- National	48	43	42	39	59
27	27th Street	42	29	31	42	53
30	Sherman - Wisconsin	25	25	26	25	27
30X	Sherman - Wisconsin	N/A	27	27	26	N/A
31	State - Highland	33	23	21	27	39
33	Vliet Street	23	24	25	23	23
35	35th Street	29	22	19	24	28
54	Mitchell - Burnham	40	45	45	42	42
57	Walnut - Lisbon	41	36	33	31	37
60	Burleigh Street	27	22	22	27	41
61	Appleton Avenue	34	35	35	34	46
62	Capitol Drive	35	36	33	35	33
63	Silver Spring - Port Washington	36	28	25	32	31
67	N. 76th - S. 84th	54	32	32	33	40
76	N. 60th - S. 70th	30	27	28	33	31
80	6th Street	32	30	29	28	28
Group Average		35	29	29	31	38
Non-Minority						
GRE	Oakland-Howell	29	26	25	25	32
GOL	Wisconsin	29	26	22	22	32
15	Holton - Kinnickinnic	40	37	36	43	39
28	108th Street	N/A	63	53	51	N/A
51	Oklahoma Avenue	29	29	31	30	32
52	Clement - 15th Avenue	42	41	42	58	82
53	Lincoln Avenue	36	39	40	38	37
55	Layton Avenue	55	39	36	50	59
56	Greenfield Avenue	41	33	32	41	41
64	S. 60th Street	N/A	55	55	N/A	N/A
276	Brown Deer Shuttle	30	30	30	30	N/A
Group Average		38	39	33	40	44

Data is for Fall of 2016 service from 2016 HASTUS Multiple Vehicle Schedule

2016 MCTS System On-Time Performance Averaged by Day and Time

<u>Fixed Route</u> On-Time Performance	<u>Jan</u> 86.4%
	<u>Feb</u> 86.8%
	<u>Mar</u> 87.1%
	<u>Apr</u> 86.2%
	<u>May</u> 85.2%
	<u>Jun</u> 84.2%
	<u>Jul</u> 82.6%
	<u>Aug</u> 83.1%
	<u>Sep</u> 82.1%
	<u>Oct</u> 84.6%
	<u>Nov</u> 85.6%
	<u>Dec</u> 84.1%

2016 Title VI Route Evaluation Weekday Bus Hours and PBH

<u>Route</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>	<u>PBH</u>	
Minority					
RED	Capitol Drive	Regular	119	46	
BLU	Fond du Lac - National	Regular	155	41	
PUR	27th Street	Regular	115	44	
12	Teutonia - Hampton	Regular	182	34	
14	Forest Home/Humboldt	Regular	159	32	
19	M.L.K - S. 13th/S. 20th	Regular	209	31	
21	North Avenue	Regular	129	32	
22	Center Street	Regular	74	39	
23	Fond du Lac-National	Regular	164	33	
27	27th Street	Regular	114	42	
30	Sherman - Wisconsin	Regular	155	41	
30X	Sherman - Wisconsin	Regular	106	50	
31	State - Highland	Regular	78	17	
33	Vliet Street	Regular	39	22	
35	35th Street	Regular	100	38	
63	Silver Spring-Port Washington	Regular	70	40	
54	Mitchell - Burnham	Regular	72	31	
57	Walnut - Lisbon	Regular	71	28	
60	Burleigh Street	Regular	101	35	
61	Appleton Ave	Regular	71	10	
62	Capitol Drive	Regular	68	40	
67	N. 76th - S. 84th	Regular	129	31	
76	N. 60th - S. 70th	Regular	166	30	
80	6th Street	Regular	210	30	
			Group	119	34
			Average:		
Non-Minority					
GRE	Oakland-Howell	Regular	206	30	
GOL	Wisconsin	Regular	182	33	
15	Holton - Kinnickinnic	Regular	158	35	
28	108th Street	Regular	52	16	
51	Oklahoma Avenue	Regular	89	33	
52	Clement-15th Ave.	Regular	33	14	
53	Lincoln Avenue	Regular	66	29	
55	Layton Avenue	Regular	51	23	
56	Greenfield Avenue	Regular	70	40	
64	S. 60th Street	Regular	29	19	
276	Brown Deer Shuttle	Regular	17	7	
			Group	87	25
			Average:		

Data is for Fall of 2016 service from 2016 MCTS Quarterly Route Evaluation Summary

2016 Title VI Route Evaluation
Average Hours of the Day Served on Weekdays

<u>Route</u>	<u>Name</u>	<u>Type of Route</u>	<u>Bus Hours</u>
Minority			
RED	Capitol Drive	Regular	21.0
BLU	Fond du Lac - National	Regular	23.0
PUR	27th Street	Regular	19.5
12	Teutonia - Hampton	Regular	20.5
14	Forest Home/Humboldt	Regular	21.5
19	M.L.K - S. 13th/S. 20th	Regular	22.0
21	North Avenue	Regular	22.0
22	Center Street	Regular	21.0
23	Fond du Lac-National	Regular	23.0
27	27th Street	Regular	22.0
30	Sherman - Wisconsin	Regular	22.0
30X	Sherman - Wisconsin	Regular	16.0
31	State - Highland	Regular	20.0
33	Vliet Street	Regular	20.0
35	35th Street	Regular	22.0
63	Silver Spring-Port Washington	Regular	21.0
54	Mitchell - Burnham	Regular	22.0
57	Walnut - Lisbon	Regular	21.0
60	Burleigh Street	Regular	21.0
61	Appleton Ave	Regular	20.0
62	Capitol Drive	Regular	20.0
67	N. 76th - S. 84th	Regular	21.0
76	N. 60th - S. 70th	Regular	22.0
80	6th Street	Regular	22.0
Group Average:			21.1
Non-Minority			
GRE	Oakland-Howell	Regular	23.0
GOL	Wisconsin	Regular	22.5
15	Holton - Kinnickinnic	Regular	23.0
28	108th Street	Regular	18.0
51	Oklahoma Avenue	Regular	21.0
52	Clement-15th Ave.	Regular	20.0
53	Lincoln Avenue	Regular	21.0
55	Layton Avenue	Regular	18.0
56	Greenfield Avenue	Regular	22.0
64	S. 60th Street	Regular	14.0
276	Brown Deer Shuttle	Regular	13.0
Group Average:			20.0

Data is for Fall of 2016 service from 2016 MCTS Quarterly Route Evaluation Summary

BUS COUNT EFFECTIVE AS OF 10/20/2016

	2000 New Flyer	2001 New Flyer	2002 New Flyer	2003 New Flyer	2004 New Flyer	2005 New Flyer	2006 New Flyer	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer	2014 New Flyer	2015 New Flyer	2016 New Flyer
Fond du Lac Garage				4701, 4702 4706-4707 4710 4713			5000-5007	5100-5123		5300-5354		5500-5534		5700-5717
146	0	0	0	6	0	0	8	24	0	55	0	35	0	18
Fiebrantz MCTS Buses				4703	4800-4824				5200-5234		5430-5454		5618-5627	
95	0	0	0	1	24	0	0	0	35		25	0	10	0
Kinnickinnic Garage	4305		4616 4636, 4638	4700, 4704, 4708, 4709 4711 4717- 4720 4728-4737 4740-4750	4825-4829	4900-4914		5124-5189			5400--5429		5600-5617	
169	2	0	3	30	5	15	0	66	0		30	0	18	0
Active Buses 410	2	0	3	37	29	15	8	90	35	55	55	35	28	18
MCTS Buses 410														

<u>Active Vehicles</u>	<u>Count</u>	<u>Length/Seats</u>
2000 New Flyers	4300	2 40' / 39
4600-2002 New Flyers	4600-4638	3 40' / 39
4700-4750 2003 New Flyers	4700-4750	37 40' / 39
4800-4829 2004 New Flyers	4800-4829	29 40' / 39
4900-4914 2005 New Flyers	4900-4914	15 40' / 39
5000-5007 2006 New Flyers	5000-5008	8 40' / 39
5100-5169 2010 New Flyers	5100-5189	90 40' / 39
5200-5234 2011 New Flyers	5200-5234	35 40' / 39
5300-5354 2012 New Flyers	5300-5354	55 40' / 39
5400-5454 2013 New Flyers	5400-5454	55 40' / 39
5500-5534 2014 New Flyers	5500-5534	35 40' / 39
5600-5627 2015 New Flyers	5600-5627	28 40' / 35
5700-5729 2016 New Flyers	5700-5729	18 40' / 36
Total Active Buses:	410	

<u>(Inactive)</u>
29
Out of Service Buses: 29

Active MCTS 40' Buses: 410
Total Active Buses: 410
 Out of Service Buses: 29
 Contingency Fleet: 0
Grand Total: 439

Aver. Fleet Age As of **2016**

Average Age: 5.72

Buses in Contingency Fleet (Not in Count)

Bus Number Date Added Storage Location

**Milwaukee County Transit System
Interoffice Memorandum**

TO: File

FROM: Tom Winter, Director of Schedule & Planning

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

DATE: May 16, 2017

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.

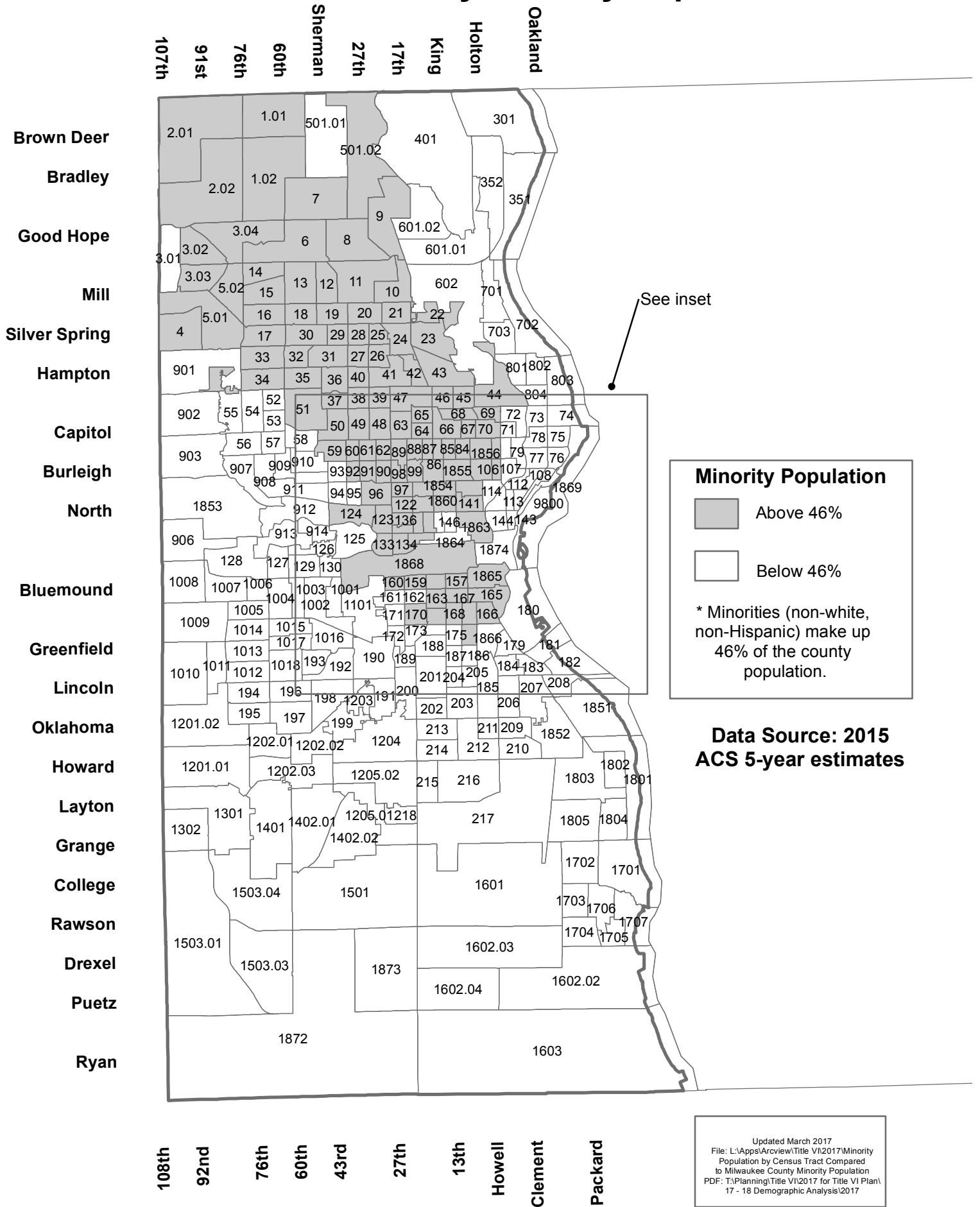
According to 2015 data from the American Community Survey, the minority population represents 46% of the total population in the MCTS service area (see map A-xx). The majority of minority residents live in the north central and north west side of Milwaukee County. As shown on page A-xx, this area is served by several cross town routes. In fact, a significant proportion of all transit service is operated in these areas.

The low income population represents 21% of the County's total population (see maps A-xx and A--xx). 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 rider's opinions. The key findings were as follows:

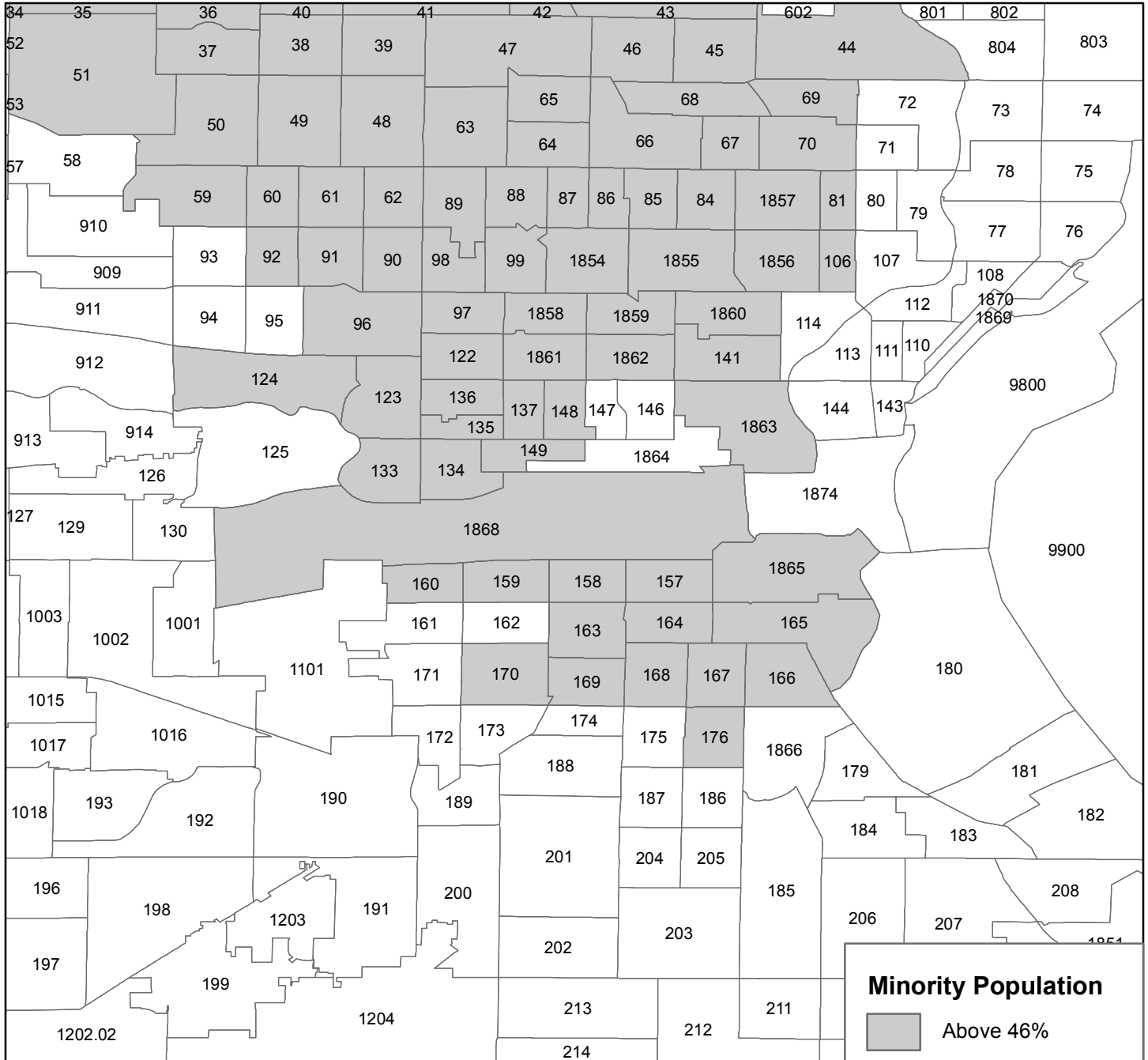
- The largest proportion (50%) of riders indicate they are African American, followed by riders who identify themselves as White (36%). 6% of riders identify themselves as Hispanic.
- The M-Card, at 38%, is the most common form of fare payment. The Go Pass was noted as the fare form for 23% of riders. 23% of user pay with cash.
- The highest reported reason for riding the bus (41%) was to get to work. 18% reported they used the bus to get to medical appointments and 17% for social / recreational purposes. 10% said they rode for shopping trips or to go to school.
- 60% of riders reported they earned less than \$28,000 in total household income. 23% reported their income was \$36,000 or more.
- Approximately half of trips are made by riders that are transit dependent as indicated by 50 percent of riders saying they do not have a driver's license.
- 30% of riders reported riding the bus more than 5 times per week. 24% said they use transit 3 to 5 times per week.
- Nearly half of riders reported they have been using MCTS for 15 years or more. 7% have started riding within the past year.
- Overall, 84% of riders reported having their overall bus service needs either met or exceeded by MCTS.

Minority Population by Census Tract Compared to Milwaukee County Minority Population ¹⁸⁷



Map Inset

Minority Population by Census Tract Compared to Milwaukee County Minority Population



Minority Population

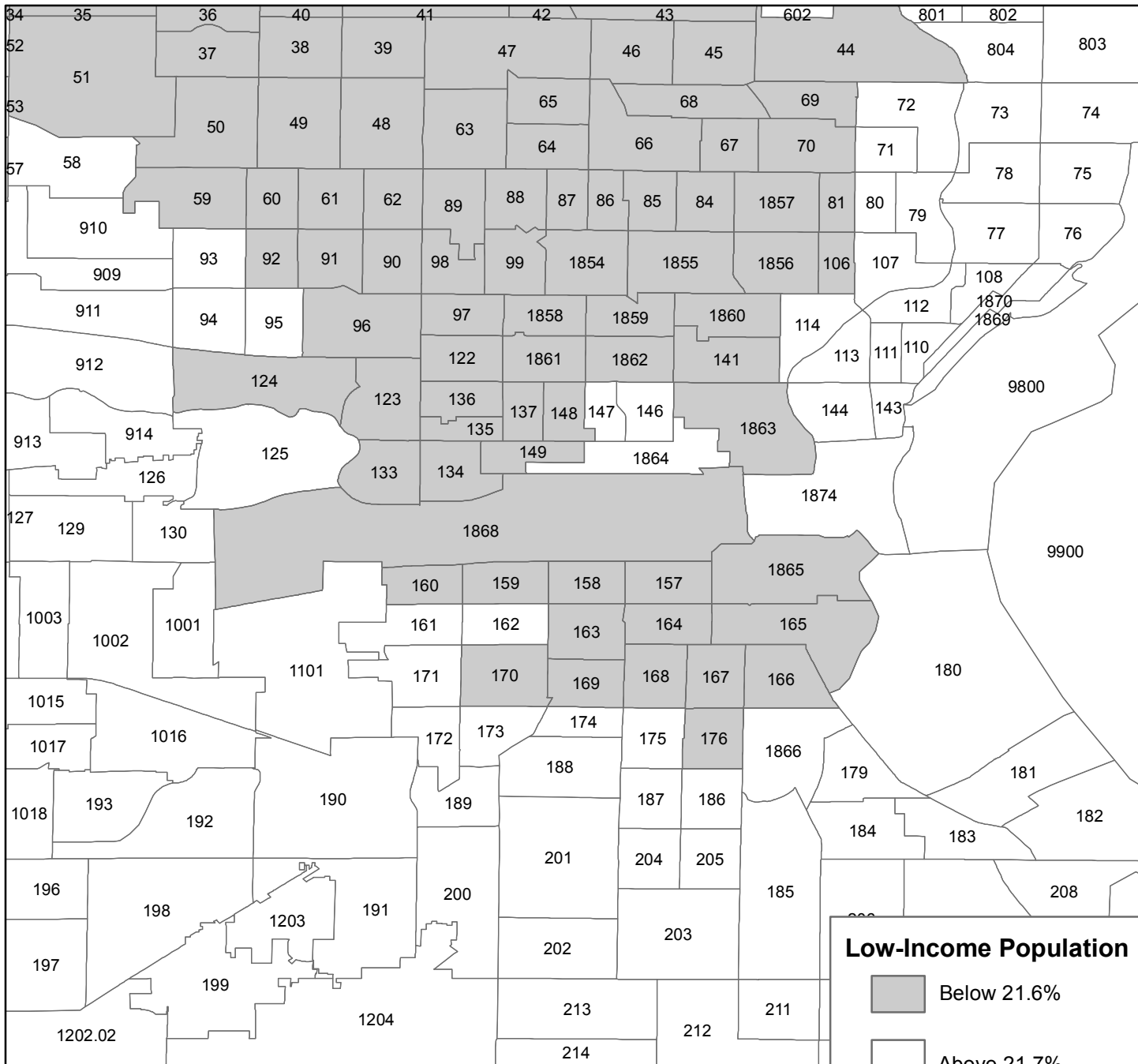
- Above 46%
- Below 46%

* Minorities (non-white, non-Hispanic) make up 46% of the county population.
Data Source: 2015 ACS 5-year estimates

Updated March 2017
File: L:\Apps\Arcview\Title VI\2017\Minority Population by Census Tract Compared Inset to Milwaukee County Minority Population
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Map Inset

Low-Income Population by Census Tract Compared to Milwaukee County Low-Income Population



Low-Income Population

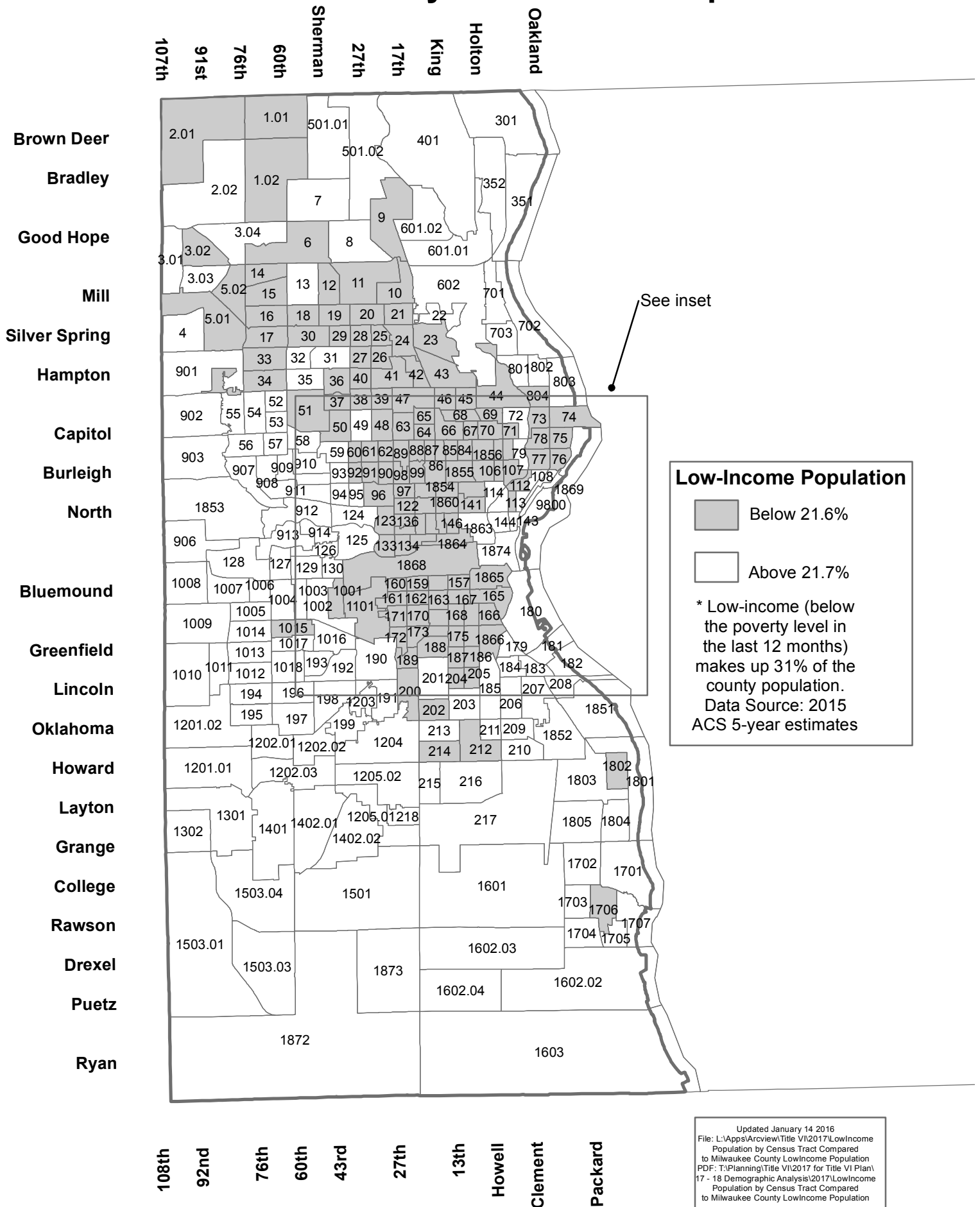
- Below 21.6%
- Above 21.7%

Low-income (below the poverty level in the last 12 months) makes up 31% of the county population.

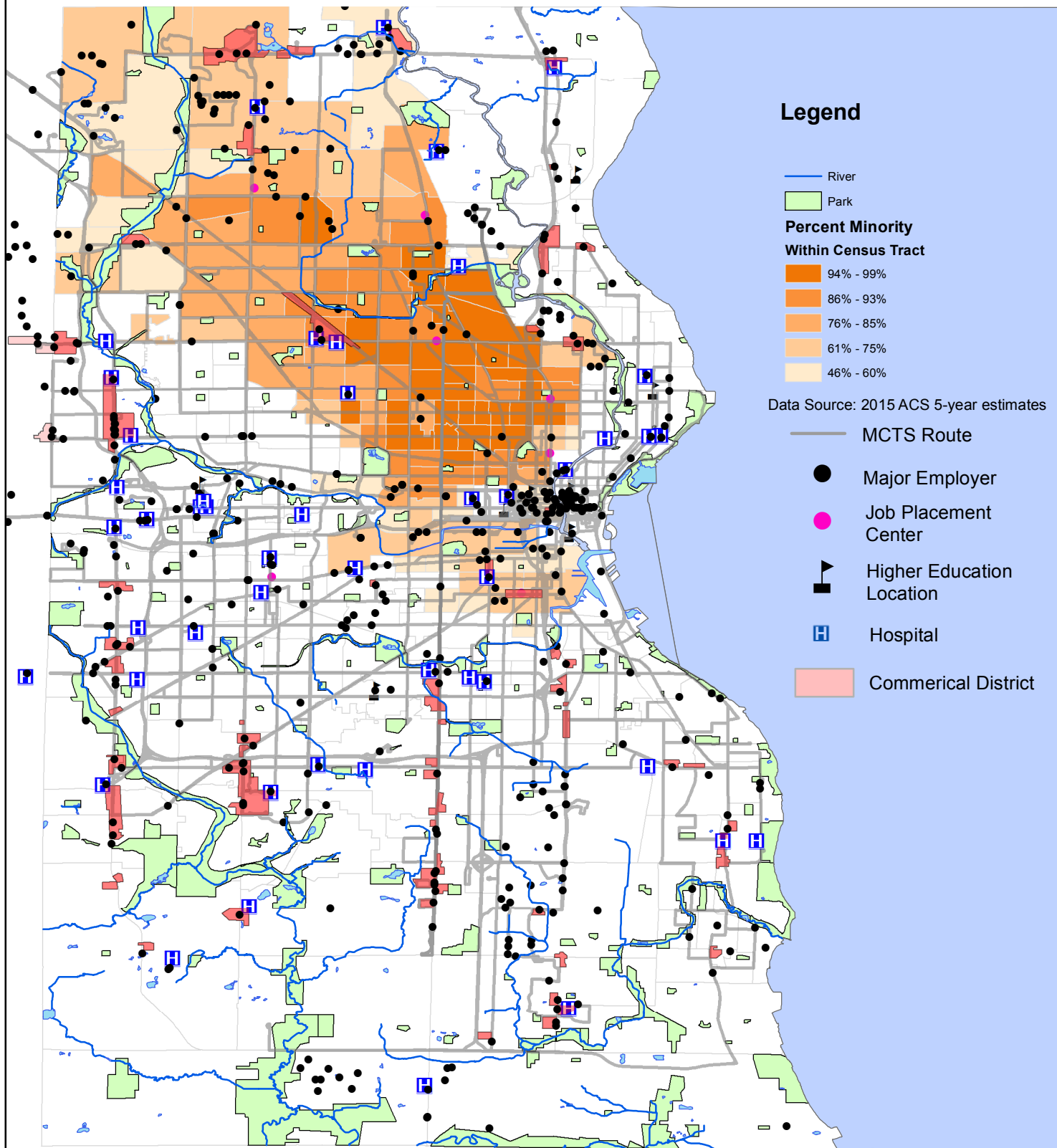
Source data: 2015 ACS 5-year estimates

Updated March 2017
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Low-Income Population by Census Tract Compared to Milwaukee County Low-Income Population



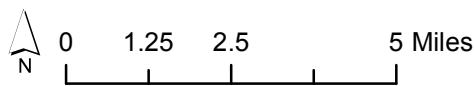
Milwaukee County Transit System Percent of Minority Population within Census Tract



Legend

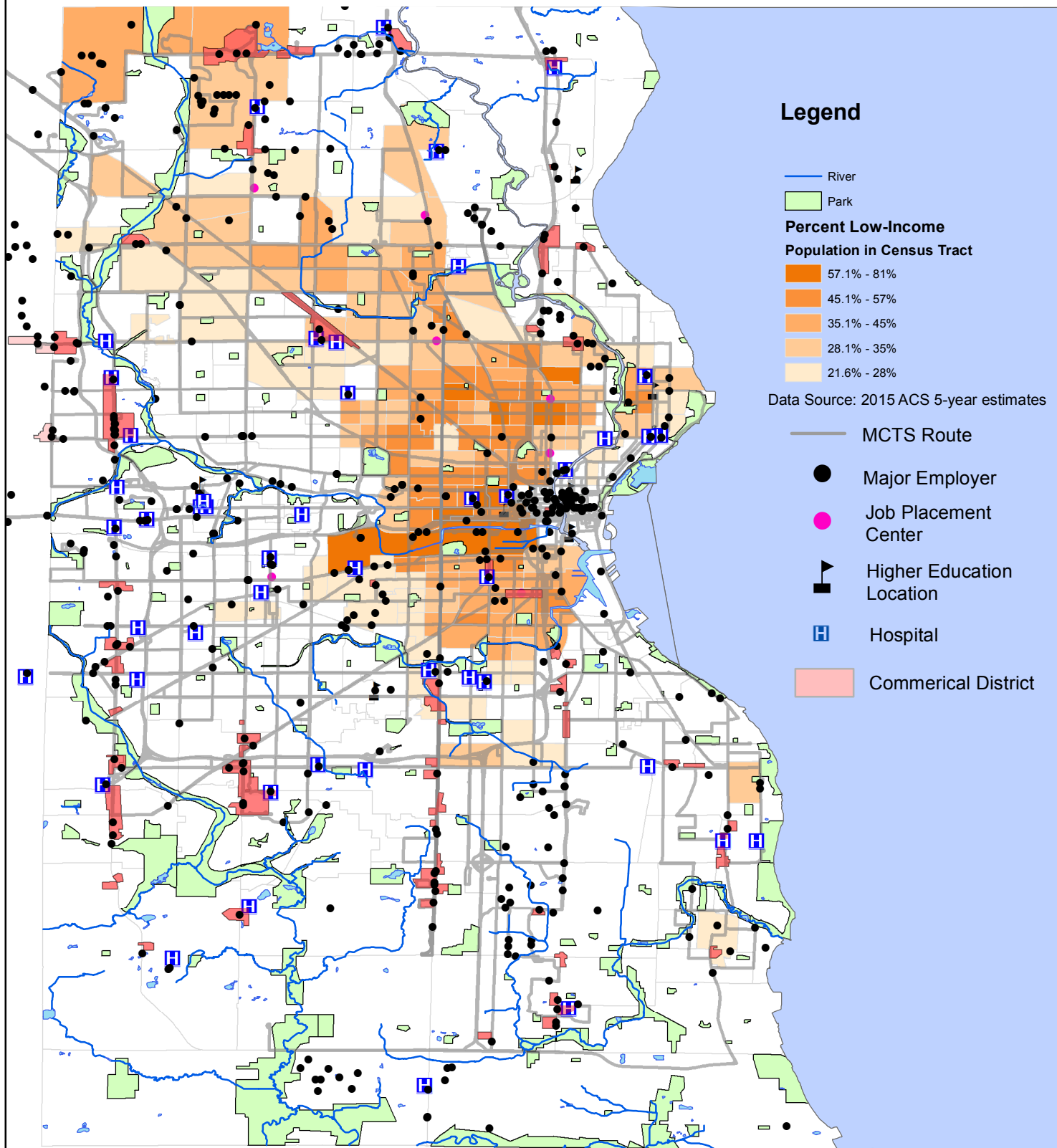
- River
- Park
- Percent Minority Within Census Tract**
 - 94% - 99%
 - 86% - 93%
 - 76% - 85%
 - 61% - 75%
 - 46% - 60%
- MCTS Route
- Major Employer
- Job Placement Center
- ▲ Higher Education Location
- Hospital
- Commerical District

Data Source: 2015 ACS 5-year estimates



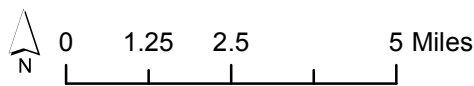
Source: Map Produced by MCTS Planning Department
Location: L:\Apps\Arcview\Title VI\2017\Milwaukee
County Transit System Percent of Minority Population
within Census Tract
PDF: T:\Planning\Title VI\2017 for Title VI Plan\
17 - 18 Demographic Analysis\2017\Milwaukee
County Transit System Percent of Minority Population
within Census Tract
Updated: March 14, 2017

Milwaukee County Transit System Percent of Low-Income Population within Census Tract



Legend

- River
- Park
- Percent Low-Income Population in Census Tract**
 - 57.1% - 81%
 - 45.1% - 57%
 - 35.1% - 45%
 - 28.1% - 35%
 - 21.6% - 28%
- Data Source: 2015 ACS 5-year estimates
- MCTS Route
- Major Employer
- Job Placement Center
- Higher Education Location
- Hospital
- Commerical District



Location: L:\Apps\Arcview\Title VI\2017\Milwaukee County Transit System Percent of LowIncome Population within Census Tract
PDF: T:\Planning\Title VI\2017 for Title VI Plan\17 - 18 Demographic Analysis\2017\Milwaukee County Transit System Percent of LowIncome Population within Census Tract
Updated: March 14, 2017

**Milwaukee County Transit System
Interoffice Memorandum**

TO: File

FROM: Tom Winter

SUBJECT: Title VI Fare Equity Analysis - Change in Access to Retail Outlets - Updated

DATE: June 16, 2015

The Federal Transit Administration (FTA) requires transit providers to 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 a smart card based fare collection system (the “M-Card”) that is designed to eventually machine-validate all fares. 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.

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.

Updated Analysis of New Fare Collection System – Change in Access to Retail Outlets

MCTS analyzed the impact of a proposal to reduce the number of retail outlets where passes are sold to see if there would be a disparate impact or disproportionate burden on minority or low income passengers. 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’ network of outlets prior to the introduction of the new fare collection system had approximately 250 locations. These sites include grocery stores, banks, pharmacies, universities, and municipal offices.

The transition to the new fare collection system has currently reduced the number of outlet locations to approximately 80. In the past, no special infrastructure was needed to approve a location as a retail outlet. Under the new system, outlets need internet data connections to allow customers to load funds onto their smart card or to purchase fares. This requires outlets have specialized computer equipment (SMARD's). Therefore, MCTS had to balance the amount of sales at an outlet versus the cost of equipping the outlet with a SMARD. Despite this reduction, MCTS made sure to maintain outlets in areas of high residential density and high bus ridership.

A GIS analysis indicated that 65% (161) of outlets prior to the new fare collection system were in minority census tracts and 35% (86) were in non-minority tracts. Under the current network, the number of outlets has decreased to 86 (33 outlets in minority census tracts and 53 outlets in non-minority census tracts). The change from 161 to 33 outlets in minority tracts represents a decrease of 79% while the change from 86 to 53 outlets in non-minority tracts represents a decrease of 38%. The impact ratio would be 0.48 (38% / 79%) and a disparate impact would exist as it is below 0.80.

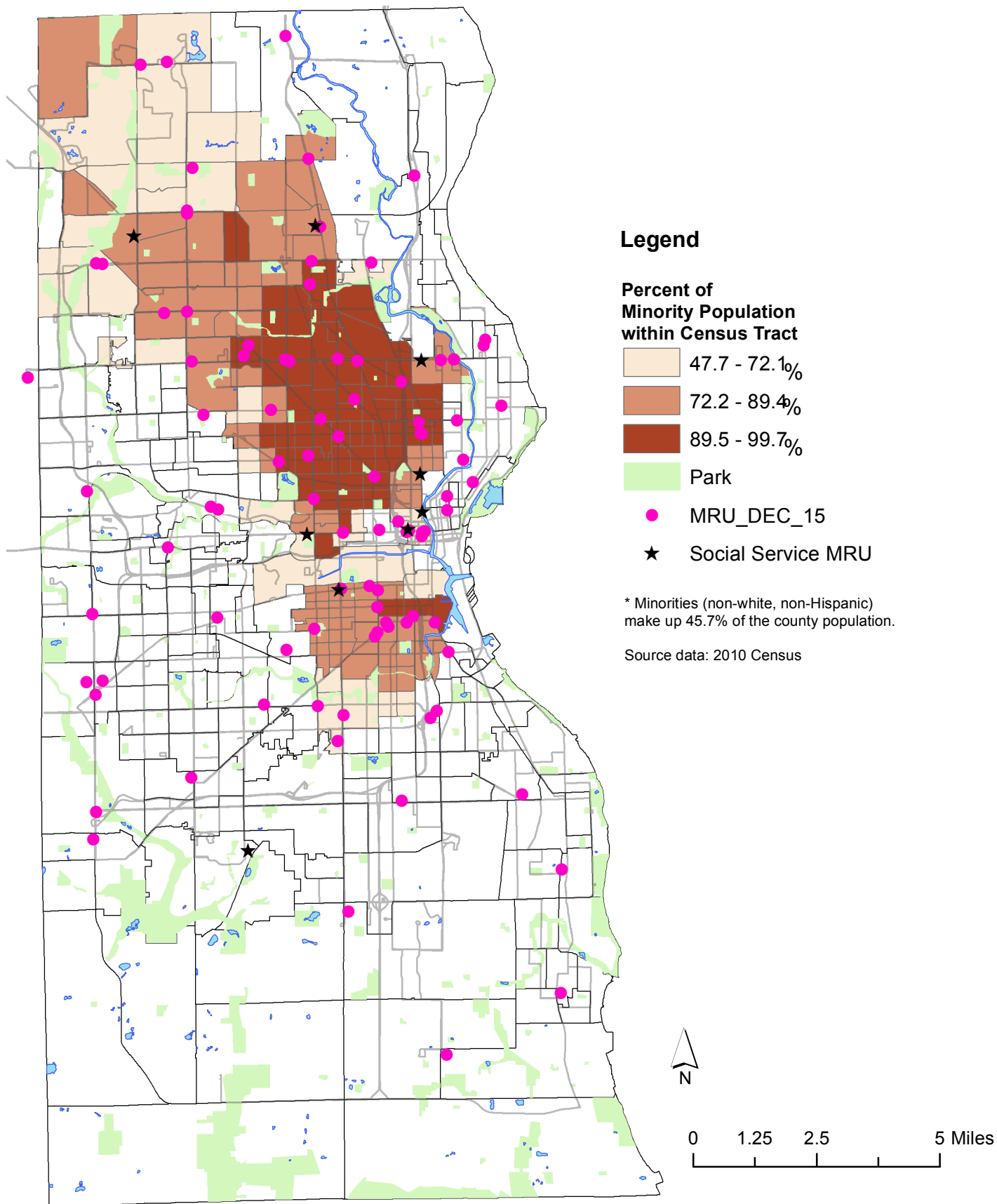
As regards income measures, 58% of outlets (143) are in low income census tracts and 42% (103) are in non-low-income tracts. Under the current network, the number of outlets in minority census tracts decreased to 36 outlets and to 50 outlets in non-minority census tracts. The change from 143 to 36 outlets in low income tracts represents a decrease of 74% while the change from 103 to 50 outlets in non-low-income tracts represents a decrease of 51%. The impact ratio would thus be 0.69 (51 / 74) and a disproportionate burden would exist.

Requirement to Mitigate Disparate Impacts / Disproportionate Burdens

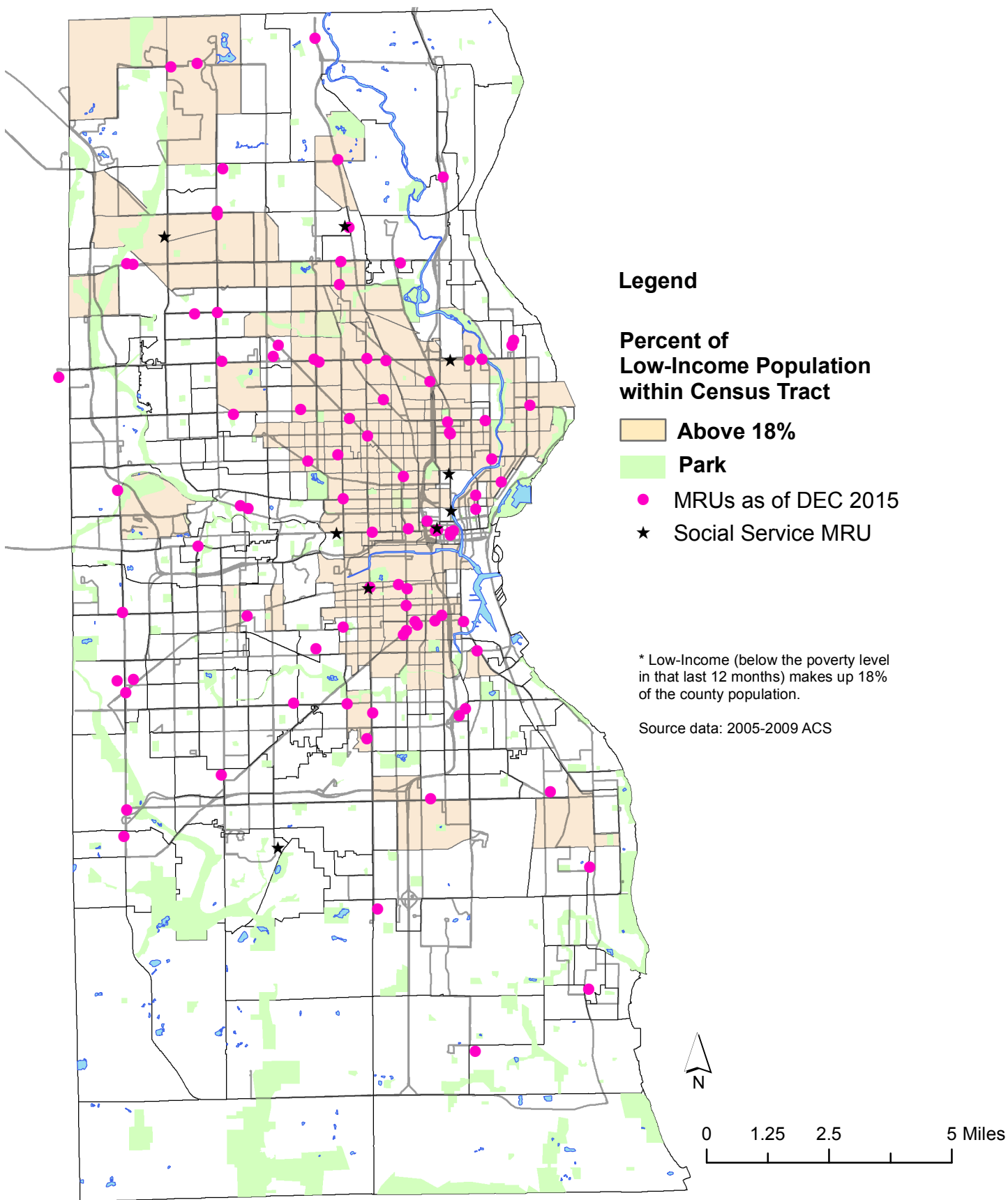
The FTA requires transit systems that determine a finding of a disparate impact or a disproportionate burden take actions to minimize or mitigate the impact. Consequently, MCTS will take the following actions to minimize or mitigate the impacts / burdens described earlier with regard to the proposed reduction on retail outlets:

- MCTS can expand the number of SMARD's in minority and low income census tracts. This will help to address the disparate impact and increase the number of retail outlets where cards can be purchased.
- Passes are currently being made more readily available to access and reload on the internet and by phone, which reduces the number of trips passengers will have to make to purchase weekly tickets.
- The M-Card is made capable of being loaded with two 7-day passes at one time, which reduces the total number of trips to retail outlets to purchase weekly passes.
- The new Go-Pass program (provides unlimited free rides for eligible seniors or persons with disabilities) will expand card availability and help to address these impacts.

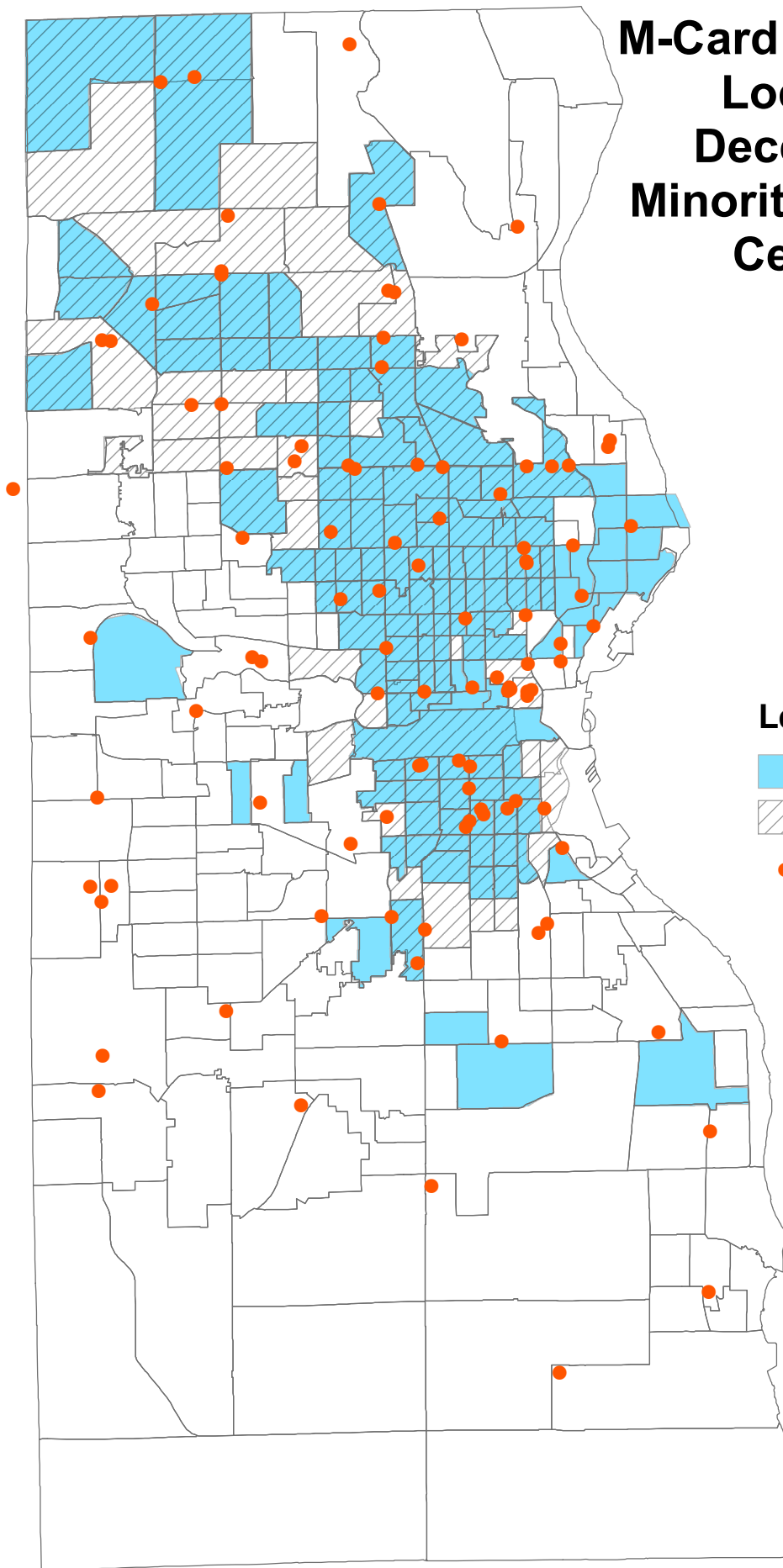
Current MCTS MRU Locations Compared to Percent of Minority Population within Census Tract






Current MCTS Sales Outlet Locations Compared to Percent of Low-Income Population within Census Tract



M-Card Recharging Unit Locations as of December 2015 in Minority & Low Income Census Tracts



Legend

-  Low Income Census Tracts
-  Minority Census Tracts
-  MRU Locations

* Minorities (non-white, non-Hispanic) make up 45.7% of the county population. Source data: 2010 Census
* Low-Income (below the poverty level in that last 12 months) makes up 18% of the county population. Source data: 2005-2009 ACS



SOUTHEASTERN WISCONSIN REGIONAL PLANNING COMMISSION

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MEMORANDUM

TITLE VI FARE EQUITY ANALYSIS – GROWING OPPORTUNITIES (GO PASS) FARE PROGRAM

The Federal Transit Administration (FTA) requires transit providers to conduct an analysis of any change in fares to determine whether these changes will have a disparate impact on minority populations or a disproportionate burden on low-income populations. Through action by the Milwaukee County Board of Supervisors, the 2015 Milwaukee County Budget includes the elimination of fares for passengers over the age of 64 or with disabilities starting April 1, 2015. At the request of the County Board, Commission staff will be completing this fare equity analysis as required by the County's Title VI plan. This analysis will need to be reviewed and affirmed by Milwaukee County, as the grantee recipient for the FTA funds utilized by the Milwaukee County Transit System (MCTS), and kept on file to provide to the FTA during the Triennial Review process.

The *Growing Opportunities Fare* or *GO Pass* program will eliminate fares for seniors aged 65 and older and people with disabilities on MCTS fixed route bus services. In order to complete a fare equity analysis, the following steps must be followed:

- Develop a disparate impact policy and disproportionate burden policy with input from the public
- Review the current and proposed change in fares
- Examine the usage of the system by minority and low-income riders who are 65 and older or have a disability compared to the remainder of riders and the County as a whole
- Assess the impacts of the proposed changes in fares
- Determine if there is a finding of a disparate impact or a 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

Developed through public input, 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-fifths 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 percent change in fares in the minority group compared to the non-minority group is below four-fifths (0.80) or 80 percent. 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.

CURRENT AND PROPOSED FARES

Under the adopted Milwaukee County 2015 Budget, fares for riders aged 65 or older, or riders with a disability, will be reduced from \$1.10 to \$0.00 for the single-ride cash fare. Riders aged 65 or older or riders with a disability will also pay nothing for daily, weekly, and monthly passes under the *GO Pass* program. See Table 1 for a comparison of current fares to proposed fares.

Table 1

CURRENT AND PROPOSED FARES FOR SENIORS AND PEOPLE WITH DISABILITIES ON MCTS FIXED-ROUTE SERVICES

Fare Type	Current Fare	Proposed Fare
Single-Ride Cash Fare	\$1.10	\$0.00
Single-Ride MCard Fare	\$1.10	\$0.00
One-Day Pass (Purchased in Advance)	\$2.00	\$0.00
One-Day Pass (Purchased on Bus)	\$3.00	\$0.00
Weekly Pass	\$11.00	\$0.00
Monthly Pass	\$32.00	\$0.00

Source: MCTS and SEWRPC.

USAGE OF THE SYSTEM BY SENIORS AND PEOPLE WITH DISABILITIES BY MINORITY AND LOW-INCOME STATUS

In November 2012, the Southeastern Wisconsin Regional Planning Commission (SEWRPC) completed an on-board survey of passengers on the MCTS fixed-route bus system, which included asking passengers for their age, race, ethnicity, and income. This information will be used to estimate the potential for disparate impact and disproportionate burden for seniors. However, this survey did not ask passengers if they had a disability, so different data will be used to estimate and discuss the race, ethnicity, and income of passengers with a disability.

Usage of the System by Seniors Compared to All Other Passengers

In order to determine if there is a disparate impact on minorities or a disproportionate burden on low-income individuals due to this fare change, the minority and low-income status of passengers 65 and older was compared to the same characteristics for passengers under 65. This comparison is shown in Table 2. Low-income status was determined using 2012 U.S. Department of Health and Human Services Poverty Guidelines, and Hispanic passengers were included as minorities.

Table 2

PROPORTIONATE SHARE OF MCTS RIDERSHIP BY AGE GROUP, MINORITY STATUS, AND INCOME STATUS FROM SEWRPC 2012 ON-BUS SURVEY

Category	Percent Under 65	Percent 65 and Older	All Passengers
All Passengers	96.9	3.1	100.0
Minority Passengers	60.8	28.1	60.2
Non-Minority Passengers	39.2	71.9	39.8
Low-Income Passengers	50.1	26.6	48.8
Non-Low-Income Passengers	49.9	73.4	51.2

Source: SEWRPC.

Table 3 contains the same information for all residents of Milwaukee County from the U.S. Census 2010-2012 American Community Survey.

Table 3

PROPORTIONATE SHARE OF MILWAUKEE COUNTY BY AGE GROUP, MINORITY STATUS, AND INCOME STATUS FROM THE 2010-2012 AMERICAN COMMUNITY SURVEY

Category	Percent Under 65	Percent 65 and Older	All Residents
All Residents	88.6	11.4	100.0
Minority Residents	47.8	20.4	44.6
Non-Minority Residents	52.2	79.6	55.4
Low-Income Residents	23.3	10.3	21.8
Non-Low-Income Residents	76.7	89.7	78.2

Source: SEWRPC and the U.S. Census Bureau

Milwaukee County Residents with Disabilities Compared to All Other Residents

Without specific information regarding passengers with disabilities, only information on the minority or low-income status of all County residents is available. The information in Table 4 is considered as part of this analysis with the understanding that it is the best proxy available for the minority and low-income status of MCTS passengers with disabilities. Low-income status was determined using 2012 U.S. Department of Health and Human Services Poverty Guidelines, and Hispanic passengers were included as minorities.

Table 4

PROPORTIONATE SHARE OF MILWAUKEE COUNTY BY DISABILITY STATUS, MINORITY STATUS, AND INCOME STATUS FROM THE 2010-2012 AMERICAN COMMUNITY SURVEY

Category	Residents with a Disability	Residents without a Disability	All Residents
All Residents	12.9	87.1	100.0
Minority Residents	48.9	45.7	46.1
Non-Minority Residents	51.1	54.3	53.9
Low-Income Residents	31.2	20.4	21.8
Non-Low-Income Residents	68.8	79.6	78.2

Source: SEWRPC and the U.S. Census Bureau

ASSESSMENT OF THE IMPACTS OF THE GO PASS PROGRAM

If implementing the *GO Pass* program does not require an increase in fares on the remainder of passengers, providing this benefit to either people aged 65 and older or people with disabilities would not cause a disparate impact on minority passengers or a disproportionate burden on low-income passengers. However, if implementing the *GO Pass* program does lead to a fare increase on other passengers, or if a fare increase is required for another reason in the future, a further fare equity analysis would need to be performed.

Although the specifics of the fare increase would need to be considered as well, a preliminary analysis of a potential fare increase is included here. In order to determine if a disparate impact would occur, the percent of all non-minority passengers receiving a hypothetical fare increase was divided by the percent of all minority

passengers receiving the same hypothetical fare increase. If the resulting ratio is less than 0.80, a disparate impact has occurred.

The data shown in Table 2 can be used to calculate that 98.5 percent of minority passengers are under age 65, while 94.5 percent of non-minority passengers are under age 65. Therefore, the ratio of the percent of non-minority passengers to the percent of minority passengers is 0.96, greater than 0.80. Similarly, 98.3 percent of low-income passengers are under 65, and 95.5 percent of non-low-income passengers are under 65. These results indicate that there may not be a disparate impact on minority passengers or a disproportionate burden on low-income passengers if fares are raised in the future.

Without specific information on the usage of MCTS fixed-route services by people with disabilities, it is difficult to determine if there may be expected to be a disparate impact on minority passengers or a disproportionate burden on low-income passengers if fares need to be raised in the future. However, assuming that the information on people with disabilities for the entire County is an adequate proxy for the demographics of people with disabilities on MCTS fixed-route services, there would not be expected to be a disparate impact on minority passengers or a disproportionate burden on low-income passengers due to providing the *GO Pass* program for MCTS passengers with disabilities.

POTENTIAL MODIFICATION OF THE *GO PASS* PROGRAM TO AVOID A DISPARATE IMPACT OR A DISPROPORTIONATE BURDEN

As long as fares do not need to be raised as a result of providing free fares to seniors and people with disabilities, there is no disparate impact or disproportionate burden from this program, and therefore no need to modify the program. If fares do need to be raised in the future, a future analysis would be needed to determine if a disparate impact on minority passengers or a disproportionate burden on low-income passengers would occur, and if the program would need to be modified to avoid it.

* * *

**Milwaukee County Transit System
Interoffice Communication**

To: Dan Boehm, Managing Director
Sandy Kellner, Chief Operating Officer

From: Jeff Sponcia, Manager of Planning

Subject: **Title VI Fare Equity Analysis of Proposed Fare Increases in 2017 Budget**

Date: June 23, 2016

CC: Tom Winter, Director of Schedule & Planning

BACKGROUND

A fare increase proposed for the 2017 Budget would raise M-Card fares for all single trips, premium single trips, seven-day passes and 31-day passes on fixed route services. Planning performed a Title VI Fare Equity Analysis to determine if a disparate impact for minority passengers or a disproportionate burden for low-income passengers would occur as a result.

CURRENT AND PROPOSED FARES

Under the proposed 2017 Milwaukee County Budget, fares would increase as shown below.

Fare Type	Current Fare	Proposed Fare	Percent Increase
Single-Ride M-Card Fare	\$1.75	\$2.00	14.3%
M-Card Premium Fare	\$2.35	\$2.70	14.9%
Seven-Day Pass	\$17.50	\$20.00	14.3%
31-Day Pass	\$64.00	\$73.00	14.1%

PROPORTIONATE SHARE OF MCTS RIDERSHIP BY MINORITY STATUS AND INCOME STATUS

According to a SEWRPC on board survey of riders from 2012, 60.2% of passengers are minorities while 39.8% are non-minorities. These results suggest there may be an overall disparate impact on minority passengers if fares are raised in 2017. Conversely, as 48.8% of passengers are low-income and 51.2% are non-low-income, these results indicate there may not be a disproportionate burden on low-income passengers if fares are raised in 2017.

**Proportionate Share of MCTS Ridership by Minority Status
and Income Status from SEWRPC On Board Survey**

Category	Percent
Minority Passengers	60.2%
Non-Minority Passengers	39.8%
Low-Income Passengers	48.8%
Non-Low-Income Passengers	51.2%

PROPORTIONATE SHARE OF MILWAUKEE COUNTY BY MINORITY STATUS AND INCOME STATUS

The data for Milwaukee County's population indicates that 46.4% of the county's population are minority residents while 53.6% are non-minority residents. This means there may not be a disparate impact on the county's entire minority population if fares are raised in 2017. Concurrently, the data also indicates that 21.9% of the county's population are low-income residents while 78.1% are non-low-income residents. This indicates there may not be a disproportionate burden on the county's entire low-income population if fares are raised in 2017.

Proportionate Share of Milwaukee County by Minority Status and Income Status from the 2012-2014 American Community Survey

Category	Percent
Minority Residents	46.4%
Non-Minority Residents	53.6%
Low-Income Residents	21.9%
Non-Low-Income Residents	78.1%

ASSESSMENT OF THE PROPOSED FARE INCREASE—MINORITY / NON-MINORITY PASSENGERS

Minority passengers who use seven-day passes would be impacted disparately as the impact ratio would be below 0.80 or four-fifths (see below). There would not be an impact on passengers who use M-Cards for single rides or 31-day passes as the impact ratio is above 0.80.

Passenger Fare Type	% Minority	% Non-Minority	Impact Ratio	Disproportionate Impact?
Single-Ride M-Card Passengers	23.6%	19.7%	0.83	No
Seven-Day Pass Passengers	28.0%	15.8%	0.56	Yes (below 0.80)
31-Day Pass Passengers	6.5%	11.5%	> 1.00	No
<i>Entire County Population</i>	<i>46.4%</i>	<i>53.6%</i>	<i>> 1.00</i>	<i>No</i>

ASSESSMENT OF THE PROPOSED FARE INCREASE—LOW-INCOME / NON-LOW-INCOME PASSENGERS

Low-income passengers who use M-Cards for single rides, seven-day passes or 31-day passes would not be disproportionately burdened by the proposed fare change.

Passenger Fare Type	% Low Income	% Non-Low Income	Impact Ratio	Disproportionate Burden?
Single-Ride M-Card Passengers	21.6%	23.1%	> 1.00	No
Seven-Day Pass Passengers	26.0%	23.2%	0.89	No
31-Day Pass Passengers	6.8%	8.9%	> 1.00	No
<i>Entire County Population</i>	<i>21.9%</i>	<i>78.1%</i>	<i>> 1.00</i>	<i>No</i>

REQUIREMENT TO MITIGATE DISPARATE IMPACTS / DISPROPORTIONATE BURDENS

It is recommended to reduce the percent of fare increase on seven-day passes so as to limit the disparate impact on minorities as much as possible.

**Milwaukee County Transit System
Interoffice Memorandum**

TO: File

FROM: Tom Winter, Director of Schedule and Planning

SUBJECT: SAFE Analysis – Elimination of Route 279 Menomonee Falls Industrial Park

DATE: August 28, 2016

The elimination of Route 279 (Menomonee Falls Shuttle) 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 279 was created using funds from a legal settlement between the Black Health Coalition of Wisconsin (BHCW) and Milwaukee Inner City Congregations Allied for Hope (MICAH) against the State of Wisconsin Department of Transportation (WisDOT) and the US Department of Transportation. Specifically, WisDOT agreed to provide \$11.5 million for new bus routes from the central city of Milwaukee (specific zip codes were identified) to areas in Waukesha or Washington counties or western Milwaukee County. These funds would be available until the completion of the Zoo Interchange freeway project (estimated to be Fall 2018). Routes 6 (New Berlin Industrial Park) and 61 (Appleton – Keefe) were also created from the settlement.

Route 279 was designed to provide transit access from the central city of Milwaukee to businesses in an industrial park in Waukesha County during shift time changes (Map 1). Service began in August 2014 on weekdays and Saturdays. Weekday ridership ranged from 70 to 80 rides/day while Saturday ridership averaged 25 rides/day. After one year of operation, Saturday service was discontinued due to very low ridership and productivity. In addition, the eastern segment from 32nd & Fond du Lac to Park Place & Liberty was eliminated to improve productivity and to allocate more funds to Routes 6 and 61. Passengers would be able to use the MCTS BlueLine (Fond du Lac - National) to get to Route 279 which would then shuttle them to the industrial park. A further change to Route 279 was made in December 2015 to serve a FedEx facility along the route. Despite these efforts, ridership remained within the same range of usage.

In the legal settlement, BHCW and MICAH agreed that a route may be modified or terminated after two years if ridership was insufficient to support continuation. If a route was eliminated, they would work with MCTS to identify a replacement route or expand service on other routes in the settlement. Based on the cost of operating Route 279 versus the ridership on the route, BHCW and MICAH decided it should be discontinued. The last day of service would be August 26, 2016.

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.

A GIS analysis of the BlueLine revealed that it predominantly, if not exclusively, travels through minority and low income census tracts (Maps 2 and 3). Consequently, the BlueLine would be defined as a minority and low income route. Given that Route 279 passengers transferred from the BlueLine, the former was also considered to be a minority and low income route. Consequently, it was deduced that the elimination of Route 279 would be a disparate impact on the minority population and a disproportionate burden on the low-income population.

MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS

The only way to avoid the elimination of Route 279 would be to secure a new source of funds. The most logical alternative sources of funds would be from Milwaukee County or Waukesha County. This would not be a viable option as neither have set aside funds in their 2016 budgets for Route 279.

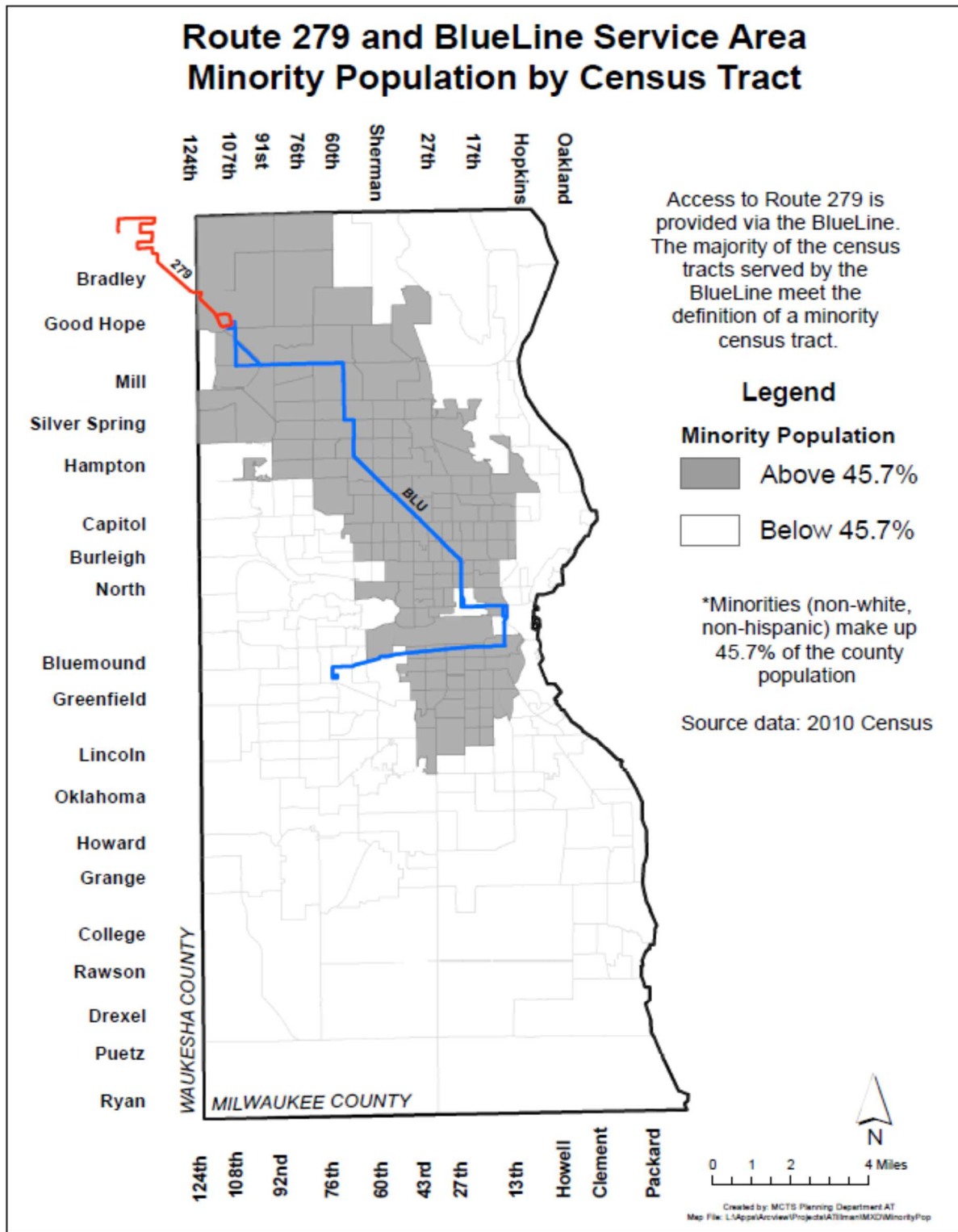
There are some options that would partially mitigate the impact of eliminating Route 279. Passengers may be able to ride MCTS Route 79 (Menomonee Falls Flyer) pull-out and pull-in buses as a reverse commute option from/to 35th Street & Fond du Lac to reach employers near the Pilgrim Road park & ride lot. This would require passengers walk or bike 1 to 2 miles to/from their destination. Route 223 (Park Place – Bradley Woods Shuttle) serves two large retail centers (Woodman’s and Sam’s Club) also served by Route 279. Route 223 connects with the BlueLine (Fond du Lac – National) at Park Place & Liberty. This option would also require passengers walk or bike 1 to 2 miles to/from their destination.

MCTS planners will be preparing a comprehensive analysis of all routes to improve the efficiency and cost effectiveness of the system. A part of this effort can include examining the feasibility of providing service to the industrial park formerly served by Route 279.

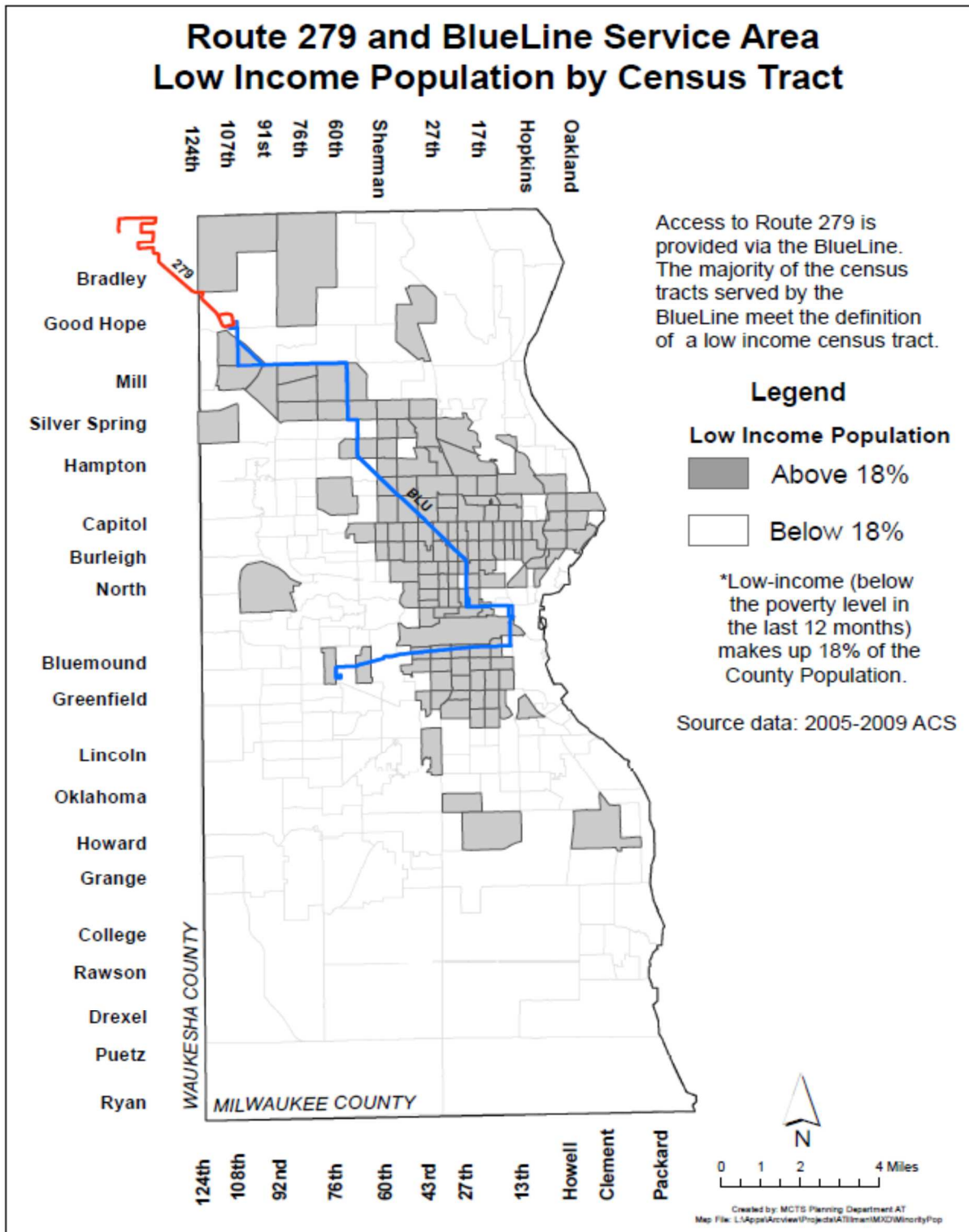
SUMMARY

- Given Route 279’s low ridership after two years of operation and the cost of operating this service, the route’s sponsors (BHCW and MICAH) decided that funds should stop being allocated to the route.
- The elimination of Route 279 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 the primary transit access to Route 279 is provided by the BlueLine, which itself serves a minority and low income population, the elimination of the former would be considered a disparate impact and a disproportionate burden on the minority and low income population, respectively.
- There are no alternative funds available to maintain Route 279 and avoid its elimination. MCTS does operate alternative service in the vicinity of the Route 279 (Routes 79 and 223) which would partially mitigate the elimination of the route. Both options would require passengers walk or bike 1 to 2 miles to/from their destination. MCTS will be performing a comprehensive analysis of all routes and can examine the feasibility of operating service to the industrial park. The cost of extending the route would still need to be resolved.
- Ultimately, the original goal of the legal settlement will continue to be met even with the elimination of Route 279. The bus hours from Route 279 will be transferred to either Route 6 or Route 61 and thus continue to provide transit service for minority and low income residents from the central city of Milwaukee to outlying job centers in Waukesha, Washington, or western Milwaukee County.

Map 2.
 Minority Population in Milwaukee County by Census Tract
 Route 279 and BlueLine Service Area



Map 3.
 Low Income Population in Milwaukee County by Census Tract
 Route 279 and BlueLine Service Area



**Milwaukee County Transit System
Interoffice Memorandum**

TO: File

FROM: Jeff Sponcia, Manager of Planning

SUBJECT: SAFE Analysis – Increase of Hours and Service Span on Route 64

DATE: April 28, 2017

The increase of service hours on Route 64 (S. 60th 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 64 (see Map 1) serves S. 60th Street from Greenfield Avenue to Grange Avenue and Hawley Road from Vliet Street to Greenfield Avenue. Its major destinations are Southridge Mall at Grange & Northway, Meijer at S. 60th & Layton Avenue, downtown West Allis at S. 60th & Greenfield the east end of Wauwatosa at N. 60th Street & Vliet Street.

Through the 16-DEC pick, Route 64 had less than attractive service hours and weekend service span. On weekdays, this route had approximately 29.1 in-service hours with a service span of 14.5 hours. On Saturdays and Sundays, Route 64 only operated with approximately 10.5 in-service hours with a service span of 10.5 hours—only one bus operated on this route on the weekends.

In the 17-MAR Pick, MCTS allocated additional service hours and increased the service span for weekdays, Saturdays and Sundays. Weekday in-service hours increased 24% to 36.2 while Saturday in-service hours increased 206% to 32.7 and Sunday in-service hours increased 175% to 28.9. Additionally, Route 64's service span increased by 24% to 18 hours on weekdays, by 62% to 17 hours on Saturdays and by 43% to 15 hours on Sundays. Here is a summary of these changes:

Route 64			
In-Service Hours	16-DEC	17-MAR	% Change
Weekday	29.1	36.2	24.4%
Saturday	10.7	32.7	205.6%
Sunday	10.5	28.9	175.2%

Route 64			
Service Span	16-DEC	17-MAR	% Change
Weekday	14.5	18.0	24.1%
Saturday	10.5	17.0	61.9%
Sunday	10.5	15.0	42.9%

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.

Route	Before			
	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)
64 - Current	26,126	11.2%	24.0%	6,878
64 - Increased Hours & Span	0			0
All Changes	26,126	11.2%	24.0%	6,878

Route	After			
	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)
64 - Current	0			0
64 - Increased Hours & Span	26,126	11.2%	24.0%	9,571
All Changes	26,126	11.2%	24.0%	9,571

Route	Difference				
	People-Trips (Population * Trips)	Low Income People-Trips	Minority People-Trips	Change Borne By Low Income	Change Borne by Minorities
64 - Current	-179,694,628	-20,139,990	-43,118,182	11.2%	24.0%
64 - Increased Hours & Span	250,051,946	28,025,567	60,000,599	11.2%	24.0%
All Changes	70,357,318	7,885,577	16,882,417	11.2%	24.0%

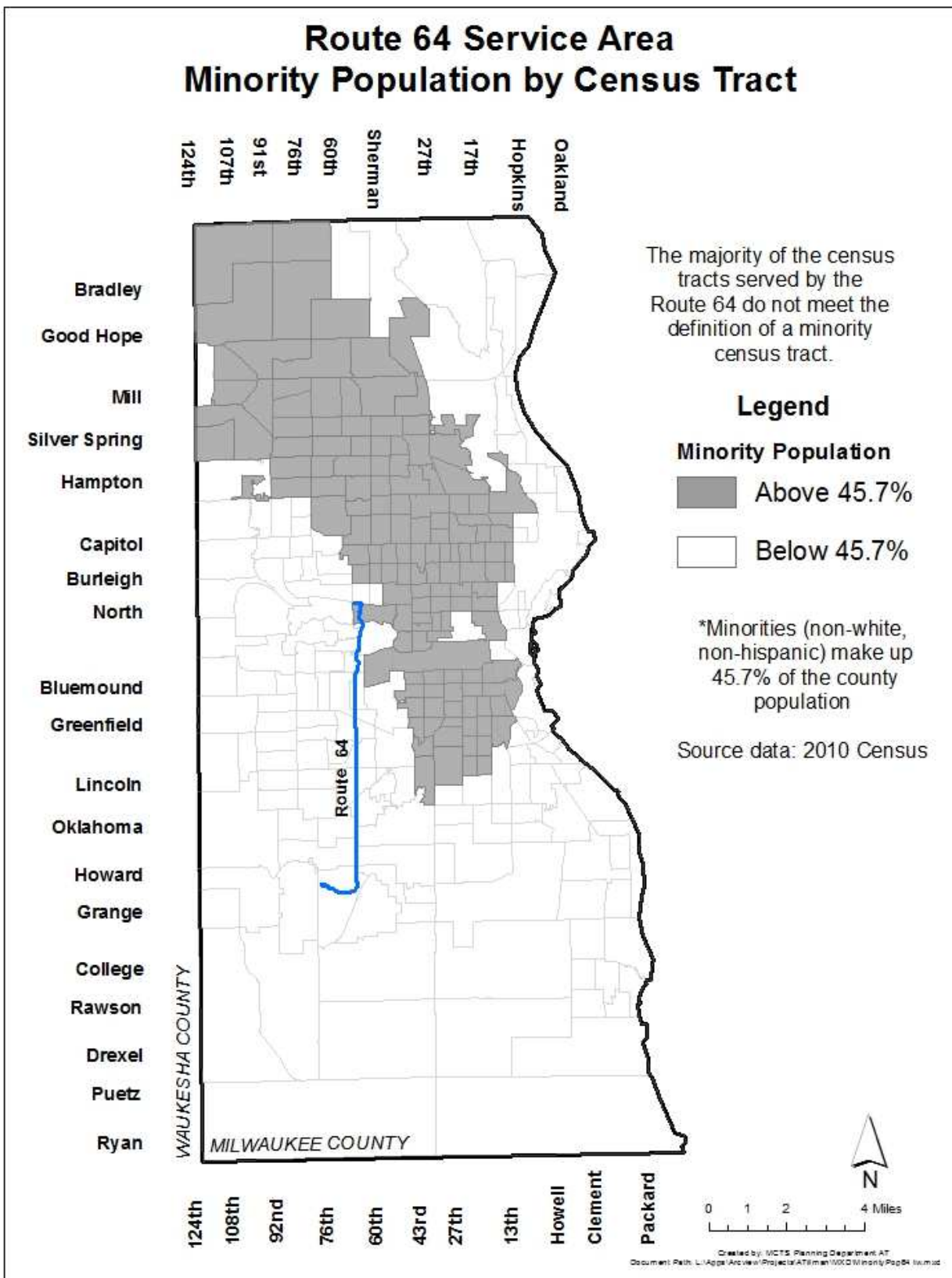
	Low Income	Minority
Change Borne By	11.2%	24.0%
Area Average	21.6%	46.0%
Delta	-10.4%	-22.0%

A Title VI analysis of Route 64 using the data above and GIS Maps 2 and 3 below revealed that the change borne by minority and low-income populations are less than the entire Milwaukee County Transit System’s service area’s average and thus, are not determined to have a disparate impact minority populations or a disproportionate burden on low-income populations.

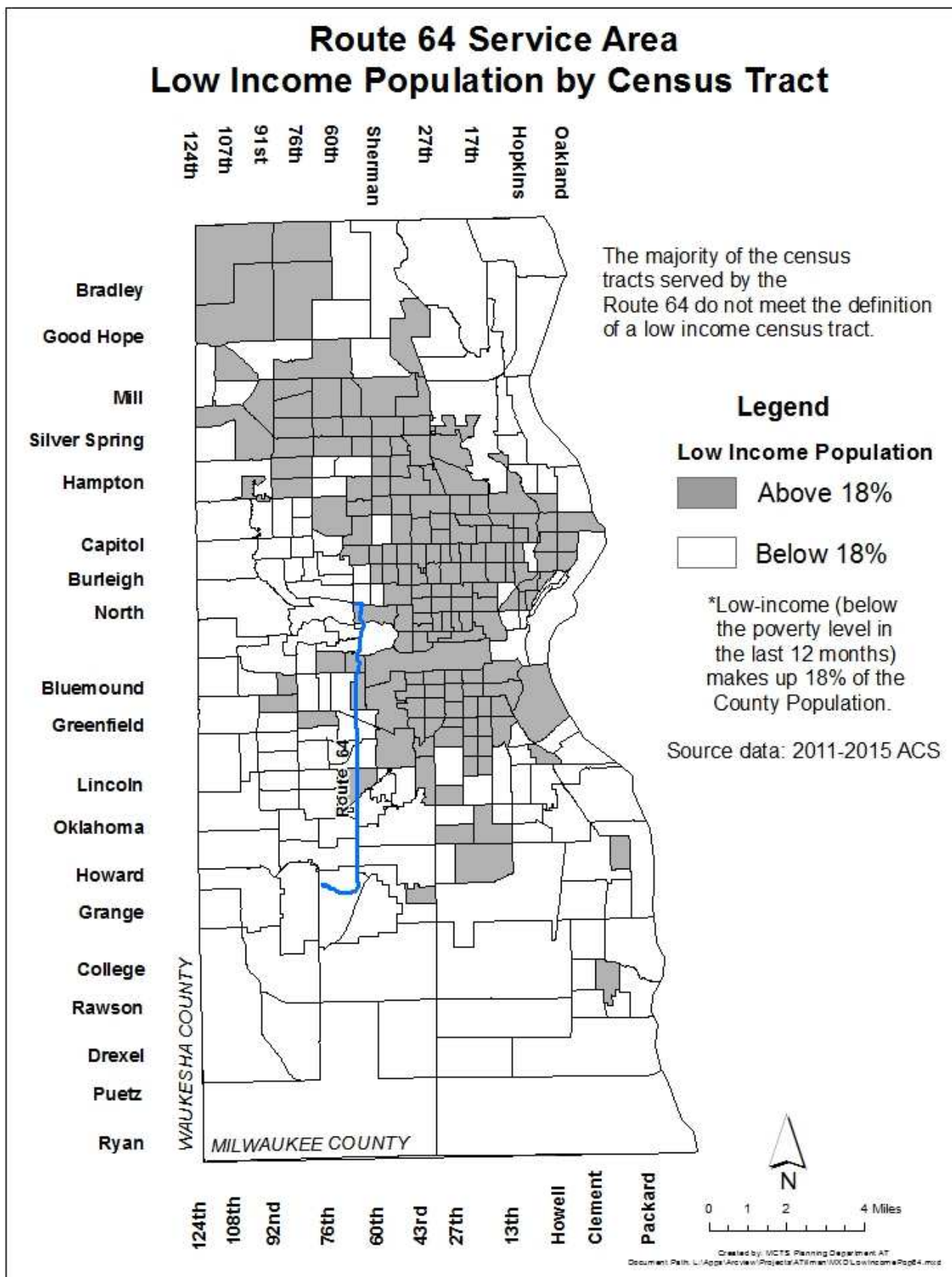


Map 1.

Map 2.



Map 3.



Milwaukee County Population and Race Distribution Chart 2015

Census Tract	2015 Population	White	Black		American Indian and		Asian		Native Hawaiian		Other		Muliracial		Hispanic or Latino		Total Minority	
			#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
000101	4886	1214	3158	64.6%	0	0.0%	87	1.8%	0	0.0%	361	7.4%	66	1.4%	344	7.0%	75.2%	
000102	3726	969	2341	62.8%	2	0.1%	145	3.9%	0	0.0%	0	0.0%	184	4.9%	152	4.1%	74.0%	
000201	5228	1197	2711	51.9%	0	0.0%	245	4.7%	0	0.0%	469	9.0%	88	1.7%	987	18.9%	77.1%	
000202	6238	2906	2597	41.6%	103	1.7%	243	3.9%	0	0.0%	0	0.0%	202	3.2%	218	3.5%	53.4%	
000301	1503	1220	190	12.6%	0	0.0%	68	4.5%	0	0.0%	11	0.7%	14	0.9%	0	0.0%	18.8%	
000302	3200	479	2382	74.4%	10	0.3%	35	1.1%	0	0.0%	34	1.1%	177	5.5%	135	4.2%	85.0%	
000303	1841	734	935	50.8%	0	0.0%	76	4.1%	0	0.0%	30	1.6%	50	2.7%	27	1.5%	60.1%	
000304	3174	1342	1272	40.1%	0	0.0%	431	13.6%	0	0.0%	14	0.4%	64	2.0%	65	2.0%	57.7%	
000400	2472	799	1310	53.0%	43	1.7%	0	0.0%	0	0.0%	64	2.6%	214	8.7%	144	5.8%	67.7%	
000501	3718	1585	1636	44.0%	0	0.0%	66	1.8%	4	0.1%	56	1.5%	212	5.7%	215	5.8%	57.4%	
000502	4835	648	3540	73.2%	0	0.0%	277	5.7%	0	0.0%	65	1.3%	111	2.3%	259	5.4%	86.6%	
000600	6630	1275	3746	56.5%	0	0.0%	1162	17.5%	0	0.0%	0	0.0%	381	5.7%	81	1.2%	80.8%	
000700	3456	1277	2049	59.3%	0	0.0%	0	0.0%	0	0.0%	60	1.7%	69	2.0%	52	1.5%	63.0%	
000800	4808	1116	3059	63.6%	23	0.5%	246	5.1%	0	0.0%	28	0.6%	153	3.2%	220	4.6%	76.8%	
000900	3915	655	3012	76.9%	14	0.4%	0	0.0%	0	0.0%	0	0.0%	183	4.7%	111	2.8%	83.3%	
001000	3616	399	2863	79.2%	1	0.0%	150	4.1%	0	0.0%	17	0.5%	117	3.2%	91	2.5%	89.0%	
001100	2217	326	1807	81.5%	4	0.2%	0	0.0%	0	0.0%	15	0.7%	52	2.3%	28	1.3%	85.3%	
001200	3231	148	1782	55.2%	5	0.2%	941	29.1%	0	0.0%	194	6.0%	128	4.0%	226	7.0%	95.4%	
001300	4382	256	3103	70.8%	0	0.0%	792	18.1%	0	0.0%	47	1.1%	24	0.5%	207	4.7%	94.2%	
001400	2330	273	1386	59.5%	30	1.3%	530	22.7%	0	0.0%	7	0.3%	44	1.9%	86	3.7%	88.3%	
001500	3246	700	1667	51.4%	43	1.3%	791	24.4%	0	0.0%	0	0.0%	45	1.4%	0	0.0%	78.4%	
001600	2940	505	2241	76.2%	0	0.0%	94	3.2%	0	0.0%	1	0.0%	56	1.9%	44	1.5%	82.8%	
001700	4884	1040	3213	65.8%	63	1.3%	230	4.7%	0	0.0%	185	3.8%	17	0.3%	321	6.6%	78.7%	
001800	3021	520	2158	71.4%	0	0.0%	114	3.8%	0	0.0%	31	1.0%	41	1.4%	167	5.5%	82.8%	
001900	2885	396	2351	81.5%	23	0.8%	6	0.2%	0	0.0%	0	0.0%	95	3.3%	14	0.5%	86.3%	
002000	2431	245	2026	83.3%	5	0.2%	29	1.2%	0	0.0%	5	0.2%	93	3.8%	38	1.6%	89.9%	
002100	2107	117	1942	92.2%	0	0.0%	0	0.0%	0	0.0%	34	1.6%	14	0.7%	38	1.8%	94.4%	
002200	1633	556	832	50.9%	15	0.9%	0	0.0%	0	0.0%	13	0.8%	0	0.0%	230	14.1%	66.0%	
002300	4055	141	3682	90.8%	0	0.0%	8	0.2%	0	0.0%	28	0.7%	85	2.1%	139	3.4%	96.5%	
002400	2047	84	1837	89.7%	0	0.0%	100	4.9%	0	0.0%	0	0.0%	18	0.9%	8	0.4%	95.9%	
002500	2102	165	1618	77.0%	0	0.0%	0	0.0%	0	0.0%	63	3.0%	134	6.4%	193	9.2%	92.2%	
002600	2942	204	2708	92.0%	0	0.0%	0	0.0%	0	0.0%	15	0.5%	14	0.5%	35	1.2%	93.1%	
002700	2120	230	1824	86.0%	0	0.0%	25	1.2%	0	0.0%	0	0.0%	41	1.9%	0	0.0%	89.2%	
002800	2340	146	1972	84.3%	6	0.3%	35	1.5%	0	0.0%	0	0.0%	85	3.6%	96	4.1%	93.8%	
002900	2191	240	1628	74.3%	17	0.8%	136	6.2%	0	0.0%	67	3.1%	82	3.7%	102	4.7%	89.0%	
003000	4136	648	3017	72.9%	0	0.0%	142	3.4%	0	0.0%	43	1.0%	226	5.5%	71	1.7%	84.3%	
003100	3897	336	2817	72.3%	45	1.2%	379	9.7%	0	0.0%	57	1.5%	189	4.8%	143	3.7%	91.4%	
003200	2949	456	1842	62.5%	0	0.0%	443	15.0%	0	0.0%	106	3.6%	38	1.3%	143	4.8%	84.5%	
003300	5000	881	3331	66.6%	0	0.0%	427	8.5%	7	0.1%	107	2.1%	128	2.6%	234	4.7%	82.4%	
003400	5841	1995	3162	54.1%	10	0.2%	293	5.0%	0	0.0%	226	3.9%	124	2.1%	272	4.7%	65.8%	
003500	4149	588	3228	77.8%	0	0.0%	213	5.1%	11	0.3%	39	0.9%	43	1.0%	35	0.8%	85.8%	
003600	2310	226	1970	85.3%	10	0.4%	33	1.4%	0	0.0%	16	0.7%	22	1.0%	49	2.1%	90.2%	
003700	1994	319	1565	78.5%	0	0.0%	26	1.3%	0	0.0%	0	0.0%	78	3.9%	6	0.3%	84.0%	
003800	2521	129	2222	88.1%	2	0.1%	0	0.0%	0	0.0%	105	4.2%	50	2.0%	118	4.7%	94.9%	
003900	2775	30	2597	93.6%	12	0.4%	0	0.0%	0	0.0%	22	0.8%	56	2.0%	103	3.7%	98.9%	
004000	2644	127	2445	92.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	70	2.6%	2	0.1%	95.2%	
004100	2415	170	2056	85.1%	0	0.0%	0	0.0%	0	0.0%	22	0.9%	146	6.0%	43	1.8%	93.0%	
004200	3273	53	3196	97.6%	1	0.0%	0	0.0%	0	0.0%	0	0.0%	10	0.3%	13	0.4%	98.4%	
004300	4404	112	4104	93.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	54	1.2%	134	3.0%	97.5%	
004400	3443	764	2255	65.5%	10	0.3%	106	3.1%	0	0.0%	14	0.4%	87	2.5%	221	6.4%	77.8%	
004500	2246	38	2052	91.4%	1	0.0%	29	1.3%	0	0.0%	106	4.7%	3	0.1%	142	6.3%	98.3%	
004600	3091	43	3012	97.4%	0	0.0%	8	0.3%	0	0.0%	0	0.0%	15	0.5%	13	0.4%	98.6%	
004700	3928	23	3881	98.8%	0	0.0%	0	0.0%	6	0.2%	0	0.0%	11	0.3%	36	0.9%	99.4%	
004800	4012	212	3583	89.3%	23	0.6%	15	0.4%	0	0.0%	14	0.3%	94	2.3%	71	1.8%	94.7%	
004900	4246	960	3018	71.1%	0	0.0%	0	0.0%	0	0.0%	17	0.4%	227	5.3%	76	1.8%	77.4%	
005000	5198	1100	3477	66.9%	17	0.3%	201	3.9%	0	0.0%	30	0.6%	196	3.8%	207	4.0%	78.8%	
005100	3723	524	2975	79.9%	0	0.0%	0	0.0%	0	0.0%	12	0.3%	134	3.6%	129	3.5%	85.9%	
005200	1671	960	530	31.7%	0	0.0%	55	3.3%	0	0.0%	25	1.5%	51	3.1%	75	4.5%	42.5%	
005300	1994	1177	452	22.7%	19	1.0%	0	0.0%	0	0.0%	37	1.9%	143	7.2%	203	10.2%	41.0%	
005400	3972	3122	622	15.7%	0	0.0%	84	2.1%	0	0.0%	6	0.2%	85	2.1%	91	2.3%	21.4%	
005500	3218	2445	446	13.9%	0	0.0%	56	1.7%	4	0.1%	32	1.0%	49	1.5%	218	6.8%	24.0%	
005600	2216	1902	102	4.6%	10	0.5%	52	2.3%	6	0.3%	47	2.1%	25	1.1%	119	5.4%	14.2%	

005700	2358	1885	407	17.3%	0	0.0%	0	0.0%	0	0.0%	7	0.3%	20	0.8%	46	2.0%	20.1%
005800	3309	2144	839	25.4%	9	0.3%	0	0.0%	0	0.0%	21	0.6%	78	2.4%	259	7.8%	35.2%
005900	3458	693	2096	60.6%	19	0.5%	82	2.4%	0	0.0%	300	8.7%	45	1.3%	523	15.1%	80.0%
006000	2699	122	2479	91.8%	4	0.1%	8	0.3%	0	0.0%	9	0.3%	34	1.3%	52	1.9%	95.5%
006100	2207	330	1669	75.6%	3	0.1%	30	1.4%	0	0.0%	73	3.3%	97	4.4%	82	3.7%	85.0%
006200	2390	55	2262	94.6%	0	0.0%	48	2.0%	0	0.0%	21	0.9%	0	0.0%	18	0.8%	97.7%
006300	2390	20	2296	96.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	45	1.9%	76	3.2%	99.2%
006400	2421	2	2341	96.7%	0	0.0%	10	0.4%	0	0.0%	0	0.0%	41	1.7%	27	1.1%	99.9%
006500	2094	61	1883	89.9%	3	0.1%	74	3.5%	0	0.0%	0	0.0%	5	0.2%	68	3.2%	97.1%
006600	2947	15	2560	86.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	168	5.7%	219	7.4%	99.5%
006700	1275	30	1224	96.0%	0	0.0%	0	0.0%	0	0.0%	5	0.4%	11	0.9%	43	3.4%	97.6%
006800	2608	44	2445	93.8%	18	0.7%	0	0.0%	0	0.0%	74	2.8%	2	0.1%	133	5.1%	98.3%
006900	3155	71	2601	82.4%	0	0.0%	0	0.0%	0	0.0%	188	6.0%	36	1.1%	451	14.3%	97.7%
007000	2690	96	2180	81.0%	10	0.4%	41	1.5%	0	0.0%	20	0.7%	100	3.7%	303	11.3%	96.4%
007100	2069	1377	385	18.6%	0	0.0%	42	2.0%	0	0.0%	81	3.9%	92	4.4%	218	10.5%	33.4%
007200	3023	1985	696	23.0%	0	0.0%	7	0.2%	0	0.0%	84	2.8%	171	5.7%	187	6.2%	34.3%
007300	2657	1904	454	17.1%	0	0.0%	44	1.7%	0	0.0%	11	0.4%	79	3.0%	176	6.6%	28.3%
007400	3676	2908	269	7.3%	37	1.0%	98	2.7%	0	0.0%	22	0.6%	189	5.1%	164	4.5%	20.9%
007500	2528	2321	56	2.2%	12	0.5%	47	1.9%	0	0.0%	9	0.4%	26	1.0%	66	2.6%	8.2%
007600	3536	2942	169	4.8%	0	0.0%	185	5.2%	0	0.0%	38	1.1%	67	1.9%	162	4.6%	16.8%
007700	3835	3211	194	5.1%	50	1.3%	146	3.8%	0	0.0%	0	0.0%	94	2.5%	140	3.7%	16.3%
007800	3650	3122	72	2.0%	9	0.2%	113	3.1%	0	0.0%	65	1.8%	150	4.1%	184	5.0%	14.5%
007900	2245	1621	248	11.0%	3	0.1%	48	2.1%	0	0.0%	62	2.8%	171	7.6%	164	7.3%	27.8%
008000	1957	1137	505	25.8%	0	0.0%	30	1.5%	0	0.0%	85	4.3%	100	5.1%	192	9.8%	41.9%
008100	1290	165	854	66.2%	18	1.4%	0	0.0%	0	0.0%	35	2.7%	70	5.4%	224	17.4%	82.2%
008400	1338	0	1198	89.5%	0	0.0%	0	0.0%	0	0.0%	33	2.5%	59	4.4%	81	6.1%	100.0%
008500	1491	14	1428	95.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	41	2.7%	16	1.1%	99.1%
008600	1032	10	996	96.5%	15	1.5%	0	0.0%	0	0.0%	0	0.0%	7	0.7%	4	0.4%	99.0%
008700	1503	21	1462	97.3%	0	0.0%	20	1.3%	0	0.0%	0	0.0%	0	0.0%	86	5.7%	98.6%
008800	1977	16	1936	97.9%	0	0.0%	0	0.0%	0	0.0%	5	0.3%	20	1.0%	17	0.9%	99.2%
008900	1233	87	1036	84.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	15	1.2%	95	7.7%	92.9%
009000	2546	112	2319	91.1%	2	0.1%	102	4.0%	0	0.0%	11	0.4%	0	0.0%	11	0.4%	95.6%
009100	2179	227	1627	74.7%	0	0.0%	94	4.3%	0	0.0%	85	3.9%	127	5.8%	104	4.8%	89.6%
009200	1924	489	1196	62.2%	31	1.6%	58	3.0%	0	0.0%	1	0.1%	93	4.8%	57	3.0%	74.6%
009300	2461	1287	862	35.0%	3	0.1%	0	0.0%	0	0.0%	32	1.3%	144	5.9%	153	6.2%	47.7%
009400	2820	1715	554	19.6%	41	1.5%	0	0.0%	0	0.0%	249	8.8%	111	3.9%	399	14.1%	39.2%
009500	2135	1432	430	20.1%	8	0.4%	25	1.2%	0	0.0%	21	1.0%	137	6.4%	103	4.8%	32.9%
009600	2212	93	1633	73.8%	31	1.4%	100	4.5%	0	0.0%	75	3.4%	38	1.7%	317	14.3%	95.8%
009700	1745	95	991	56.8%	0	0.0%	612	35.1%	0	0.0%	0	0.0%	4	0.2%	48	2.8%	94.6%
009800	1479	40	1252	84.7%	4	0.3%	183	12.4%	0	0.0%	0	0.0%	0	0.0%	15	1.0%	97.3%
009900	1179	21	1145	97.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	5	0.4%	8	0.7%	98.2%
010600	1099	318	455	41.4%	1	0.1%	0	0.0%	0	0.0%	134	12.2%	73	6.6%	252	22.9%	71.1%
010700	2362	1596	295	12.5%	0	0.0%	30	1.3%	0	0.0%	175	7.4%	73	3.1%	368	15.6%	32.4%
010800	2486	2167	165	6.6%	0	0.0%	28	1.1%	10	0.4%	17	0.7%	39	1.6%	74	3.0%	12.8%
011000	3264	2621	361	11.1%	0	0.0%	187	5.7%	0	0.0%	0	0.0%	67	2.1%	28	0.9%	19.7%
011100	1625	1368	71	4.4%	0	0.0%	60	3.7%	0	0.0%	39	2.4%	46	2.8%	80	4.9%	15.8%
011200	2269	1743	290	12.8%	0	0.0%	28	1.2%	0	0.0%	44	1.9%	46	2.0%	151	6.7%	23.2%
011300	1749	1401	167	9.5%	0	0.0%	25	1.4%	0	0.0%	72	4.1%	30	1.7%	126	7.2%	19.9%
011400	1378	1087	228	16.5%	0	0.0%	12	0.9%	0	0.0%	13	0.9%	10	0.7%	41	3.0%	21.1%
012200	2643	273	1233	46.7%	60	2.3%	869	32.9%	0	0.0%	5	0.2%	131	5.0%	83	3.1%	89.7%
012300	998	95	748	74.9%	0	0.0%	46	4.6%	0	0.0%	35	3.5%	25	2.5%	77	7.7%	90.5%
012400	2640	1170	904	34.2%	38	1.4%	361	13.7%	0	0.0%	57	2.2%	53	2.0%	120	4.5%	55.7%
012500	2170	1899	144	6.6%	0	0.0%	33	1.5%	0	0.0%	9	0.4%	40	1.8%	54	2.5%	12.5%
012600	2439	1916	70	2.9%	0	0.0%	73	3.0%	0	0.0%	8	0.3%	111	4.6%	269	11.0%	21.4%
012700	1307	1093	21	1.6%	11	0.8%	11	0.8%	3	0.2%	0	0.0%	17	1.3%	154	11.8%	16.4%
012800	3194	2339	111	3.5%	4	0.1%	128	4.0%	0	0.0%	152	4.8%	29	0.9%	583	18.3%	26.8%
012900	3059	2272	198	6.5%	0	0.0%	61	2.0%	0	0.0%	51	1.7%	97	3.2%	532	17.4%	25.7%
013000	1940	1149	138	7.1%	75	3.9%	17	0.9%	0	0.0%	26	1.3%	69	3.6%	508	26.2%	40.8%
013300	1092	412	361	33.1%	0	0.0%	143	13.1%	0	0.0%	85	7.8%	35	3.2%	141	12.9%	62.3%
013400	2357	456	1202	51.0%	0	0.0%	37	1.6%	0	0.0%	179	7.6%	275	11.7%	387	16.4%	80.7%
013500	1986	342	1312	66.1%	0	0.0%	38	1.9%	0	0.0%	58	2.9%	50	2.5%	244	12.3%	82.8%
013600	2556	250	1824	71.4%	12	0.5%	3	0.1%	0	0.0%	20	0.8%	51	2.0%	445	17.4%	90.2%
013700	1646	191	1133	68.8%	4	0.2%	115	7.0%	0	0.0%	41	2.5%	44	2.7%	159	9.7%	88.4%
014100	1596	224	1282	80.3%	4	0.3%	0	0.0%	0	0.0%	6	0.4%	0	0.0%	99	6.2%	86.0%
014300	2479	1935	98	4.0%	13	0.5%	170	6.9%	0	0.0%	59	2.4%	28	1.1%	244	9.8%	21.9%
014400	2784	2125	145	5.2%	21	0.8%	287	10.3%	0	0.0%	37	1.3%	30	1.1%	176	6.3%	23.7%
014600	3954	2518	705	17.8%	24	0.6%	339	8.6%	0	0.0%	53	1.3%	121	3.1%	240	6.1%	36.3%
014700	3387	1899	876	25.9%	8	0.2%	238	7.0%	8	0.2%	93	2.7%	55	1.6%	299	8.8%	43.9%

014800	2001	850	742	37.1%	28	1.4%	68	3.4%	0	0.0%	167	8.3%	88	4.4%	239	11.9%	57.5%
014900	1541	499	677	43.9%	0	0.0%	28	1.8%	0	0.0%	41	2.7%	58	3.8%	287	18.6%	67.6%
015700	2979	451	309	10.4%	0	0.0%	0	0.0%	0	0.0%	1352	45.4%	0	0.0%	2219	74.5%	84.9%
015800	2890	440	266	9.2%	19	0.7%	150	5.2%	0	0.0%	1369	47.4%	9	0.3%	1978	68.4%	84.8%
015900	3869	561	523	13.5%	106	2.7%	150	3.9%	0	0.0%	1005	26.0%	41	1.1%	2498	64.6%	85.5%
016000	3306	434	293	8.9%	0	0.0%	483	14.6%	0	0.0%	704	21.3%	116	3.5%	1997	60.4%	86.9%
016100	3607	738	66	1.8%	38	1.1%	13	0.4%	0	0.0%	756	21.0%	95	2.6%	2657	73.7%	79.5%
016200	3082	508	287	9.3%	52	1.7%	60	1.9%	0	0.0%	708	23.0%	35	1.1%	2140	69.4%	83.5%
016300	4929	665	472	9.6%	60	1.2%	133	2.7%	0	0.0%	2496	50.6%	19	0.4%	3605	73.1%	86.5%
016400	4231	355	305	7.2%	44	1.0%	23	0.5%	0	0.0%	2571	60.8%	50	1.2%	3421	80.9%	91.6%
016500	2258	239	128	5.7%	23	1.0%	0	0.0%	0	0.0%	1164	51.6%	6	0.3%	1862	82.5%	89.4%
016600	2034	394	544	26.7%	4	0.2%	5	0.2%	0	0.0%	637	31.3%	51	2.5%	1010	49.7%	80.6%
016700	3257	211	384	11.8%	8	0.2%	72	2.2%	0	0.0%	1762	54.1%	0	0.0%	2590	79.5%	93.5%
016800	3339	352	563	16.9%	12	0.4%	83	2.5%	0	0.0%	1437	43.0%	87	2.6%	2252	67.4%	89.5%
016900	3916	598	239	6.1%	65	1.7%	0	0.0%	0	0.0%	1449	37.0%	44	1.1%	2997	76.5%	84.7%
017000	5744	1028	213	3.7%	121	2.1%	86	1.5%	0	0.0%	1968	34.3%	150	2.6%	4146	72.2%	82.1%
017100	2949	557	152	5.2%	14	0.5%	196	6.6%	0	0.0%	665	22.6%	29	1.0%	2001	67.9%	81.1%
017200	2570	522	106	4.1%	0	0.0%	38	1.5%	0	0.0%	455	17.7%	21	0.8%	1967	76.5%	79.7%
017300	4073	523	325	8.0%	8	0.2%	33	0.8%	4	0.1%	818	20.1%	41	1.0%	3158	77.5%	87.2%
017400	3091	386	271	8.8%	29	0.9%	60	1.9%	0	0.0%	785	25.4%	59	1.9%	2319	75.0%	87.5%
017500	4027	575	764	19.0%	0	0.0%	44	1.1%	0	0.0%	601	14.9%	262	6.5%	2610	64.8%	85.7%
017600	3048	366	226	7.4%	91	3.0%	69	2.3%	0	0.0%	765	25.1%	96	3.1%	2203	72.3%	88.0%
017900	3077	2437	58	1.9%	61	2.0%	44	1.4%	5	0.2%	28	0.9%	68	2.2%	404	13.1%	20.8%
018000	2952	2312	38	1.3%	24	0.8%	27	0.9%	0	0.0%	65	2.2%	26	0.9%	505	17.1%	21.7%
018100	1703	1398	97	5.7%	18	1.1%	55	3.2%	0	0.0%	0	0.0%	58	3.4%	77	4.5%	17.9%
018200	1741	1615	0	0.0%	0	0.0%	32	1.8%	0	0.0%	0	0.0%	4	0.2%	90	5.2%	7.2%
018300	2526	2056	24	1.0%	23	0.9%	0	0.0%	0	0.0%	0	0.0%	107	4.2%	316	12.5%	18.6%
018400	1391	1307	0	0.0%	0	0.0%	17	1.2%	0	0.0%	5	0.4%	16	1.2%	51	3.7%	6.0%
018500	1903	1260	0	0.0%	29	1.5%	13	0.7%	0	0.0%	112	5.9%	8	0.4%	593	31.2%	33.8%
018600	2946	657	274	9.3%	48	1.6%	1	0.0%	0	0.0%	420	14.3%	131	4.4%	1927	65.4%	77.7%
018700	3553	907	210	5.9%	0	0.0%	77	2.2%	0	0.0%	634	17.8%	0	0.0%	2393	67.4%	74.5%
018800	2313	289	156	6.7%	18	0.8%	0	0.0%	0	0.0%	340	14.7%	37	1.6%	1842	79.6%	87.5%
018900	1965	657	34	1.7%	0	0.0%	0	0.0%	0	0.0%	146	7.4%	37	1.9%	1218	62.0%	66.6%
019000	4867	3334	381	7.8%	11	0.2%	7	0.1%	0	0.0%	122	2.5%	176	3.6%	970	19.9%	31.5%
019100	3701	2181	285	7.7%	6	0.2%	136	3.7%	3	0.1%	121	3.3%	105	2.8%	995	26.9%	41.1%
019200	3220	2278	94	2.9%	10	0.3%	28	0.9%	0	0.0%	206	6.4%	161	5.0%	653	20.3%	29.3%
019300	2623	2014	59	2.2%	66	2.5%	45	1.7%	0	0.0%	16	0.6%	30	1.1%	409	15.6%	23.2%
019400	3925	3181	116	3.0%	15	0.4%	0	0.0%	0	0.0%	118	3.0%	70	1.8%	536	13.7%	19.0%
019500	3559	3011	0	0.0%	25	0.7%	63	1.8%	0	0.0%	54	1.5%	68	1.9%	392	11.0%	15.4%
019600	3565	2838	264	7.4%	0	0.0%	92	2.6%	0	0.0%	0	0.0%	41	1.2%	344	9.6%	20.4%
019700	5626	4059	163	2.9%	39	0.7%	224	4.0%	0	0.0%	81	1.4%	165	2.9%	976	17.3%	27.9%
019800	5249	3601	273	5.2%	0	0.0%	87	1.7%	0	0.0%	105	2.0%	186	3.5%	1102	21.0%	31.4%
019900	3922	2465	331	8.4%	38	1.0%	108	2.8%	0	0.0%	32	0.8%	107	2.7%	899	22.9%	37.1%
020000	3508	1542	599	17.1%	27	0.8%	284	8.1%	0	0.0%	87	2.5%	115	3.3%	989	28.2%	56.0%
020100	3644	1488	314	8.6%	40	1.1%	49	1.3%	0	0.0%	57	1.6%	49	1.3%	1704	46.8%	59.2%
020200	3125	1592	162	5.2%	8	0.3%	177	5.7%	0	0.0%	166	5.3%	94	3.0%	1092	34.9%	49.1%
020300	4061	1904	239	5.9%	8	0.2%	53	1.3%	0	0.0%	363	8.9%	43	1.1%	1816	44.7%	53.1%
020400	3525	946	116	3.3%	0	0.0%	46	1.3%	0	0.0%	576	16.3%	67	1.9%	2330	66.1%	73.2%
020500	3259	1010	21	0.6%	24	0.7%	18	0.6%	0	0.0%	310	9.5%	77	2.4%	2129	65.3%	69.0%
020600	3580	2812	47	1.3%	46	1.3%	18	0.5%	0	0.0%	63	1.8%	76	2.1%	582	16.3%	21.5%
020700	4172	3671	24	0.6%	29	0.7%	102	2.4%	0	0.0%	47	1.1%	62	1.5%	306	7.3%	12.0%
020800	3054	2599	40	1.3%	1	0.0%	94	3.1%	0	0.0%	95	3.1%	111	3.6%	185	6.1%	14.9%
020900	2641	1984	53	2.0%	7	0.3%	18	0.7%	0	0.0%	8	0.3%	110	4.2%	496	18.8%	24.9%
021000	2347	1806	62	2.6%	26	1.1%	36	1.5%	0	0.0%	47	2.0%	36	1.5%	381	16.2%	23.1%
021100	1372	1065	6	0.4%	7	0.5%	13	0.9%	20	1.5%	58	4.2%	48	3.5%	213	15.5%	22.4%
021200	2237	1609	69	3.1%	19	0.8%	81	3.6%	0	0.0%	39	1.7%	17	0.8%	456	20.4%	28.1%
021300	1697	899	259	15.3%	0	0.0%	7	0.4%	0	0.0%	66	3.9%	56	3.3%	486	28.6%	47.0%
021400	3639	1515	189	5.2%	19	0.5%	369	10.1%	0	0.0%	17	0.5%	301	8.3%	1293	35.5%	58.4%
021500	2900	1919	113	3.9%	5	0.2%	140	4.8%	0	0.0%	79	2.7%	247	8.5%	476	16.4%	33.8%
021600	4580	3200	160	3.5%	8	0.2%	247	5.4%	0	0.0%	91	2.0%	205	4.5%	760	16.6%	30.1%
021700	6961	5003	102	1.5%	0	0.0%	327	4.7%	0	0.0%	196	2.8%	80	1.1%	1500	21.5%	28.1%
021800	2442	1662	90	3.7%	57	2.3%	76	3.1%	0	0.0%	73	3.0%	93	3.8%	476	19.5%	31.9%
030100	4449	3885	113	2.5%	39	0.9%	211	4.7%	8	0.2%	11	0.2%	77	1.7%	121	2.7%	12.7%
035100	2295	2215	4	0.2%	0	0.0%	4	0.2%	0	0.0%	5	0.2%	53	2.3%	14	0.6%	3.5%
035200	4414	3813	207	4.7%	0	0.0%	164	3.7%	0	0.0%	0	0.0%	131	3.0%	99	2.2%	13.6%
040100	1472	1195	81	5.5%	12	0.8%	88	6.0%	0	0.0%	16	1.1%	50	3.4%	43	2.9%	18.8%
050101	6035	3861	1308	21.7%	1	0.0%	262	4.3%	0	0.0%	40	0.7%	170	2.8%	440	7.3%	36.0%
050102	6066	2843	2567	42.3%	6	0.1%	232	3.8%	0	0.0%	153	2.5%	136	2.2%	282	4.6%	53.1%

060101	3841	2920	445	11.6%	8	0.2%	257	6.7%	0	0.0%	0	0.0%	90	2.3%	121	3.2%	24.0%
060102	3205	2286	419	13.1%	6	0.2%	85	2.7%	0	0.0%	53	1.7%	62	1.9%	340	10.6%	28.7%
060200	5868	4561	813	13.9%	14	0.2%	56	1.0%	0	0.0%	0	0.0%	104	1.8%	320	5.5%	22.3%
070100	4573	4236	0	0.0%	39	0.9%	48	1.0%	0	0.0%	24	0.5%	101	2.2%	131	2.9%	7.4%
070200	4924	4541	124	2.5%	0	0.0%	117	2.4%	0	0.0%	0	0.0%	85	1.7%	57	1.2%	7.8%
070300	4625	3752	76	1.6%	0	0.0%	498	10.8%	0	0.0%	72	1.6%	104	2.2%	150	3.2%	18.9%
080100	2563	2263	78	3.0%	25	1.0%	93	3.6%	0	0.0%	11	0.4%	76	3.0%	17	0.7%	11.7%
080200	3583	3220	87	2.4%	4	0.1%	80	2.2%	0	0.0%	39	1.1%	68	1.9%	121	3.4%	10.1%
080300	3841	3348	96	2.5%	5	0.1%	155	4.0%	0	0.0%	0	0.0%	92	2.4%	145	3.8%	12.8%
080400	3297	2705	96	2.9%	38	1.2%	265	8.0%	0	0.0%	20	0.6%	71	2.2%	122	3.7%	18.0%
090100	4598	4010	436	9.5%	0	0.0%	53	1.2%	0	0.0%	12	0.3%	1	0.0%	107	2.3%	12.8%
090200	1940	1583	155	8.0%	0	0.0%	103	5.3%	0	0.0%	0	0.0%	64	3.3%	35	1.8%	28.4%
090300	3292	2331	217	6.6%	26	0.8%	303	9.2%	0	0.0%	29	0.9%	210	6.4%	224	6.8%	29.2%
090600	4786	4223	89	1.9%	0	0.0%	208	4.3%	0	0.0%	14	0.3%	108	2.3%	158	3.3%	11.8%
090700	3198	3080	0	0.0%	0	0.0%	23	0.7%	0	0.0%	11	0.3%	20	0.6%	75	2.3%	3.7%
090800	2408	2339	30	1.2%	0	0.0%	26	1.1%	0	0.0%	0	0.0%	0	0.0%	13	0.5%	2.9%
090900	3895	3352	263	6.8%	0	0.0%	95	2.4%	0	0.0%	0	0.0%	139	3.6%	46	1.2%	13.9%
091000	4636	3809	324	7.0%	8	0.2%	61	1.3%	0	0.0%	92	2.0%	183	3.9%	251	5.4%	17.8%
091100	4267	3911	159	3.7%	0	0.0%	65	1.5%	0	0.0%	0	0.0%	48	1.1%	84	2.0%	8.3%
091200	4713	3914	200	4.2%	7	0.1%	315	6.7%	0	0.0%	23	0.5%	90	1.9%	187	4.0%	17.0%
091300	3493	3283	50	1.4%	0	0.0%	69	2.0%	0	0.0%	47	1.3%	0	0.0%	44	1.3%	6.0%
091400	2306	1917	95	4.1%	21	0.9%	33	1.4%	0	0.0%	0	0.0%	99	4.3%	141	6.1%	16.9%
100100	3775	2835	559	14.8%	14	0.4%	34	0.9%	0	0.0%	89	2.4%	53	1.4%	273	7.2%	24.9%
100200	3863	2769	182	4.7%	31	0.8%	76	2.0%	0	0.0%	176	4.6%	69	1.8%	760	19.7%	28.3%
100300	2908	2425	26	0.9%	33	1.1%	92	3.2%	11	0.4%	101	3.5%	75	2.6%	255	8.8%	16.6%
100400	2637	2111	126	4.8%	30	1.1%	0	0.0%	0	0.0%	36	1.4%	44	1.7%	326	12.4%	19.9%
100500	3769	2890	277	7.3%	5	0.1%	150	4.0%	0	0.0%	97	2.6%	19	0.5%	428	11.4%	23.3%
100600	2295	1849	87	3.8%	1	0.0%	15	0.7%	0	0.0%	0	0.0%	90	3.9%	253	11.0%	19.4%
100700	2707	2338	105	3.9%	0	0.0%	50	1.8%	0	0.0%	0	0.0%	26	1.0%	188	6.9%	13.6%
100800	2916	2547	10	0.3%	0	0.0%	106	3.6%	0	0.0%	41	1.4%	88	3.0%	165	5.7%	12.7%
100900	3744	2835	167	4.5%	13	0.3%	378	10.1%	0	0.0%	9	0.2%	44	1.2%	329	8.8%	24.3%
101000	4790	4190	32	0.7%	5	0.1%	66	1.4%	0	0.0%	13	0.3%	35	0.7%	462	9.6%	12.5%
101100	1836	1515	85	4.6%	0	0.0%	60	3.3%	0	0.0%	4	0.2%	9	0.5%	167	9.1%	17.5%
101200	3121	2891	35	1.1%	0	0.0%	27	0.9%	0	0.0%	23	0.7%	27	0.9%	141	4.5%	7.4%
101300	3013	2592	68	2.3%	6	0.2%	83	2.8%	0	0.0%	0	0.0%	24	0.8%	240	8.0%	14.0%
101400	3635	2794	127	3.5%	58	1.6%	75	2.1%	0	0.0%	64	1.8%	35	1.0%	546	15.0%	23.1%
101500	4984	3677	197	4.0%	0	0.0%	101	2.0%	0	0.0%	0	0.0%	80	1.6%	929	18.6%	26.2%
101600	4800	3474	216	4.5%	15	0.3%	220	4.6%	0	0.0%	108	2.3%	135	2.8%	762	15.9%	27.6%
101700	3277	2618	184	5.6%	12	0.4%	0	0.0%	0	0.0%	61	1.9%	84	2.6%	439	13.4%	20.1%
101800	2607	2243	114	4.4%	140	5.4%	12	0.5%	0	0.0%	12	0.5%	7	0.3%	79	3.0%	14.0%
110100	4222	2071	542	12.8%	25	0.6%	166	3.9%	0	0.0%	314	7.4%	71	1.7%	1347	31.9%	50.9%
120101	3986	3460	74	1.9%	91	2.3%	134	3.4%	0	0.0%	45	1.1%	23	0.6%	159	4.0%	13.2%
120102	3840	3504	39	1.0%	0	0.0%	100	2.6%	0	0.0%	0	0.0%	35	0.9%	162	4.2%	8.8%
120201	3494	3057	29	0.8%	10	0.3%	288	8.2%	0	0.0%	0	0.0%	36	1.0%	74	2.1%	12.5%
120202	3223	2384	147	4.6%	12	0.4%	82	2.5%	0	0.0%	97	3.0%	21	0.7%	577	17.9%	26.0%
120203	3473	2782	167	4.8%	32	0.9%	98	2.8%	0	0.0%	56	1.6%	23	0.7%	434	12.5%	19.9%
120300	2082	1456	92	4.4%	0	0.0%	61	2.9%	0	0.0%	36	1.7%	55	2.6%	418	20.1%	30.1%
120400	6901	5326	370	5.4%	52	0.8%	61	0.9%	0	0.0%	162	2.3%	154	2.2%	947	13.7%	22.8%
120501	4493	3249	130	2.9%	0	0.0%	577	12.8%	0	0.0%	8	0.2%	25	0.6%	512	11.4%	27.7%
120502	5304	4043	154	2.9%	0	0.0%	687	13.0%	0	0.0%	0	0.0%	60	1.1%	360	6.8%	23.8%
130100	4922	4354	0	0.0%	0	0.0%	192	3.9%	0	0.0%	15	0.3%	84	1.7%	277	5.6%	11.5%
130200	2834	2642	24	0.8%	0	0.0%	16	0.6%	0	0.0%	11	0.4%	53	1.9%	109	3.8%	6.8%
140100	3029	2837	14	0.5%	0	0.0%	119	3.9%	0	0.0%	0	0.0%	0	0.0%	59	1.9%	6.3%
140201	5130	4398	0	0.0%	15	0.3%	160	3.1%	0	0.0%	36	0.7%	209	4.1%	348	6.8%	14.3%
140202	6135	5664	120	2.0%	57	0.9%	158	2.6%	0	0.0%	63	1.0%	60	1.0%	103	1.7%	7.7%
150100	8999	7309	120	1.3%	48	0.5%	962	10.7%	0	0.0%	25	0.3%	59	0.7%	501	5.6%	18.8%
150301	6211	5518	17	0.3%	0	0.0%	344	5.5%	0	0.0%	21	0.3%	192	3.1%	140	2.3%	11.2%
150303	4862	4333	56	1.2%	13	0.3%	321	6.6%	0	0.0%	13	0.3%	0	0.0%	139	2.9%	10.9%
150304	3998	3428	174	4.4%	6	0.2%	188	4.7%	0	0.0%	15	0.4%	114	2.9%	73	1.8%	14.3%
160100	6609	5631	125	1.9%	11	0.2%	337	5.1%	0	0.0%	8	0.1%	55	0.8%	450	6.8%	14.8%
160202	7363	6025	104	1.4%	121	1.6%	380	5.2%	0	0.0%	234	3.2%	25	0.3%	708	9.6%	18.2%
160203	5970	4551	237	4.0%	0	0.0%	635	10.6%	0	0.0%	67	1.1%	63	1.1%	484	8.1%	23.8%
160204	5141	3637	202	3.9%	14	0.3%	808	15.7%	0	0.0%	7	0.1%	113	2.2%	367	7.1%	29.3%
160300	9891	8257	172	1.7%	123	1.2%	550	5.6%	0	0.0%	109	1.1%	112	1.1%	677	6.8%	16.5%
170100	2680	2367	20	0.7%	15	0.6%	0	0.0%	0	0.0%	16	0.6%	112	4.2%	166	6.2%	11.7%
170200	3821	3265	58	1.5%	0	0.0%	114	3.0%	0	0.0%	23	0.6%	44	1.2%	340	8.9%	14.6%
170300	2669	2426	37	1.4%	14	0.5%	0	0.0%	0	0.0%	15	0.6%	82	3.1%	121	4.5%	9.1%
170400	3219	2929	73	2.3%	0	0.0%	29	0.9%	0	0.0%	9	0.3%	87	2.7%	101	3.1%	9.0%

170500	2338	2048	78	3.3%	15	0.6%	12	0.5%	0	0.0%	16	0.7%	23	1.0%	162	6.9%	12.4%
170600	3634	2718	39	1.1%	27	0.7%	8	0.2%	0	0.0%	23	0.6%	268	7.4%	574	15.8%	25.2%
170700	2868	2238	101	3.5%	10	0.3%	15	0.5%	0	0.0%	55	1.9%	36	1.3%	468	16.3%	22.0%
180100	3020	2748	21	0.7%	0	0.0%	0	0.0%	0	0.0%	50	1.7%	0	0.0%	251	8.3%	9.0%
180200	4805	3458	63	1.3%	139	2.9%	93	1.9%	0	0.0%	482	10.0%	43	0.9%	1009	21.0%	28.0%
180300	3279	2303	232	7.1%	21	0.6%	10	0.3%	0	0.0%	108	3.3%	90	2.7%	635	19.4%	29.8%
180400	2746	2267	110	4.0%	14	0.5%	68	2.5%	0	0.0%	26	0.9%	43	1.6%	244	8.9%	17.4%
180500	4497	3951	115	2.6%	36	0.8%	39	0.9%	0	0.0%	0	0.0%	130	2.9%	271	6.0%	12.1%
185100	4543	3393	162	3.6%	108	2.4%	122	2.7%	10	0.2%	24	0.5%	128	2.8%	620	13.6%	25.3%
185200	5006	4014	48	1.0%	94	1.9%	157	3.1%	0	0.0%	57	1.1%	111	2.2%	582	11.6%	19.8%
185300	3594	3315	83	2.3%	0	0.0%	129	3.6%	0	0.0%	0	0.0%	54	1.5%	22	0.6%	7.8%
185400	1773	19	1461	82.4%	10	0.6%	0	0.0%	0	0.0%	25	1.4%	258	14.6%	5	0.3%	98.9%
185500	1789	4	1764	98.6%	0	0.0%	5	0.3%	0	0.0%	0	0.0%	5	0.3%	11	0.6%	99.8%
185600	1700	442	1213	71.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	45	2.6%	0	0.0%	74.0%
185700	2307	69	2062	89.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	134	5.8%	48	2.1%	97.0%
185800	1552	16	1345	86.7%	57	3.7%	38	2.4%	0	0.0%	0	0.0%	32	2.1%	64	4.1%	99.0%
185900	1208	94	880	72.8%	0	0.0%	223	18.5%	0	0.0%	0	0.0%	11	0.9%	0	0.0%	92.2%
186000	1551	136	1345	86.7%	3	0.2%	5	0.3%	0	0.0%	0	0.0%	58	3.7%	4	0.3%	91.2%
186100	2100	126	1610	76.7%	87	4.1%	207	9.9%	0	0.0%	7	0.3%	47	2.2%	89	4.2%	94.0%
186200	1452	77	1185	81.6%	4	0.3%	47	3.2%	0	0.0%	31	2.1%	15	1.0%	127	8.7%	94.7%
186300	3174	1433	1426	44.9%	21	0.7%	49	1.5%	0	0.0%	20	0.6%	88	2.8%	180	5.7%	54.9%
186400	1404	997	116	8.3%	7	0.5%	116	8.3%	9	0.6%	48	3.4%	49	3.5%	118	8.4%	29.0%
186500	1699	617	180	10.6%	0	0.0%	77	4.5%	0	0.0%	524	30.8%	16	0.9%	816	48.0%	63.7%
186600	2188	614	207	9.5%	5	0.2%	96	4.4%	0	0.0%	215	9.8%	15	0.7%	1264	57.8%	71.9%
186800	1361	294	473	34.8%	0	0.0%	39	2.9%	0	0.0%	260	19.1%	29	2.1%	526	38.6%	78.4%
186900	2409	1798	199	8.3%	0	0.0%	192	8.0%	0	0.0%	12	0.5%	89	3.7%	119	4.9%	25.4%
187000	3619	2953	181	5.0%	12	0.3%	128	3.5%	0	0.0%	133	3.7%	132	3.6%	195	5.4%	18.4%
187200	5431	3342	1405	25.9%	39	0.7%	146	2.7%	0	0.0%	49	0.9%	136	2.5%	370	6.8%	38.5%
187300	6602	5598	23	0.3%	0	0.0%	570	8.6%	0	0.0%	121	1.8%	204	3.1%	207	3.1%	15.2%
187400	2921	2560	112	3.8%	8	0.3%	45	1.5%	0	0.0%	11	0.4%	29	1.0%	167	5.7%	12.4%
980000	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	#DIV/0!
990000	0	0	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	0	#DIV/0!	#DIV/0!

Note: Highlighted cells have a total minority rate greater than the county average of 46%

Data Source: 2015 ACS 5-year estimates

Milwaukee County Low-Income Distribution Chart

Census Tract	Total Population	Low-Income Population	Percent Poverty
1.01	4886	1790	38.3%
1.02	3726	1039	28.6%
2.01	5228	2111	40.4%
2.02	6238	1249	20.1%
3.01	1503	41	2.7%
3.02	3200	1004	31.4%
3.03	1841	239	13.1%
3.04	3174	215	6.8%
4	2472	417	16.9%
5.01	3718	835	22.5%
5.02	4835	1585	34.8%
6	6630	1792	27.8%
7	3456	522	15.9%
8	4808	719	15.2%
9	3915	1240	31.7%
10	3616	1012	28.5%
11	2217	577	26.1%
12	3231	1283	40.0%
13	4382	924	21.2%
14	2330	777	33.6%
15	3246	1018	31.4%
16	2940	1010	34.7%
17	4884	1267	26.0%
18	3021	1124	37.2%
19	2885	1059	36.7%
20	2431	742	30.6%
21	2107	823	39.4%
22	1633	333	20.4%
23	4055	1219	30.1%
24	2047	844	41.2%
25	2102	920	43.9%
26	2942	872	29.9%
27	2120	676	31.9%
28	2340	769	32.9%
29	2191	843	38.5%
30	4136	1227	29.7%
31	3897	445	11.4%
32	2949	495	16.8%
33	5000	1212	24.4%
34	5841	1468	25.4%
35	4149	520	12.6%
36	2310	764	33.2%
37	1994	544	27.4%
38	2521	696	27.6%
39	2775	625	22.7%
40	2644	874	33.5%
41	2415	786	32.5%
42	3273	1669	51.5%
43	4404	1234	28.0%
44	3443	1216	35.3%
45	2246	1093	48.8%
46	3091	1121	36.5%
47	3928	1114	28.4%
48	4012	1657	41.4%
49	4246	739	17.4%
50	5198	1198	23.0%

51	3723	905	24.5%
52	1671	171	10.2%
53	1994	201	10.1%
54	3972	391	10.1%
55	3218	64	2.0%
56	2216	84	4.0%
57	2358	186	7.9%
58	3309	445	13.6%
59	3458	627	18.1%
60	2699	1175	44.1%
61	2207	626	28.4%
62	2390	843	35.4%
63	2390	1011	42.6%
64	2421	1519	64.0%
65	2094	1135	54.4%
66	2947	1669	56.6%
67	1275	591	46.4%
68	2608	1019	41.7%
69	3155	2101	66.7%
70	2690	1150	43.2%
71	2069	636	30.8%
72	3023	567	18.8%
73	2657	1067	40.7%
74	3676	423	28.6%
75	2528	621	24.6%
76	3536	783	23.4%
77	3835	1237	32.4%
78	3650	1765	48.4%
79	2245	328	17.9%
80	1957	751	38.5%
81	1290	659	51.1%
84	1338	629	47.0%
85	1491	994	67.7%
86	1032	349	33.9%
87	1503	667	44.4%
88	1977	938	47.7%
89	1233	592	53.0%
90	2546	1457	57.7%
91	2179	876	40.3%
92	1924	588	31.8%
93	2461	426	17.5%
94	2820	92	3.3%
95	2135	197	9.2%
96	2212	1192	54.4%
97	1745	500	28.7%
98	1479	825	55.8%
99	1179	284	24.2%
106	1099	356	32.5%
107	2362	519	22.2%
108	2486	411	18.6%
110	3264	618	18.9%
111	1625	347	21.7%
112	2269	517	22.8%
113	1749	293	21.4%
114	1378	122	8.9%
122	2643	1428	54.0%
123	998	358	35.9%
124	2640	529	20.0%
125	2170	96	4.4%
126	2439	329	13.6%

127	1307	126	10.6%
128	3194	329	13.4%
129	3059	578	19.1%
130	1940	402	20.7%
133	1092	305	28.6%
134	2357	1165	49.4%
135	1986	1023	54.2%
136	2556	1203	49.2%
137	1646	844	51.3%
141	1596	847	53.1%
143	2479	340	13.7%
144	2784	287	12.2%
146	3954	1234	68.7%
147	3387	2052	81.6%
148	2001	740	47.1%
149	1541	1061	68.9%
157	2979	1530	51.5%
158	2890	1215	42.3%
159	3869	1696	43.8%
160	3306	1656	50.1%
161	3607	905	25.1%
162	3082	1158	37.7%
163	4929	1991	40.7%
164	4231	1896	45.5%
165	2258	888	39.5%
166	2034	1113	55.5%
167	3257	1282	39.4%
168	3339	1521	45.8%
169	3916	1688	43.5%
170	5744	1936	34.4%
171	2949	684	23.2%
172	2570	585	22.8%
173	4073	1510	37.1%
174	3091	1436	47.2%
175	4027	1734	43.1%
176	3048	1330	43.6%
179	3077	544	17.8%
180	2952	558	18.9%
181	1703	143	8.4%
182	1741	52	3.0%
183	2526	444	18.1%
184	1391	101	7.3%
185	1903	193	10.1%
186	2946	996	34.6%
187	3553	1363	38.4%
188	2313	919	39.8%
189	1965	427	21.8%
190	4867	914	18.9%
191	3701	481	14.1%
192	3220	374	11.6%
193	2623	87	3.3%
194	3925	578	14.7%
195	3559	345	9.7%
196	3565	313	8.9%
197	5626	878	15.6%
198	5249	970	18.5%
199	3922	477	12.2%
200	3508	934	27.0%
201	3644	548	15.4%
202	3125	699	22.4%

203	4061	550	13.5%
204	3525	776	22.0%
205	3259	782	24.0%
206	3580	323	9.1%
207	4172	412	9.9%
208	3054	196	6.4%
209	2641	273	10.6%
210	2347	255	11.0%
211	1372	89	6.5%
212	2237	494	22.1%
213	1697	300	17.7%
214	3639	1268	35.2%
215	2900	399	13.9%
216	4580	988	21.6%
217	6961	910	13.3%
218	2442	452	19.1%
301	4449	121	2.7%
351	2295	75	3.3%
352	4414	126	3.0%
401	1472	23	1.6%
501.01	6035	276	4.6%
501.02	6066	737	12.1%
601.01	3841	421	11.2%
601.02	3205	82	2.6%
602	5868	701	12.6%
701	4573	168	3.7%
702	4924	280	5.7%
703	4625	152	3.3%
801	2563	134	5.2%
802	3583	253	7.1%
803	3841	212	5.5%
804	3297	753	22.8%
901	4598	390	8.9%
902	1940	81	4.2%
903	3292	177	5.4%
906	4786	446	9.4%
907	3198	61	1.9%
908	2408	72	3.0%
909	3895	160	4.3%
910	4636	240	5.2%
911	4267	113	2.7%
912	4713	584	12.5%
913	3493	338	9.7%
914	2306	70	3.0%
1001	3775	955	25.4%
1002	3863	549	14.2%
1003	2908	502	17.3%
1004	2637	400	15.3%
1005	3769	733	20.0%
1006	2295	428	18.7%
1007	2707	234	8.7%
1008	2916	162	5.6%
1009	3744	567	15.1%
1010	4790	537	11.2%
1011	1836	189	10.3%
1012	3121	192	6.7%
1013	3013	231	7.7%
1014	3635	359	10.0%
1015	4984	1178	23.8%
1016	4800	530	11.3%

1017	3277	494	15.1%
1018	2607	347	13.6%
1101	4222	1020	24.2%
1201.01	3986	243	6.2%
1201.02	3840	320	8.7%
1202.01	3494	267	7.6%
1202.02	3223	361	11.2%
1202.03	3473	366	10.5%
1203	2082	280	13.7%
1204	6901	576	8.8%
1205.01	4493	468	10.5%
1205.02	5304	666	12.9%
1301	4922	289	5.9%
1302	2834	167	5.9%
1401	3029	141	4.7%
1402.01	5130	308	6.0%
1402.02	6135	635	10.6%
1501	8999	722	8.1%
1503.01	6211	229	3.7%
1503.03	4862	195	4.0%
1503.04	3998	544	13.7%
1601	6609	829	12.6%
1602.02	7363	530	7.2%
1602.03	5970	388	6.5%
1602.04	5141	323	6.4%
1603	9891	311	3.1%
1701	2680	336	12.6%
1702	3821	371	9.8%
1703	2669	290	10.9%
1704	3219	201	6.2%
1705	2338	317	14.9%
1706	3634	937	25.8%
1707	2868	256	8.9%
1801	3020	407	13.5%
1802	4805	1500	31.2%
1803	3279	576	17.6%
1804	2746	228	8.4%
1805	4497	258	5.8%
1851	4543	739	16.4%
1852	5006	379	7.8%
1853	3594	263	7.5%
1854	1773	832	47.1%
1855	1789	830	46.4%
1856	1700	507	29.8%
1857	2307	1371	60.0%
1858	1552	483	31.5%
1859	1208	441	36.5%
1860	1551	660	43.4%
1861	2100	1185	57.6%
1862	1452	763	55.4%
1863	3174	288	19.5%
1864	1404	223	52.6%
1865	1699	583	34.3%
1866	2188	926	42.3%
1868	1361	824	63.2%
1869	2409	98	4.5%
1870	3619	561	16.1%
1872	5431	102	3.0%
1873	6602	270	4.1%
1874	2921	147	5.3%

9800	0	0	0.0%
9900	0	0	0.0%
Data Source: 2015 ACS 5-year estimates			
Highlighted rows are tracts with more than 21.6% Poverty			