INTER-OFFICE COMMUNICATION

DATE: July 2, 2019

TO: Theo Lipscomb, Sr., Chairman, Milwaukee County Board of Supervisors

CC: Marcelia Nicholson, Vice Chairwoman; Board of Supervisors and Chair of Transportation, Public Works & Transit Committee

FROM: Nicole M. Brookshire, Executive Director, Office on African American Affairs

SUBJECT: File No. 19-27 - MCTS NEXT Redesign

INTRODUCTORY COMMENTS

The Office on African American Affairs (OAAA) is committed to improving Milwaukee County policies and practices through the lens of racial equity. We also recognize that government has the potential to leverage significant change and set the stage for achieving racial equity across our community – which begins with our local County government.

Milwaukee County File #19-27, was referred to the Office on African American Affairs to analyze the report from a racial equity lens and Title VI requirement. To recap, File #19-27, is an informational update by Milwaukee County Transit System, for MCTS NEXT Redesign.

At the start of 2019, Milwaukee County embarked on the process of *normalizing* conversations around Racial Equity by offering training to all levels of leadership (Department heads and Elected Offices). OAAA's effort to begin the normalization process this year and most recently with managerial training this month, confirms the office's effort to familiarize all staff with racial equity terminology and the impacts of inequities. It is also important to note that all countywide training for Milwaukee County staff will not begin until July 2019. While OAAA's intent is to offer all staff with racial equity training, the use of racial equity tools, to best determine equitable decisions and operational practices are not introduced nor effective, until all training has been offered and attended. In addition, once normalization has occurred, the development and then use of racial equity tools is considered phase II and will require more time.

To honor the Milwaukee County Board's request to review File#19-27, this response is the office's best faith effort, to assess equity.

OAAA is using a national racial equity framework to drive racial equity in Milwaukee County. This framework is composed of a three-prong approach: *normalize* (use a racial equity framework to implement racial equity training), *organize* (build organizational capacity through learning how to use a racial equity tool), and *operationalize* (implementation of the consistent use of a racial equity tool while

remaining data-driven). Prior to the development of a racial equity tool, OAAA has outlined assumptions for this file, and suggestive optional recommendations for Milwaukee County Transit System. Furthermore, the following recommendations are intended to inspire further exploration of equitable practices with Milwaukee County decision-makers.

DEFINITION OF A RACIAL EQUITY TOOL

Racial equity tools are designed to integrate explicit consideration of racial equity in decisions, including policies, practices, programs, and budgets. It is both a product and a process. The use of a racial equity tool can help to develop strategies and actions that reduce racial inequities and improve success for all Milwaukee County residents.

Too often, policies and programs are developed and implemented without thoughtful consideration of racial equity. When racial equity is not explicitly brought into operations and decision-making, racial inequities are likely to be perpetuated. Racial equity tools provide a structure for institutionalizing the consideration of racial equity.

A racial equity tool:
- proactively seeks to eliminate racial inequities and advance equity;
- identifies clear goals, objectives and measurable outcomes;
- engages community in decision-making processes;
- identifies who will benefit or be burdened by a given decision, examines potential unintended consequences of a decision, and develops strategies to advance racial equity and mitigate unintended negative consequences; and,
- develops mechanisms for successful implementation and evaluation of impact.

Use of a racial equity tool is an important step to operationalizing equity. However, it is not enough by itself. We must have a much broader vision of the transformation of government to advance racial equity. To transform government, we must *normalize* conversations about race, *organize* to build organizational capacity, and *operationalize* new behaviors and policies to achieve racial equity.

OAAA ASSUMPTIONS

- All Office on African American Affairs staff have not received all applicable racial equity training, and currently is not fully equipped to complete a comprehensive racial equity assessment.
- Fiscal years 2019/2020 the Milwaukee County workforce will begin its process to normalize the conversation surrounding Racial Equity, referencing the Government Alliance on Race and Equity (GARE) logic model.
  a. Racial Equity & Milwaukee County – Leaders Training (November 2018 – April 2019)
  b. Racial Equity Managerial Training (June 2019 – August 2019)
  c. Racial Equity All County Training (July 2019 – January 2020)
- State of Wisconsin's budget appropriations, those issued to Milwaukee County continues to decline, relative in size, over the past two decades. This limited revenue continues to disparately impact Milwaukee County, causing undue burden to public services; those which our community residents depend on, daily.
- Midwest Region is one of the last regions to incorporate rapid transit.

- In the past year, MCTS's outreach efforts have tabulated in excess, of 4,000 forms of communication across Milwaukee County.
- MCTS will need to await adopted FY2020 budget, before seeking a final decision on the project's 'recommended system map' (route/services). MCTS NEXT Redesign is contingent on having sufficient transportation fiscal resources before the project can move forward into the construction phase.
- MCTS will continue to assess/review disparate impacts to minority/low-income populations with any proposed changes to the MCTS NEXT system/service lines. In addition, MCTS will continue to extend community outreach efforts, to inform riders and community about route changes.
- MCTS will continue to document and evaluate impacts to ridership due to service line changes. Tracking and addressing public comments about the change, accordingly.
- Declining trends in ridership, is an indicator of socio-economic changes in the community. Nationwide declining ridership is being experienced by metro transit agencies; often due to residents using alternative transportation options.
- Individual rider racial demographic data is not currently being captured by MCTS. Population-level data (2010 Census data) was used by MCTS, as the demographic data source for conducting a disparate impact or disproportionate burden analysis.
- Title VI regulation was designed to limit further harm to people of color when service line or route changes are needed. This regulation solely, does not advance equity, as each government jurisdiction have systemic inequities perpetuated by decades of inequitable planning and policy making.
- Transit equity research continues to focus on federal policy; often not incorporating the need for state and local transportation funding and governance reform.

EQUITY RECOMMENDATIONS

Below are the Office on African American Affairs recommendations for file number 19-27:
1. Align Milwaukee County's Fair Deal workgroup's recommendation for adjusting State Shared Revenue payments on other, non-mandated services, like public transit. Specifically, to address the 'urgency' in receiving an increase in revenue to address transportation funding gaps. In addition, seeking the workgroup's support in re-defining state legislation grant criteria so funding is eligible for MCTS operating costs, or to enhance lobbying efforts with State legislature, to advocate for re-defining eligible grant criteria (to allow operating costs as an eligible expense).
2. Continue to expand MCTS's outreach efforts and seek ways to enhance awareness to key stakeholders; identify ways to include resident and rider feedback on the front-end of decision-making. Achieving equity requires shared decision-making that is rooted in transparency and a commitment to changing inequitable policies and practices. Bringing the community into all stages of infrastructure planning and implementation allows for community knowledge and priorities to shape decisions and ultimately leads to better projects and outcomes.
3. Utilize MCTS staff and/or stakeholder partners to survey riders while they ride on the bus. Surveying riders in this fashion, could provide a greater cross-section of stakeholder feedback. Enhancing feedback, specifically by conducting on-bus surveys with riders, helps ensure impacted riders have shared their thoughts.
4. MCTS should identify ways to compare ridership demographic data with demographic data collected from those who have historically attended hosted sessions. Comparison of data will ensure that all segments of the population are fully included in the decision-making process.

This can include, but is not limited to: zip code data, race/ethnicity, socio-economic status, gender, ADA eligibility, individuals with access to other modes of transportation, etc.

5. Work closely with Transit Services Advisory Committee (TSAC). Consider expanding TSAC committee by-laws to expand community resident representation (as an appointed committee member). Offer TSAC member racial equity training, to help equip the committee in reviewing/making racial equity decisions. Align TSAC to MCTS outreach efforts.

ADDITIONAL TRANSIT MODEL FOR CONSIDERATION

1. **Central Oklahoma Transportation and Parking Authority- Final Report May 2019** (https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/civil-rights-ada/132486/cotpa-final-ada-paratransit-report-2019.pd)

"COTPA has developed robust data collection, tracking, and reporting to identify constraints and improve service performance. COTPA will soon launch a new, accessible downtown streetcar system and expand its bus and ADA paratransit service from six to seven days a week."

2. **Metropolitan Council-Transportation Public Participation Plan (**https://metrocouncil.org/About-Us/Publications-And-Resources/Transportation-Public-Participation-Plan.aspx**)**

This Transportation Public Participation Plan establishes a framework for the region's stakeholders to influence both long-term transportation policy development and short-term transportation programming. It details the methods and strategies that will be used to engage the wide range of stakeholders, from policymakers, to business interests, to residents of the region. It also identifies specific ways those stakeholders can connect to the decision-making process.

ADDITIONAL INFORMATION

1. Aligning with GARE's Logic Model, best practice indicates that a Racial Equity Plan should be written after Racial Equity has been normalized and organized within our jurisdiction. Moreover, the creation of a racial equity toolkit should proceed the amendment of practices and procedures.
2. The Racial Equity Plan will shape key definitions with the support of the RE Ambassador cohort, to ensure continuity.

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