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### **Opposition to Elimination of Bus Stops**

We oppose the elimination of bus stops throughout the older and more densely settled areas of Madison as proposed in the Transit Development Plan (TDP) 2013-17 and in the process of being implemented by Madison Metro.

### **Impact of Federal Mass Transit Regulations for “Elderly and Handicapped Persons” on Madison’s Bus Stop Spacing Plan**

The federal Americans with Disabilities Act (ADA) and federal transportation regulations require mass transit entities to implement policies and practices such that "the availability to elderly and handicapped persons of mass transportation which they can effectively utilize will be assured...." Public Law 91-453, Publ.Law. 93-643, see 23 USC §142, *note*. However, Madison Metro is in the process of implementing practices and policies that will effectively prevent or impede elderly and people with disabilities in the older, more densely settled areas of Madison from “effectively utilizing” mass transportation, by increasing bus stop spacing that makes it disproportionately more difficult for them to catch a bus.

Contrary to federal regulations, Metro is targeting bus stops for elimination that service organizations for people with disabilities. For example, Metro plans for eliminate stops at Livingston St. serving the Wisconsin Council of the Blind, at Brearly St. serving the WilMar Neighborhood Center, and at Few St. serving the Social Justice Center. Clearly, these stops were scheduled for elimination without regard for the elders and people with disabilities using these organizations. Better planning is required to assure that elderly and people with disabilities can “effectively utilize” Madison’s transit service.

In fact, Metro staff has actively advocated that elderly and disabled people should use Madison’s paratransit service instead of mass transit when they are not able to walk the additional distance to the stop (“Riders Angered by Proposed Bus Stop Closings,” *Isthmus*, January 15, 2015). In the *Isthmus* article, Metro director Chuck Kamp states: “people with mobility problems who might have a tough time walking an extra block can arrange rides through Metro’s paratransit service.” However, even though Metro runs the separate and more expensive paratransit service, it is not considered “mass transit” under the federal definition of transit. The TDP and Metro may not, under federal regulations, steer elderly and disabled people away from mass transit and toward paratransit service as an alternative, a clear violation of well-established federal laws.

Madison Metro needs to find other ways of achieving its goals of bringing more and speedier transit service to Madison’s periphery, increasing service reliability, and ensuring that the 20% of riders who make connections are reliably able to do so, than by disproportionately impacting elders and people with disabilities.

## **Bus Stop Spacing Standards**

In setting its bus stop spacing and elimination plans, Madison Metro appears to be out of step with other major transit providers nationwide. A recent survey by the Maryland Transit Authority (MTA), (Attachment 2), shows that while mass transit providers nationwide have not adopted a uniform standard for bus stop spacing, they typically space stops closer together in older, more densely populated areas, and adopt more distant spacing in peripheral areas. Indeed, the MTA proposes just such a standard (Attachment 3) based on land use patterns, while requiring simultaneous adoption of policies to “assure” mass transit service is maintained for elders and people with disabilities. Most transit entities surveyed by MTA use population density and demand driven by employment and activity centers (such as shopping malls and schools) as the key land use patterns and features around which bus stops are organized.

In contrast, Madison TDP (p29) states that the “higher speed roadways in central Madison have a longer average stop spacing (0.14 to 0.18 miles) than do lower-speed roadways (0.10 to 0.12 miles)” and “peripheral corridors, which are mostly higher speed roadways, generally have longer average stop spacing (0.14 to 0.20 miles) than central corridors.” Thus, while mixed, it appears that Madison Metro primarily focuses on roadway speed as the basis for bus stop spacing, rather than on land use patterns. TDP Tables 16, 17 and 18 make it clear that Metro plans to maximize service on “higher speed” roadways and eliminate and reduce service on “lower speed” roadways.

Madison Metro’s focus on roadway speed as the basis for spacing bus stops, while appearing to be an easy way to bring speedier transit service to Madison’s periphery, is out of step with the rest of the nation, and fails to account for land use planning patterns in place throughout Madison. Data in the TDP, Figure 42, shows a clear relationship between population density and transit utilization in Madison: “ridership is heaviest along University Avenue and the Isthmus” (TDP, p 3-31); and “high (utilization) concentrations in peripheral locations can be seen at the major shopping malls, Madison (Area Technical) College and at Madison high schools.” Although Madison Metro’s own data shows population density, employment, and activity centers drives bus utilization, we question why Madison Metro places disproportionate importance on roadway speed rather than land use patterns in determining bus stop spacing and elimination plans.

## **Recommendations**

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1. We recommend that Madison Metro better meet the letter and intent of federal ADA and transportation regulations by assuring that “the availability to elderly and handicapped persons of mass transportation which they can effectively utilize will be assured.”
  2. We also recommend and urge adoption of the Maryland Transit Authority’s (MTAs) standards for bus stop spacing shown in Attachments 3 and 4, below, which are based on an in-depth survey and analysis of major transit operations nationwide, which Madison Metro did not conduct.
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3. We also recommend that Madison Metro formally adopt MTAs “Exceptions to Spacing Guidelines,” *“Bus Stop Optimization Policy Pilot ,”* p. 9, including: “stop spacing closer than the recommended minimum spacing is acceptable” when “closer spacing is necessary to properly serve identified populations with mobility issues (i.e., seniors and persons with disabilities)”;  
and that “Title VI and environmental justice populations are not disproportionately impacted by the removal of stops” (MTAs *“Bus Stop Optimization Policy Pilot”* p 10) and that “for all changes, ensure that...the community has been properly consulted about the proposed change in stop locations.”

**Attachment 1**

**Planning for bus stops must consider the needs of people with disabilities and elders.** Federal law, since 1970, has established the clear policy for transportation systems receiving federal funds to make special efforts in the planning and design of mass transportation facilities and services "so that the availability to elderly and handicapped persons of mass transportation which they can effectively utilize will be assured...." Publ.law. 91-453, Publ.law. 93-643, see 23 USC §142, note. This policy has subsequently been reaffirmed and incorporated into other provisions of law, including Sec. 504 of the Rehabilitation Act of 1973, as amended.

**Attachment 2**

[Maryland Transit Authority Pilot study](#), p. 4. Nationwide Survey of Transit Providers

**Typical Stop Spacing by Land Use**

Stop Type	MTA Local Bus Service Standards	MD Transit Guidelines	SEPTA	TriMet	SFMTA	MBTA <sup>5</sup>	HRT
Downtown	500 – 750 ft	440 – 528 ft		780 ft††		1,000 – 1,300 ft	
Urban	600 – 1,200 ft	750 ft	500/1,000 ft† (existing/new routes)	1,000ft	800 – 1,360 ft	750 – 1,300 ft	750 ft
Suburban	1,000 – 1,500 ft	1,000 ft	1,000 ft†	As needed		1,000 – 1,300 ft	1,050 – 1,760 ft (1/3 mi)
Rural		As needed	As needed				

† Minimum Stop Spacing Standard  
 †† Downtown / Regional Activity Centers

**Attachment 3**

[Maryland Transit Authority Bus Stop Optimization study](#), p. 5.

***Bus Stop Optimization Pilot Program Spacing Standards***

Land Use Type	Spacing	Target Average	Additional Notes				
Downtown	750 – 1,000 ft	2 blocks	Locate stops at every location with intersecting local MTA transit service. Pay special attention to optimizing access to major trip generators.				
Urban Areas	750 – 1,320 ft (1/4 mi)	1,000 ft	The minimum spacing is recommended for locations at major activity centers and destinations.				
Suburban Areas	1,000 – 2,640 ft (1/2 mi)	1,320 ft (1/4 mi)	Maximum spacing is recommended for locations along a route with little development.				
Suburban Activity Centers	750 – 2,640 ft (1/2 mi)	1,320 ft (1/4 mi)	Where warranted in suburban activity centers, the minimum stop spacing is reduced to 750 feet to enable improved access to stops. Maximum spacing is only appropriate in locations with poor accessibility or lack of trip generators.				
Urban	600 – 1,200 ft	750 ft	500/1,000 ft+ (existing/new routes)	1,000ft	800 – 1,360 ft	750 – 1,300 ft	750 ft
Suburban	1,000 – 1,500 ft	1,000 ft	1,000 ft+	As needed		1,000 – 1,300 ft	1,050 – 1,760 ft (1/3 mi)
Rural		As needed	As needed				