



**Massachusetts Bay
Transportation Authority**

GLX Title VI Equity Analysis

Fiscal and Management Control Board

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Lynsey Heffernan

GLX Title VI Equity Analysis

According to the FTA's Title VI Circular 4702.1B, the MBTA must conduct a service and fare equity analysis six months prior to the beginning of revenue service for new fixed guideway capital projects.

- This analysis was completed following the MBTA's Disparate Impact/Disproportionate Burden (DI/DB) policy.
- CTPS Title VI equity analysis finds the GLX extension service changes provide a *disparate benefit to non-minority riders and a disproportionate benefit to non-low-income riders.*



Title VI Analysis and Proposed Mitigation

- Given the significant capital investment, and lack of any practicable alternatives, the MBTA proposes to move forward with the GLX, noting the following:
 - The demographics of the neighborhoods encompassing the GLX project have changed in recent years.
 - Neighborhoods closest to GLX are receiving increased service.
 - This project provides a net benefit to both protected and non-protected groups. The 2014 “Green Line Extension Environmental Analysis” found that the project improved accessibility, mobility, congestion and environmental conditions, for EJ and non-EJ populations.
- Per our policy, MBTA should take steps to avoid, minimize, or mitigate this potential disproportionate benefit, where practicable. We propose:
 - Continuing the Route 80, duplicative bus service running parallel to the new service, while completing Bus Network Redesign.
 - The MBTA will continue to make improvements to our bus network through BNRD’s equity-focused process.



Bus Network Redesign

The Bus Network Redesign is focused on building a *better and more equitable network* than what we had pre-COVID

- A major goal of the project is to maximize access to opportunities and improve service quality for transit-critical populations (low-income populations, people of color, seniors, people with disabilities, or people who live in households with few or no vehicles). This is how we are measuring success.
- The MBTA believes, rather than proposing a reactive mitigation to the Green Line Extension's disproportionate/disparate benefit, we should make thoughtful changes to our bus network moving forward that benefit our low-income riders and riders of color.



Board Vote to Accept Title VI Analysis & Mitigation

- **WHEREAS**, the Massachusetts Bay Transportation Authority (“MBTA”) is in the final stages of constructing the Green Line Extension (“GLX”); and
- **WHEREAS** the Federal Transit Administration (“FTA”) Title VI Circular 4702.1B requires the MBTA to conduct a service and fare equity analysis within six months prior to the beginning of revenue service for a new fixed guideway capital project to determine whether such service would have a discriminatory impact based on race, color, or national origin; low-income populations would bear disproportionate burdens of the planned changes; or non-minority or non-low-income populations would receive disproportionate benefits because of the planned changes; and
- **WHEREAS** GLX will be a revenue service requiring a fare and service equity analysis under FTA Title VI Circular 4702.1B; and
- **WHEREAS** a fare and service equity analysis as to GLX was completed (the “Title VI Equity Analysis”); and
- **WHEREAS** the Title VI Equity Analysis did not find that GLX will have a disproportionate burden or adverse impact on low-income or minority riders; and
- **WHEREAS** the Title VI Equity Analysis further demonstrates that, under the MBTA’s Disparate Impact/Disproportionate Burden Policy (“DI/DB Policy”), GLX may provide a potential disproportionate benefit non-low-income and non-minority riders; and
- **WHEREAS** the MBTA considers a disproportionate benefit to non-low-income or non-minority riders to be a disproportionate impact on low-income and minority riders;
- **WHEREAS** pursuant to the MBTA’s DI/DB Policy, upon finding a potential disparate impact on minority populations, the MBTA must consider alternatives or revisions to the proposed service change to avoid, minimize or mitigate the potential adverse effect from the change; and upon finding a potential disproportionate impact on low-income populations, the MBTA must take steps to avoid, minimize, or mitigate such impacts, where practicable;
- **WHEREAS** the MBTA considered alternatives and revisions to the proposed change and steps to avoid, minimize or mitigate such impacts; and
- **WHEREAS** the MBTA determined that there were no practicable near-term alternatives or changes to GLX to mitigate such impacts;
- **WHEREAS** the MBTA therefore proposes to mitigate the potential disproportionate impact through its Bus Network Redesign, which program is underway and due for adoption in 2022, and which program should benefit low-income and minority riders in the future;
- **WHEREAS** the Fiscal and Management Control Board (“FMCB”) has considered and reviewed the Title VI Equity Analysis and the proposed mitigation;
- **NOW, THEREFORE, IT IS VOTED THAT:** The FMCB hereby approves the Title VI Equity Analysis and directs the Authority, through the General Manager, to take all steps necessary to provide notice of such acceptance to FTA, as appropriate.

