



Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Phillip Eng, Interim MassDOT Secretary and MBTA General Manager & CEO



Date: April 27, 2026
To: MBTA Board of Directors
From: David Perry, Director of Ferry Operations
Rachel Morse, Senior Director of Transit Policy
Re: Equity Analysis Finding of Disparate Benefit for Non-Minority Riders of New Ferry Service

EXECUTIVE SUMMARY

As a matter of state policy clearly articulated by the legislature through funding decisions and by the Governor in her leadership, the Commonwealth is embracing the growth of water transportation options in the Greater Boston area. Between the spring of 2022 and spring of 2023, the MBTA began or took over operation of three seasonal ferry routes, the route F3 East Boston Ferry, the route F5 Lynn Ferry, and the route F6 Winthrop/Quincy Ferry¹.

The introduction of this new service requires an equity analysis under FTA Title VI Circular 4702.1B and the MBTA's Service and Fare Change Equity Policy. CTPS conducted an equity analysis of these new, seasonal ferry routes and found that the new service provides a disparate benefit for non-minority populations. While the new ferry routes increased service and access to water transportation between the downtown core and East Boston, Lynn, Winthrop, and Quincy, these increases are experienced slightly more by non-minority riders than by riders who are members of populations protected on the basis of race or ethnicity. As provided by the FTA Circular and MBTA policy, the MBTA implemented these service changes based on a substantial legitimate justification, with the goals of ameliorating traffic congestion and mitigating the disruptions caused by subway and commuter rail diversions during a number of safety- and maintenance-critical projects that significantly impacted travel across the Boston area. New ferry service also serves to expand the availability of water transportation as a sustainable, affordable, and accessible transit option for residents and workers in the region. There are *no* comparably effective alternatives available that would result in less disparate impacts.

Because the MBTA demonstrates a substantial, legitimate justification for the service changes, because there are no reasonably comparable alternatives that would result in less disparate impacts, and because the justification for the changes is not a pretext for discrimination, MBTA staff recommend that the Board of Directors vote on May 28, 2026 to

¹ For the period of analysis, ferry service to Winthrop and Quincy was provided together in a single route. Recent service changes made possible by the MBTA's acquisition of two additional ferry boats have allowed the separation of Winthrop-Boston and Quincy-Boston service into two routes, and Quincy-Boston service is now provided as route F7.

accept the CTPS equity analysis of new seasonal ferry service to East Boston, Lynn, Winthrop and Quincy.

SERVICE CHANGES

Between the spring of 2022 and spring of 2023, the MBTA began or took over operation of three seasonal ferry routes, the route F3 East Boston Ferry, the route F5 Lynn Ferry, and the route F6 Winthrop/Quincy Ferry.

The East Boston Ferry is a seasonal ferry route that operates between East Boston and Long Wharf in spring, summer, and fall. The MBTA operated the East Boston Ferry for 3 weeks in the spring of 2022, offering ferry service as an alternative to shuttle buses while the Blue Line was closed for maintenance. The East Boston Ferry saw approximately 1,750 daily riders during its initial run, and its popularity prompted the state legislature to fund seasonal service for the fall of 2022 and spring of 2023. The East Boston Ferry resumed operations for 2.5 months in fall 2022 and then ran again from the end of March through November 2023. It has run seasonally, April through November since 2024.

The Lynn Ferry is a seasonal ferry route that operates between Boston and Lynn in spring, summer, and fall. The ferry was operated for a time by the City of Lynn, although prior to 2023, the route had not been in service since 2017. In June 2023, the MBTA assumed operation of the Lynn Ferry, in part to support the availability of travel alternatives from the North Shore into Boston during the July and August 2023 closure of the Sumner Tunnel. Lynn Ferry service was one of a suite of transit options offered as a mitigation to the unprecedented traffic congestion anticipated during the tunnel closure. Other transit mitigations included fare-free Blue Line service, affordable Commuter Rail, and discounted or free parking. The Lynn Ferry service also served as an alternative transit option during the closure of Lynn Central Square Commuter Rail station through the second half of 2023. The MBTA operated the Lynn Ferry for 4 months in 2023, 7 months in 2024, and seasonally in 2025 for April through November.

The Winthrop/Quincy ferry is a seasonal route that provides service between Winthrop, Quincy, and Boston in spring, summer, and fall. Until the end of June 2023, the Winthrop Ferry was operated by the Town of Winthrop. As a mitigation for the Sumner Tunnel closure, the MBTA assumed control and operation of the route beginning in early July 2023 and temporarily reduced fares. The MBTA operated the Winthrop/Quincy Ferry as a circuit for 5 months in 2023 and 7 months in 2024. In 2025, the acquisition of two new boats allowed the MBTA to split the Boston to Winthrop and Boston to Quincy service into two separate routes and increase the number of one-way daily trips on each route.

APPLICATION OF SERVICE AND FARE CHANGE EQUITY POLICY AND FINDING OF DISPARATE IMPACT BENEFITTING NON-MINORITY RIDERS

The FTA Circular requires large transit providers to conduct a Title VI service equity analysis for any “major service change” as that term is defined in the transit provider’s policy. The MBTA’s Service and Fare Change Equity Policy defines major service change as “any addition, reduction, suspension or change in service lasting longer than 12 months consecutive and meeting one or more of the following criteria:

- A change of at least 10% in Revenue Vehicle Hours (RVH) per week by mode;
- A change of at least 25% in RVH per week by route; or
- A change of at least 0.30% of the population covered by the entire network according to the base coverage standard established in the MBTA’s Service Delivery Policy.”

These criteria were selected as most likely to yield a meaningful result in light of the MBTA’s system characteristics. A major service change can be found when one or more of the thresholds are met within a single service change proposal, or within a package of concurrently proposed changes to be considered in the aggregate. CTPS determined that the added ferry service exceeds the major service change threshold for revenue vehicle hours at both the mode and route levels, thus triggering the need for a Title VI service equity analysis.²

Because the new ferry routes are seasonal, none of them have run – or will run – for 12 months consecutive as needed to qualify as a major service change under the policy definition. Indeed, neither the FTA Circular nor the MBTA’s implementing policy address how to evaluate a permanent, intermittent service change. However, given that the definition of major service change is intended to capture smaller changes that, when considered in the aggregate, amount to a more substantial change, the MBTA has elected to conduct a service equity analysis on the cumulative changes to ferry service over the first few seasons.

The new ferry service meets the definition of major service change based on change in revenue vehicle hours. Accordingly, CTPS analyzed the prescribed equity ratios for a change in revenue vehicle hours to determine if the service change will have a discriminatory effect on populations protected on the basis of race or ethnicity or on low-income populations. Applying the formulas established in the Service and Fare Change Equity Policy, CTPS found that the ferry service changes, albeit very small as compared against the entire transit system, will introduce a disparate impact on populations protected on the basis of race or ethnicity by disproportionately benefitting non-minority riders.³ Specifically, the increase in revenue vehicle

² The change does not reach the threshold when measured as a function of geographic coverage and population reach.

³ For context, although the new service is a large enough change in route and mode-level revenue vehicle hours to qualify as a major service change, the change in system-wide revenue service available to both protected and non-protected populations is very small. For the disparate impact analysis, service hours increase for both groups by

hours for protected populations was 0.21% as compared to a 0.33% increase for non-protected populations. This yields a ratio of 0.65 which is less than the required 0.8 to pass the analysis and demonstrates a disproportionate benefit accruing to non-protected groups. CTPS found that the service changes do not introduce a disproportionate burden on low-income populations.

MBTA RESPONSE TO EQUITY ANALYSIS FINDING

Both the FTA's Title VI Circular and the MBTA's Service and Fare Change Equity Policy provide guidance for how to proceed upon this small disproportionate benefit finding.

The FTA's Title VI Circular States:

If a transit provider chooses not to alter the proposed service changes despite the potential disparate impact on minority populations, or if the transit provider finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service change, the transit provider may implement the service change only if:

- the transit provider has a substantial legitimate justification for the proposed service change, **and**
- the transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals. It is important to understand that in order to make this showing, the transit provider must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Similarly, the MBTA's Service and Fare Change Equity Policy states:

Consistent with the FTA Circular, if the proposed change will have a disparate impact on riders or potential riders who are protected on the basis of race or ethnicity, the MBTA may only adopt the change upon demonstrating: (1) a substantial legitimate justification for the change; (2) there are no comparably effective alternatives that would result in less-disparate impacts; and (3) the justification for the change is not a pretext for discrimination.

less than half of a percent. The revenue vehicle hours added through the new ferry service are not a large enough change to influence the system-wide distribution of service between protected and non-protected populations.

Justification for the Service Change; No Comparably Effective Alternatives That Would Accomplish the Program Goals

Unlike a typical planned service expansion, the three new ferry routes were themselves implemented in part to mitigate the impacts of significant travel disruptions in the region. The East Boston ferry service was launched in spring 2022 to offer riders an alternative to shuttle buses during the closure of the Blue Line for crucial maintenance work ahead of the Sumner Tunnel closure. In 2023 with the addition of the Lynn and Winthrop ferries, all three ferry routes served as transit alternatives during the Sumner Tunnel closures of July and August 2023, and again during the tunnel closure in summer 2024. From the North Shore, the Lynn Ferry also provided an alternate way to reach Boston during the safety-critical, 14-month closure of the Lynn Central Square Commuter Rail station.

The MBTA found no comparably effective alternatives for the new ferry routes that could accomplish the goals of mitigating disruptions to existing Blue Line and Commuter Rail service and reducing traffic congestion diverted from the Sumner Tunnel, particularly where options to locate water transportation are necessarily constrained by geography.

Ongoing Investment in Water Transportation

It is also important to consider the growing role of water transportation as an important component of Greater Boston's complex transit ecosystem. Beyond the three new routes subject to this equity analysis, the Healey administration has committed to investing in "projects that make water-based transportation a faster, more affordable, and more accessible option for residents" as part of a "broader effort to reduce road congestion and make daily travel easier for residents and workers in the region."⁴ Water transportation is a sustainable transit option that supports reduced pollution and improved air quality by helping to take cars off the road. It is "not just about convenience – it's about equity, sustainability, and investing in the long-term growth of our communities."⁵ Advocacy from state legislators secured funding for MBTA ferry operations which will "help[] ease traffic congestion, improve commuter reliability, and offer a greener, more efficient transit option."⁶

MassDOT is now leading a water transportation study grounded in the fact that "water transportation in Greater Boston has grown significantly over the past few years, and opportunities exist for even more improvements in the future."⁷ The study acknowledges the importance of ferry service as "an important resource that supports growing neighborhoods. It can provide convenient transit in communities with limited public transportation options and increase the resilience of the larger transportation network, especially when there are disruptions to subway or Commuter Rail service." The study is intended to develop a plan that

⁴ <https://www.mass.gov/news/healey-driscoll-administration-awards-over-23-million-to-expand-waterfront-ferry-and-water-transportation-on-boston-harbor>

⁵ <https://www.lydiaedwards.org/post/edwards-delivers-on-expanded-ferry-service>

⁶ <https://www.lydiaedwards.org/post/edwards-delivers-on-expanded-ferry-service>

⁷ <https://www.mbta.com/projects/water-transportation-study>

strengthens long-term resiliency and supports a future-ready ferry system; identifies upgrades to improve the ferry experience for all riders; identifies multimodal access improvements to current and potential future ferry dock locations; and evaluates the possibility of potential future route expansion opportunities in busy neighborhoods. As new services are planned, the MBTA will continue to evaluate the equity impacts of potential expansions.

CONCLUSION

Because the MBTA demonstrates a substantial, legitimate justification for the service changes, because there are no reasonably comparable alternatives that would result in less disparate impacts, and because the justification for the changes is not a pretext for discrimination, MBTA staff recommend that the Board of Directors vote on May 28, 2026 to accept the CTPS equity analysis.