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Phillip Eng, Interim MassDOT Secretary and MBTA General Manager & CEO



Date: April 27, 2026
To: MBTA Board of Directors
From: Michael Muller, Executive Director of Commuter Rail
Rachel Morse, Senior Director of Transit Policy
Re: Equity Analysis Finding of Disparate Benefit for Non-Minority Riders of South Coast Rail Service

EXECUTIVE SUMMARY

In March 2025 following decades of planning, the MBTA began service on South Coast Rail, bringing the long-awaited return of passenger rail service to southeastern Massachusetts, including the Gateway Cities of Taunton, New Bedford, and Fall River.

This new service amounts to a “major service change” which requires a Title VI equity analysis under FTA Circular 4702.1B and the MBTA’s own Service and Fare Change Equity Policy.¹ CTPS conducted an equity analysis of Phase 1 of South Coast Rail, which is an extension of the Middleborough line, and found that the service changes provide a disparate benefit to non-minority populations. While the extended line increases access to rail service for all residents of the service area and reconnects the South Coast to Boston via passenger rail for the first time since 1958, the increase is experienced slightly more by non-minority individuals than by individuals who are members of populations protected on the basis of race or ethnicity, in proportion to the general demographic makeup of the area. Importantly, however, while the new service was found slightly to disproportionately benefit non-minority populations, CTPS’s analysis also found that the service delivers a greater benefit to low-income populations than to populations that are not low income. As provided by the FTA Circular and MBTA policy, the MBTA implemented the service change based on a substantial legitimate justification, delivering on decades of promises and planning, and with goals of supporting jobs, economic growth, and opportunities for affordable housing access in the region. With the delivery of Phase 1, the new service is now providing benefits for employment, economic growth, housing, and the environment as it reconnects to jobs for the South Coast region and brings better commutes, creates opportunities for affordable housing access, and encourages travelers to shift from cars to public transportation, thus reducing traffic congestion and greenhouse gas emissions and promoting improved air quality.

Because the MBTA demonstrates a substantial, legitimate justification for the service change, because there are no reasonably comparable alternatives that would result in less disparate impacts, and because the justification for the change is not a pretext for discrimination,

¹ MBTA Service and Fair Change Equity Policy available at <https://www.mbta.com/policies/service-and-fare-change-equity-policy>

MBTA staff recommend that the Board of Directors vote on May 28, 2026 to accept the CTPS equity analysis of new service on South Coast Rail.

SERVICE CHANGE

The South Coast Rail project brought passenger rail service to southeastern Massachusetts for the first time in nearly 70 years by expanding the Fall River/New Bedford Line (formerly known as the Middleborough/Lakeville line) on the Commuter Rail and introducing six new, fully-accessible stations:

- Middleborough (replacing the former Middleborough/Lakeville station)
- East Taunton
- Freetown
- Fall River Depot
- Church Street
- New Bedford

Trains run every 70 minutes on weekdays and provide 32 direct trips to or from South Station, including 15 trips between South Station and Fall River, and 17 trips between South Station and New Bedford. On weekends, trains run every two hours and there are 26 total trips.

In addition to the 32 direct trips to or from South Station on weekdays, connecting trains operate between Fall River Depot and East Taunton station and between New Bedford station and East Taunton station.

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

FTA Circular 4702.1B 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.”²

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

² MBTA Service and Fair Change Equity Policy at p. 2.

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 South Coast Rail service exceeds the major service change threshold, the second item listed above, because revenue vehicle hours per week by route increased by more than 113% across the Middleborough and Fall River/New Bedford Lines. The MBTA must therefore conduct Title VI service equity analysis.

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 new South Coast Rail service will introduce a disparate impact on populations protected on the basis of race or ethnicity by disproportionately benefitting non-minority riders. Specifically, the increase in revenue vehicle hours for protected populations was 0.27% as compared to a 0.50% increase for non-protected populations. This yields a ratio of 0.53 which is less than the required 0.8 to pass the analysis, and demonstrates a small disproportionate benefit accruing to non-protected groups³. CTPS also found that the service change does *not* introduce a disproportionate burden on low-income populations. That is, low-income populations received a greater share of the added service hours than non 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 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

³ The distribution of benefits of the new service reflects the demographic makeup of the South Coast service area, which has a smaller proportion of protected populations than the MBTA systemwide service area as a whole. Census data show 3.4 times as many members of non-protected populations as protected populations living in the twenty municipalities impacted by the increased service. CTPS Technical Memorandum Table 1 at p. 5.

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.⁴

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.

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

South Coast Rail opened in March of 2025, following decades of planning to bring reliable, affordable rail service back to southeastern Massachusetts for the first time since 1958. Planning for the project began in the 1980s and was the subject of much study, analysis, and engagement before the Commonwealth was finally able to break ground and begin construction in 2019. South Coast Rail now brings service to the Gateway Cities of Taunton, New Bedford, and Fall River, the only three major cities within 50 miles of Boston that did not have Commuter Rail access. Reconnecting these underserved communities to passenger rail is a key infrastructure investment for the Commonwealth and delivers a long-awaited increase in transit access for an area of the state that includes several environmental justice communities.

As the service was planned over the course of several decades, MassDOT and the MBTA conducted a number of environmental and equity analyses during different stages of planning. Feasibility studies were released in 1990 and 1995. Planning was temporarily suspended in 2002 due to increasing costs but was later resumed, and in 2008, CTPS conducted an environmental justice study that examined the geographic distribution of benefits and burdens of the proposed project. That analysis relied on the then state Executive Office of Environmental Affairs' definition of an environmental justice population, which factored in Census block groups' median annual household income, and demographic information about race, ethnicity, nationality, and rates of limited English proficiency. In 2009, and again in 2017, CTPS further evaluated equity using their FTA-approved travel demand model. Additional environmental impact statements were completed in 2011, in accordance with FTA Circular 4702.1A, the precursor to the current Title VI Circular 4702.1B, and again in 2013. At all stages, **the proposed project was approved to proceed**, and has been supported throughout by the legislature and gubernatorial leadership, notably with significant investment of Commonwealth resources.

⁴ [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA Title VI FINAL.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf) at Chap. IV-16

In 2017, in response to high costs and an extended construction timeline, the project was divided into two phases. The six new stations on South Coast Rail represent Phase 1 of the project. The “full build” will extend the Stoughton line south to connect additional communities to the Fall River/New Bedford line. With the decision to break the project into phases, MassDOT conducted a supplemental alternatives analysis that screened seven service alternatives before selecting the option with the greatest operational flexibility and shortest distance and travel times for passengers from the South Coast to Boston. The selected option for Phase 1 also minimized environmental impacts from new infrastructure, provided service sooner, and avoided interference with future Cape Cod service, all in alignment with the original project goals. It also avoided the need for trains to make any time-consuming reverse moves.

With the selection of the Phase 1 alternative, CTPS updated their environmental justice analysis. The updated analysis found that there would be **no disproportionate adverse impacts on environmental justice populations**, including no adverse impacts related to property acquisition, socio-economic conditions, noise, vibration, air quality, public safety, or access and travel. It was determined that the phased service would benefit environmental justice communities sooner than expected with the full build. Throughout the planning process, MassDOT and the MBTA held multiple public meetings and briefed elected officials, planners and other state and federal stakeholders.

With the delivery of Phase 1, the new service is now providing benefits for employment, economic growth, housing, and the environment as it reconnects to jobs for the South Coast region and generates economic development, brings better commutes, creates opportunities for affordable housing access, and encourages travelers to shift from cars to public transportation, thus reducing traffic congestion and greenhouse gas emissions and promoting improved air quality.

CONCLUSION

Because the MBTA demonstrates a substantial, legitimate justification for the service change, 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.