

Title VI and Executive Order on Environmental Justice Complaint

To: Federal Transit Administration, Office of Civil Rights

Agency: Atlanta Regional Commission and Georgia Regional Transportation Authority

Re: Governor's Congestion Mitigation Task Force Recommendations

From: Atlanta Transit Riders' Union

In early 2006 the Atlanta Regional Commission (ARC), Georgia Regional Transportation Authority (GRTA) and Georgia Department of Transportation (GDOT) adopted the recommendations of the Governor's Congestion Mitigation Task Force [1]. The Task Force, appointed by Governor Sonny Perdue to evaluate solutions to Atlanta's traffic congestion, had three main recommendations:

- Weighting congestion relief at 70 percent in the project selection process for the fiscally constrained Regional Transportation Plan (RTP),
- A consistent and transparent methodology for cost/benefit analysis,
- A travel time index as the method of measuring improvements with the goal of 1.35 by 2030 [2].

This emphasis on congestion relief explicitly prioritizes the transportation needs of peak-hour, high volume corridor drivers, who tend to originate in higher income block groups, over the transportation needs of the transit dependent, low-income, people of color, elderly, disabled, and youth populations. While buses do travel on congested roadways, congestion relief without improved transit service will not significantly benefit transit dependent populations. Even if new transit is part of the congestion relief solution, the existing demographic divide between express bus and MARTA riders in Atlanta demonstrates that transit built to relieve congestion does not serve the needs of low-income transit riders.

Using a travel time index to measure improvements ignores the impacts of this policy on transit riders. A travel time index compares the time it takes to make a trip during congested times of day to the time it takes at free flow conditions [2]. While this could apply to a transit trip it leaves out other critical variables such as headway, availability of service and number of transfers.

A review of the latest RTP for Atlanta, *Envision6*, adopted under the congestion relief weighting demonstrates the limited benefits to the transit dependent. Given the inadequate transportation resources available, the weighting of congestion relief is the "denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations [3]."

The decision-making process for prioritizing transportation projects needs to be changed to give equal value to all trips and all trip-makers. The weighting for congestion relief needs to be reduced and balanced by weighting for accessibility for the transit dependent. In addition, the region should set a goal of 1.35 for a transit time index, which measures the difference between transit travel time and car travel time for the same trip in peak hours.

See the attached for supporting materials and signatories.

Supporting Materials

The recommendations of the Governor’s Congestion Mitigation Task Force are geared toward serving the transportation needs of drivers. While congestion does impact the speed of bus travel, a 70 percent weighting for congestion relief in the project selection process will not ensure improved transportation for transit riders. The travel time index measures the improvements in the travel time of people driving, not overall transportation accessibility improvements for all residents of the region.

Congestion weighting not only prioritizes the needs of drivers, it prioritizes the transportation needs of peak-hour drivers. In the summer of 2006 researchers at GA Tech identified license plates of the morning rush hour drivers traveling southbound on interstates on the north side of Atlanta. Using the license plate data they mapped the registration addresses of the cars in the Atlanta region. (After cleaning the data 16,938 unique addresses were generated.) Using 2000 census data they analyzed the demographics of the block groups represented in the sample and compared them to the base demographics of the county using the statistical tests. They found that “rush hour commuters were over represented in households making more than \$60,000 a year... and highway commuters had a household income almost 15% greater than other [base counties] residents[4].”

Even if the congestion weighting does prioritize transit projects they are transit projects geared toward the needs of choice riders. Transit service designed to relieve congestion often only operates at weekday peak hours and on high volume roadways or corridors. This service is designed to serve the work trip between suburban residential locations and downtown or suburban employment dense locations. This type of service does not serve the needs of the transit dependent who need to travel outside of peak hours, are not traveling to the limited locations served, or cannot access the transit service that is accessible only by car.

The existing congestion relief transit project in Atlanta (Xpress bus service) does not serve the transit dependent. The demographics of riders on express buses are in stark contrast to the demographics of MARTA riders (see Figure 1).

Figure One. 2006 Reported Income of MARTA and Express Bus Riders

MARTA			XPRESS	
Under \$10,000	22%	50%	3%	Under \$20,000
\$10,000-\$19,999	28%			
\$20,000-\$29,999	33%	44%	17%	\$20,000-\$49,999
\$30,000-\$39,999	8%			
\$40,000-\$49,999	3%			
\$50,000-\$74,999	3%	6%	39%	\$50,000-\$100,000
Over \$75,000	3%			
			22%	Over \$100,000
			15%	Refused
			4%	Don't Know

Source: [5, 6]

Fifty-seven percent of MARTA riders stated they were using MARTA because no car was available for their trip. In contrast only six percent of Xpress bus riders stated they were using Xpress because they did not have a car or could not drive. Seventy percent of express bus riders from Cobb County own two or more vehicles [5-7].

The vast majority of MARTA riders are people of color (76 percent Black, nine percent Hispanic, one percent Asian Pacific, and one percent 'Other' race) [6]. Compared to 13 percent of MARTA passengers, 48 percent of express bus passengers are white [5]. (It should be noted that another 10 percent of express bus passengers refused to indicate their race on the survey).

Express bus service in Atlanta only runs during peak hours. Xpress does offer reverse commute service on the majority of its routes but at a ratio of three commuter runs for every reverse commute run [7]. Even with reverse commute options, starting or ending your trip in a park and ride lot in suburban Atlanta is not accessible for people without cars. The majority of suburban express bus stops have no local bus service and limited pedestrian infrastructure.

GRTA advertises its Xpress service as: "Xpress is the Atlanta region's premier commuter transportation service, with luxury coaches carrying riders throughout the region Monday through Friday. With plenty of legroom, reclining seats, luggage racks, electrical outlets (some seats) and reading lamps — it's a first class way to ride!" [8]. In comparison, local bus service throughout Atlanta is second class service.

Existing local transit service is not in a state of good repair: headways are infrequent, service is unavailable on the weekends and at night, and limited land area is served. The average headway of a local bus is 30 minutes peak service and 40 minutes off peak. Weekend service, when available, runs on average 45 minute headways. Of the five counties with local bus service only 32 percent of the land area is in walking distance to transit [9]. It is clear that continuing to fund express bus and other congestion relief transit without funding local transit service will leave behind dependent transit riders.

Envision6, the current RTP for the Atlanta region, explicitly plans transit for choice riders. The ARC in their public materials for *Envision6* state:

- New Transit Options – For those willing to forego their automobile occasionally, several new services will be provided which will allow them to avoid roadway congestion.
- Providing Travel Options – Segments of the population do not have access to transit and must use automobiles to travel. Expanding travel options for residents improves both the quality of life and increases economic opportunity [10].

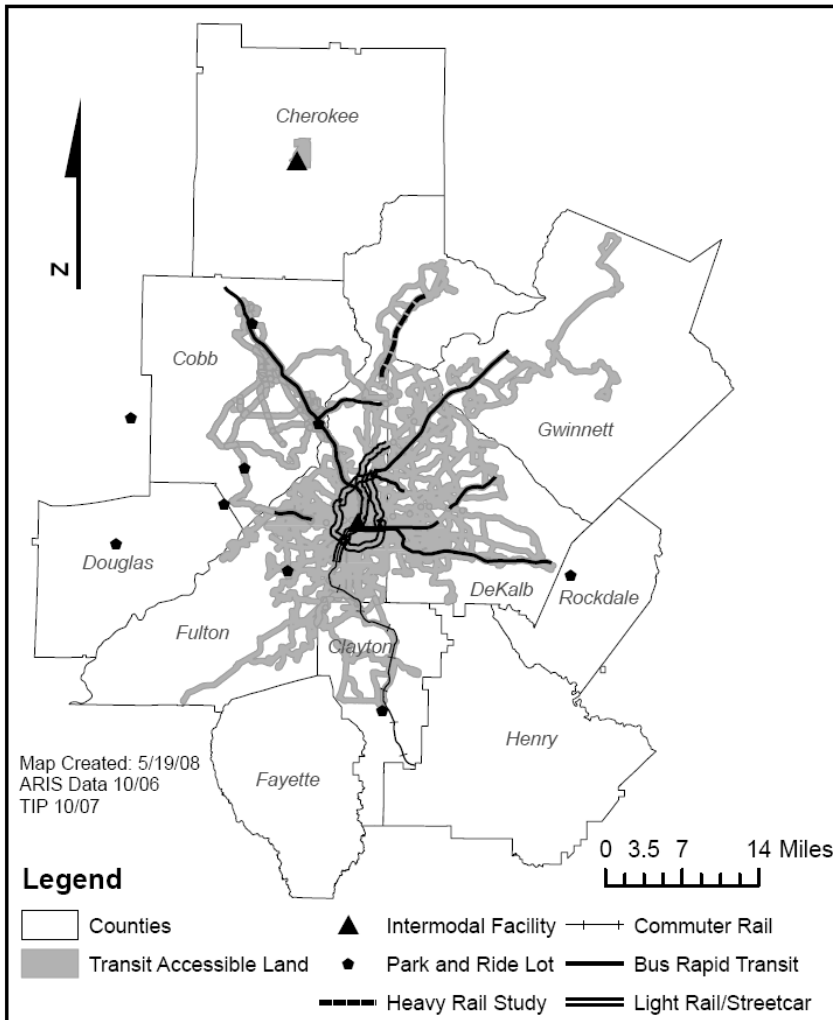
No mention is made of the people who have no access to automobiles to forego occasionally and must rely on transit for all of their trips.

The 2008-2013 TIP that accompanied *Envision6* is an over \$10 billion infrastructure investment. Benefits to the transit dependent are limited to the 16 percent set aside for transit and four percent for pedestrian and bicycle projects. The 16 percent for transit includes the FTA formula and program funding for the Atlanta region and limited investment in new service projects. Not surprisingly the new service projects are primarily congestion relief transit projects –commuter rail, bus rapid transit on interstates and arterials, and express bus service.

Without local bus service (and improved pedestrian infrastructure) these projects will have limited benefit to the transit dependent. Due to lack of funding local bus service is decreasing in Atlanta, MARTA's peak hour buses in service fell from 580 in 2000 to 451 in 2006[11]. The emphasis on congestion relief transit projects is likely to monopolize the limited additional sources of operating resources to serve choice riders.

The two projects in the TIP that lend themselves to local service (the Beltline and the Peachtree Streetcar) are in areas that already have local transit service. Under *Envision6* very little land area is added to the already limited transit accessible area in the region (See Figure 2). The new projects that extend outside the existing transit accessible area are congestion relief projects so the new accessible area will be limited to the area in walking distance to their limited stations. In addition, the new service is skewed toward the northern side of Atlanta, which historically has been richer and whiter.

Figure 2. Envision6 Transit Projects in TIP



In 2005 in the metropolitan region just under 30 percent of households and 35 percent of jobs were in walking distance to transit[12]. The ARC projects that in 2030 if all the Envision6 transit projects are built the households in the region within walking distance to transit will still be under 30 percent and the employment will be just over 30 percent [12]. This is a decrease from the current conditions.

The congestion weighting in the project selection at the ARC and GRTA explicitly prioritizes projects that benefit higher income, car owners, peak corridor drivers at the expense of low-income, people of color, and disabled transit riders traveling at all times and on all corridors. Even the transit selected under this method does not serve the transit dependent.

Recommendations for remedying this inequity:

1. Reduce the weighting for congestion relief in the project selection process to equal the other criteria, include accessibility for the transit dependent as a criterion for public transit projects.
2. Add a goal of a transit time index of 1.35 by 2030, where transit time for a trip is no more than 35% more than auto travel time during peak hours.
3. Develop regional transit service standards to ensure adequate transit service to areas with above a set density of jobs and housing and to all community and government sites (parks, courthouses, libraries, colleges, etc).
4. In order to ensure that similar inequities are not passed in the future, change the voting structure on the ARC board to proportional voting based on county population.

1. Donsky, P., *Transportation formula reworked; Congestion No. 1 reason for funding*, in *Atlanta Journal-Constitution*. 2006, Cox: Atlanta.
2. Governor's Congestion Mitigation Task Force, *Final Report and Recommendations of the Governor's Congestion Mitigation Task Force*. 2005, State Department of Transportation, Atlanta Regional Commission, Georgia Regional Transportation Authority, State Road and Tollway Authority: Atlanta, GA.
3. US Department of Transportation, *An Overview of Transportation and Environmental Justice*, Federal Transit Administration, Editor. 2000, US DOT: Washington DC.
4. Nelson, J.I., R. Guensler, and H. Li, *A Geographic and Demographic Profile of Morning Rush Hour Commuters on Highways in North Metropolitan Atlanta*, in *Transportation Research Board 87th Annual Meeting*. 2008, Transportation Research Board: Washington DC.
5. ILIUM, *Atlanta Region Xpress Bus Rider Survey*. 2006, Georgia Regional Transportation Authority: Atlanta, GA.
6. MARTA, *Results of Onboard Survey*. 2006, MARTA: Atlanta, GA.
7. URS, *Cobb County Transit Planning Study, Executive Summary*. 2006, Cobb County Transit: Marietta, GA.
8. Georgia Regional Transportation Authority. *Xpress*. 2008 [cited May 13, 2008]; Available from: www.xpressga.com.
9. Atlanta Transit Riders' Union, *Transit Riders' Vision for Regional Transit in Atlanta: A Plan from the Perspective of Dependent Transit Riders*. 2008, Atlanta Jobs with Justice: Atlanta, GA.
10. Atlanta Regional Commission, *Factsheet: FY 2008-2013 Transportation Improvement Program*. 2007, Atlanta Regional Commission: Atlanta, GA.

11. National Transit Database, *Metropolitan Atlanta Rapid Transit Authority*. 2006, Federal Transit Administration: Washington DC.
12. Atlanta Regional Commission, *Envision6 Regional Transportation Plan*. 2007, Atlanta Regional Commission: Atlanta, GA.