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July 6, 2023

Megan Dunneisen
City Clerk – City of Watertown, WI
PO Box 477
106 Jones St
Watertown, WI 53094

Re: Watertown corner stop transit service

WisDOT's Compliance Site Review meeting with the City of Watertown on March 22, 2023 raised some concerns about the use of the public transit system for school trip purposes via a service referred to by the City as a "corner stop" service. The corner stop service is funded in part by Federal section 5311 funds, Formula Grants for Rural Areas, and State section 85.20 Urban Mass Transit Operating Assistance Program funds. FTA and state regulations do not allow these transit funds to be used to provide transit service exclusively to students (i.e., all trips funded by public transit funds must be clearly open to the general public, even if students are also using it). WisDOT has not received any evidence from the City of the corner stop service being utilized by anyone other than students.

WisDOT requested that the City of Watertown provide additional information about the corner stop service in an email dated May 11, 2023, and this information was provided by the City on June 23, 2023. In its response, the City noted that although the service was available and offered to the general public, the service was ultimately utilized only by students for trips to and from school as non-student members of the general public preferred the standard "curb-to-curb" demand response service. The City also indicated all corner stop trips were subscription trips paid with either cash fares or pre-paid coupons, and that no coupons were purchased by any local schools. The lack of utilization by non-students may or may not have been the result of the transit system's prior language on the public facing website indicating this was a service was "for middle school and high school students to and from school." Although the website language has been revised to specify this service is available to all members of the general public, WisDOT does not expect this language change to result in expanding service beyond student trips to and from school due to the nature of this service as subscription-based; operating in conjunction with the school schedule; and with all pickups and drop-offs occurring at defined corners for which times and locations are not communicated publicly.

WisDOT requires the City to discontinue the use of federal and state public transit operating funds and federally funded public transit vehicles in providing this service utilized exclusively by students. The Corrective Action Plan (CAP) issued to the City on April 27, 2023 has been amended to include the requirement to discontinue the use of public transit funds and vehicles for the student oriented corner stop service within 90 days of receipt of this email: October 4, 2023. Also within the 90 days window, the City will start providing WisDOT with ridership reports and trip denial reports on a quarterly basis in order for WisDOT to monitor compliance. Other items in the CAP are kept at the initial compliance window of August 7, 2023. The amended CAP is attached as well.

Considerations for serving student transit needs:

- ✓ If the City and/or the School District wish(es) to continue providing the corner stop service to students, they may do so with a source of funding other than public transit operating funds and without the use of federally funded public transit vehicles.
- ✓ The City may continue to provide rides to and from school for students using the standard demand response service provided that no preference is given to students versus other members of the general public, and all trips are made available as shared ride trips.
- ✓ The City may opt to establish one or more standard fixed routes using public transit funds to serve both students and the general public. Note the addition of a fixed route to the City's public transit operations would result in needing to meet additional state statutory requirements as shared-ride taxi systems are expressly exempt from some state requirements.

Thank you for your continued attention to this matter and please let us know if you have any follow up questions or comments at public.transit@dot.wi.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'I. Ritz', with a stylized flourish at the end.

Ian Ritz
Transit Section Chief