

SSTAC STRATEGIC PLAN – PAPER ON PEER UNMET NEEDS PROCESSES

INTRODUCTION

The Transportation Development Act (TDA) provides some guidelines for the process of identifying unmet transit needs. Nonetheless, there is a great deal of discretion in how the process is conducted. In order to help the SSTAC better understand what is expected of the process and to determine what is likely to work best for Humboldt County, this paper examines how peer transit systems conduct their processes.

The peer transit systems were selected for this analysis with some of the following considerations:

- Peers which have a similar level of transit service and/or geographic and demographic characteristics
- Peers which are attempting to address similar issues to those found in Humboldt County
- Peers which seem to have a successful process – either through diligent outreach, or through efficient analysis and reporting
- Peers for whom ample data was available

The processes outlined in this paper are being presented to the Humboldt County SSTAC so that they may better determine the direction for their own process in the future.

Function or Role of SSTAC in Peer Counties

The role or function of the SSTAC among peer regional transportation planning agencies was examined, as summarized in Table 1. The key roles of each entity include:

- HCAOG - Receive input from public (especially transit dependent); review comments, evaluate most common requests; use HCAOG criteria to determine unmet needs.
- Tahoe Regional Planning Agency (TRPA) – Monitor and promote improvements to public transportation.
- Placer County Transportation Planning Agency (PCTPA) - Direct the PCTPA board on unmet needs; direct in other matters as necessary.

- Tuolumne County Transportation Council (TCTC) - Participate in identification of unmet needs; make recommendations on findings; advise on any other major transit issues.
- Amador County Transportation Commission (ACTC) – Serve as an advisory committee on matters of transit for transit dependent; coordinate transit services to eliminate duplication, create efficiencies and save public funds; input into hearings and findings.
- Madera County Transportation Commission (MCTC) – Function as a citizen’s advisory committee, initial meeting to familiarize members with role; second meeting to hear comments; works with staff to develop recommendations to the commission on findings.

The language included for each agency ranges from informal to technical in describing the role of the SSTAC, and the function of each SSTAC ranges from a minimum of hearing comments and advising on findings, to acting as an advisory board beyond the unmet needs hearing process. The SSTAC role in Humboldt County is particularly active, with the SSTAC serving as a deliberative body making strong recommendations to the HCAOG Board. Many of the other SSTACs simply provide comments regarding input.

Definition of “Unmet Transit Needs” Among Peer Systems

The very basis of the unmet transit needs—identifying how “unmet transit needs” is defined—varies between the various regional transportation planning agencies. Table 2 identifies varying definitions adopted by the peer systems (including HCAOG’s definition). HCAOG’s definition is fairly specific, and includes a broad population (“residents who do not have access”), a wide range of trip purposes (medical care, shopping, social/recreational activities, education/training, and employment), and excludes primary and secondary school trips, and out-of-county trips. The language also excludes streets and roads.

The TRPA, PCTPA, San Joaquin Council of Governments (SJCOG) and MCTC definitions of unmet transit needs are short and broad, while the SRTA has a long list of qualifiers (population, trip purpose, ADA elements, priorities and exclusions). Like HCAOG, the SRTA specifically excludes primary and secondary school trips and out-of-county trips. The Lassen County Transportation Commission (LCTC) definition of unmet needs is framed with language that reads more as policy than the other definitions and also addresses priorities for transit dependents.

Definition of “Reasonable to Meet” Among Peer Agencies

Once “unmet transit needs” have been identified, each entity must then determine whether said needs are “reasonable to meet.” Again, each entity has its own approach in defining this. Table 3 identifies varying definitions of “reasonable to meet” used by the peer systems. The language of some agencies is very brief, while for others, extensive lists are provided, but all generally include the following common factors:

- New or expanded services which are feasible to operate and meet minimum requirements.
- Services which do not duplicate existing services.

Further, most agencies qualify that the service to be provided needs to have an existing funding source.

Peer Annual Reporting for the Unmet Transit Needs Process

Table 4 outlines the various activities and reporting which peer systems use for the unmet needs processes. As shown, some entities develop lengthy and in-depth reports, while others provide simple summaries. It should be noted that not all of the entities in the peer group are required to conduct formal unmet needs hearings, but do so only because they find the process valuable. In these cases (such as Nevada County and Lake County), the process and reporting is less formal.

The Shasta Regional Transportation Agency (SRTA) probably provides the most extensive reporting, and a lot of their outreach materials and reports are found on their website.

Peer Outreach for the Unmet Transit Needs Process

At a minimum, entities which do not expend all of their TDA dollars on transit must conduct a single, annual public hearing to receive public comments regarding unmet transit needs. Most entities go beyond the single hearing, and most conduct extensive outreach—including HCAOG. Table 5 highlights some of the outreach activities conducted by peer systems.

Best Examples

In terms of best examples, the Shasta Regional Transportation Agency and Butte County Association of Governments provide a lot of information on the function of their SSTAC and good graphics and information for the unmet needs process on their websites.

These can be found at <http://www.srta.ca.gov/146/Unmet-Transit-Needs-Process> and <http://www.blinetransit.com/Resources/Unmet-Transit-Needs-Process/index.html> .

Table 1: Function or Role of SSTAC in Peer Counties

Agency	Function / Role of Social Services Transportation Advisory Council
Humboldt County Association of Governments (HCAOG)	The SSTAC, as mandated by the TDA, leads the process in soliciting input from transportation-dependent and transportation-disadvantaged persons, and in recommending a finding to the HCAOG Board. The SSTAC and the Board review public comments, and evaluate the most common requests against HCAOG’s criteria for determining if an unmet transit need is reasonable to meet. ¹
Tahoe Regional Planning Agency (TRPA)	The purpose of the SSTAC is to monitor and promote improvements to those public transportation services for low income, transit dependent, persons with disabilities, and seniors residing in El Dorado and Placer Counties within the Tahoe Region. ²
Placer County Transportation Planning Agency (PCTPA)	The primary purpose of the SSTAC is to participate in the Unmet Transit Needs process and advise the PCTPA Board of Directors on Unmet Transit Needs findings. The Board is required to consult with and consider the recommendation of the SSTAC before making an annual Unmet Transit Needs finding. The SSTAC may also be asked to advise the Board on other major transit issues, especially regarding paratransit services. ³
Shasta Regional Transportation Agency (SRTA)	The SSTAC is a nine-member council appointed by SRTA. These members represent various groups of under-served transit users, as mandated. The SSTAC meets, as necessary, to provide recommendations to the SRTA on "unmet transit needs that are reasonable to meet" and other transit coordination issues. The current meeting agenda may be downloaded one week prior to the meeting. ⁴
Nevada County Transportation Commission (NCTC)	<ol style="list-style-type: none"> 1. To maintain and improve transportation services to the residents of Nevada County, particularly the elderly and disabled. 2. Review and recommend action to the NCTC relative to the identification of unmet transit needs and advise the Commission on transit issues, including coordination and consolidation of specialized transportation services. 3. Provide a forum for members to share information and concerns about existing elderly and handicapped transportation resources. ⁵
Butte County Association of Gov. (BCAG)	Unmet Transit Needs are those trips required, but currently not provided, and not scheduled to be provided within Butte County for individuals dependent on public transit to maintain a minimum standard of living. ⁶
Tuolumne County Transportation Council (TCTC)	<ul style="list-style-type: none"> -To annually participate in the identification of transit needs in the Tuolumne County Region, including unmet transit needs that may exist and may be reasonable to meet by establishing or contracting for new public transportation or specialized transportation services or by expanding existing services; -To annually review and recommend action by the TCTC, which finds by resolution that, a) there are no unmet transit needs, b) there are no unmet transit needs that are reasonable to meet, or c) there are unmet transit needs including needs that are reasonable to meet; and -To advise the TCTC on any other major transit issues. ⁷
Amador County Transportation Commission (ACTC)	The SSTAC is an advisory committee to the ACTC on matters pertaining to the transit needs of transit dependent and transit disadvantaged persons. The SSTAC also works to coordinate transit services needed or provided by different agencies and organizations to eliminate duplication of service, create efficiencies, and save public funds. The SSTAC’s input shall be considered in and made an integral part of the Commission’s annual “unmet transit needs” hearing and findings process. The composition of the SSTAC, the terms of SSTAC appointments, and precise responsibilities of the SSTAC are found in the Public Utilities Code. ⁸
Madera County Transportation Commission (MCTC)	The SSTAC serves as a citizen advisory committee to the Commission on matters related to public participation needs of Madera County residents. The SSTAC generally has two to three meetings each year. The first meeting is held in March prior to the “unmet transit needs” hearing. This initial meeting is used to familiarize the members with their role as advisers to the Commission and to select Council officers. The second meeting is scheduled to follow the “unmet transit needs” hearing to provide the Council with an opportunity to consider commentary presented at the hearing. The Council works with staff to develop recommendations for the Commission towards finding that public transportation needs that are reasonable to be met are being met. ⁹

Sources:

1. HCOAG Unmet Transit Needs Report of Findings FY 2017-18.
2. www.trpa.org/transportation/funding/sstac/
3. PCTPA Transportation Development Act Guidelines, August 2011
4. www.srta.ca.gov/161/Social-Services-Transportation-Advisory-
5. Nevada County Transportation Commission Policies and Procedures Manual, Amended July 18, 2012
6. Butte County Association of Governments Unmet Transit Needs Assessment – 2016/2017
7. <http://www.tuolumnecountytransportationcouncil.org/sstac>
8. www.actc-amador.org/sstac/
9. www.maderactc.org/sstac/

Table 2: Peer Definitions of "Unmet Transit Needs" (Page 1 of 3)

Agency	Definition of "Unmet Transit Needs"
<p>Humboldt County Association of Governments (HCAOG)</p>	<p>Unmet transit needs are, at a minimum: (1) Trips requested from residents who do not have access to public transportation, specialized transportation, or private transport services or resources for the purpose of traveling to medical care, shopping, social/recreational activities, education/training, and employment; or (2) Proposed public transportation, specialized transportation, or private transport services that are identified in the following (but is not limited to): a Transportation Development Plan, Regional Transportation Plan, Coordinated Public Transit–Human Services Transportation Plan. <i>Additionally, the HCAOG TDA Rules stipulate that, for this process, unmet transit needs do not include:</i> -Improvements funded or scheduled for implementation in the next fiscal year. -Minor operational improvements or changes such as bus stops, schedules, and minor route changes. -Trips for purposes outside of Humboldt County. -Trips for primary or secondary school transportation. -Sidewalk improvements or street and road needs. ¹</p>
<p>Butte County Association of Gov. (BCAG)</p>	<p>Unmet Transit Needs are those trips required, but currently not provided, and not scheduled to be provided within Butte County for individuals dependent on public transit to maintain a minimum standard of living. ²</p>
<p>Amador County Transportation Commission (ACTC)</p>	<p>“Unmet Transit Need” is defined as a substantial deficiency in the system of public transit services, specialized transportation services, paratransit services or private transportation services within Amador County which has been identified by community members or through the regional planning process and which has not been funded and implemented. ³</p>
<p>Tahoe Regional Planning Agency (TRPA)</p>	<p>Those public transportation improvements which have not been funded or implemented but have been identified through public input, the annual unmet transit needs hearing and transit studies in the claimant’s jurisdiction to be identified for implementation in the Regional Transportation Plan. ⁴</p>
<p><i>Sources:</i> 1. SYNOPSIS: Citizen Participation Process for Assessing Unmet Transit Needs. 2. Butte County Association of Governments Unmet Transit Needs Assessment – 2016/2017 3. Amador County Transportation Commission Final Unmet Transit Needs Findings Report, 4. Unmet Transit Needs Report, 2015-2016 Lake Tahoe, El Dorado and Placer Counties.</p>	

Table 2: Peer Definitions of "Unmet Transit Needs" (Page 2 of 3)

Agency	Definition of "Unmet Transit Needs"
Placer County Transportation Planning Agency (PCTPA)	An unmet transit need is an expressed or identified need, which is not currently being met through the existing system of public transportation services. Unmet transit needs are also those needs required to comply with the requirements of the Americans with Disabilities Act. ⁵
Shasta Regional Transportation Agency (SRTA)	<p>An "unmet transit need" under the Transportation Development Act shall be found to exist only under the following conditions:</p> <ol style="list-style-type: none"> 1. A population group in the proposed transit service area has been defined and located which has no reliable, affordable, or accessible transportation for necessary trips. The size and location of the group must be such that a service to meet their needs is feasible within the definition of "reasonable to meet" as set forth below. 2. Necessary trips are defined as those trips which are required for the maintenance of life, education, access to social service programs, health, and physical and mental well-being, including trips which serve employment purposes. 3. Unmet transit needs specifically include: <ol style="list-style-type: none"> (a) Transit or specialized transportation needs identified in the transit system's Americans with Disabilities Act Paratransit Plan or short-range Transit Plan which are not yet implemented or funded. (b) Transit or specialized transportation needs identified by the Social Services Transportation Advisory Council and confirmed by the RTPA through testimony or reports which are not yet implemented or funded. 4. Unmet transit needs specifically exclude: <ol style="list-style-type: none"> (a) Minor operational improvements or changes, involving issues such as bus stops, schedules and minor route changes. (b) Improvements funded or scheduled for implementation in the following fiscal year. (c) Trips for any purpose outside of Shasta County, in accordance with PUC Section 99220(b). (d) Primary and secondary school transportation.⁶
<p><i>Sources:</i> 5: PCTPA Transportation Development Act Guidelines, August 2011; Also FY 2011/2012 6. Shasta Regional Transportation Agency Draft 2017-2018 Transit Needs Assessment</p>	

Table 2: Peer Definitions of "Unmet Transit Needs" (Page 3 of 3)

Agency	Definition of "Unmet Transit Needs"
Lassen County Transportation Commission (LCTC)	<p>An unmet transit need is any deficiency in the system of public transit services, specialized transit/paratransit services, and private transportation services within the jurisdiction of the LCTC which has been identified by community members or through a local or regional planning process and which has not been funded and implemented. At a minimum, this may include desirers for transportation services which are identified through the annual TDA Unmet Transit Needs public hearing, by the Social Service Transportation Advisory Council, Lassen County’s Transportation Development Plan, in the Regional Transportation Plan, or in the compliance plan for the Americans with Disabilities Act as prepared by any public or private entity.</p> <p>LCTC recognizes that public transportation includes a broad range of users, uses, and destination. Although, some services may be restricted or give priority to traditionally transit-dependent populations (such as elderly, disabled, low-income, or youth), all eligible users should have equivalent access or opportunity to use the service. The transportation desire of a small group of individuals or of the clients of particular agencies, shall not, in and of themselves, be sufficient to justify a finding of unmet transit need.</p> <p>Trips that would duplicate transportation services to the general public are not considered unmet transit needs. A need for transportation service beyond the fiscal year under consideration shall not be considered to be an unmet transit need at the present time. Provision of escorts or attendants is not a transit need. ⁷</p>
San Joaquin Council of Governments (SICOG)	<p>UNMET TRANSIT NEEDS are defined as transportation services not currently provided to those residents who use or would use public transportation regularly, if available, to meet their life expectations. This includes, but is not limited to: trips for medical and dental services, shopping, employment, personal business, education, social services, and recreation. ⁸</p>
Madera County Transportation Commission	<p>“Unmet transit needs” includes all essential trip requests by transit-dependent persons for which there is no other convenient means of transportation. ⁹</p>
<p><i>Sources:</i></p> <p>7. Lassen County Transportation Commission Resolution 16-01, Adopting "Unmet Transit</p> <p>8. Analysis and Determination of Unmet Transit Needs, Fiscal Year 2015-2016, San Joaquin Council of Governments, http://www.sjcog.org/ArchiveCenter/ViewFile/Item/144</p> <p>9. Unmet Transit Needs for Madera County Notice of Findings Report - May 2016 www.maderactc.org/planning/document-library/</p>	

Table 3: Peer Counties Definition of "Reasonable to Meet" (Page 1 of 5)

Agency/Area	Definition of "Reasonable to Meet" Transit Need
<p>Humboldt County Association of Governments (HCAOG)</p>	<p>(1) Whether a need is reasonable to meet shall not be determined by comparing unmet transit needs with the need for streets and roads, or for the sole reason that there is a lack of available resources to fully meet the identified need.</p> <p>(2) New, expanded, or revised transit service that has not met performance standards in the first two full years of operation can be subject to termination as being unreasonable to meet.</p> <p>(3) The transit operator (TDA claimant) that is expected to provide a new, expanded, or revised transit service indicates that it is operationally feasible.</p> <p>(4) One and one time only, an unmet transit need may be found to be unreasonable to meet if time constraints make it infeasible to begin service within the coming fiscal year, or if more information is needed to determine whether the unmet transit need is reasonable to meet. ¹</p>
<p>Tahoe Regional Planning Agency (TRPA)</p>	<p>New, expanded, or revised transportation service to the public that offers equitable access, can be implemented within the first five-year phase of the Regional Transportation Plan, is technically feasible, would be accepted by the community, can be funded within the five-year time period and is cost-effective. ²</p>
<p>Placer County Transportation Planning Agency (PCTPA)</p>	<p>Unmet transit needs may be found to be "reasonable to meet" if all of the following conditions prevail:</p> <ol style="list-style-type: none"> 1. Service, which if implemented or funded, would result in the responsible service meeting the farebox recovery requirement specified in California Code of Regulations Sections 6633.2 and 6633.5, and Public Utilities Code 99268.2, 99268.3, 99268.4, and 99268.5. 2. Notwithstanding Criterion 1) above, an exemption to the required farebox recovery requirement is available to the claimant for extension of public transportation services, as defined by California Code of Regulations Section 6633.8, and Public Utilities Code 99268.8. 3. Service, which if implemented or funded, would not cause the responsible operator to incur expenditures in excess of the maximum amount of Local Transportation Funds, State Transit Assistance Funds, Federal Transit Administration Funds, and fare revenues and local support, as defined by Sections 6611.2 and 6611.3 of the California Administrative Code, which may be available to the claimant.
<p>Sources:</p> <ol style="list-style-type: none"> 1. SYNOPSIS: Citizen Participation Process for Assessing Unmet Transit Needs. www.hcaog.net/sites/default/files/2_utn_synopsis.pdf 2. Unmet Transit Needs Report, 2015-2016 Lake Tahoe, El Dorado and Placer Counties. 	

Table 3: Peer Counties Definition of "Reasonable to Meet" (Page 2 of 5)

Agency/Area	Definition of "Reasonable to Meet" Transit Need
PCTPA continued	<p>4. Community support exists for the public subsidy of transit services designed to address the unmet transit need, including but not limited to, support from community groups, community leaders, and community meetings reflecting a commitment to public transit.</p> <p>5. The need should be in conformance with the goals included in the Regional Transportation Plan.</p> <p>6. The need is consistent with the intent of the goals of the adopted Short Range Transit Plan for the applicable jurisdiction.³</p>
Amador County Transportation Commission (ACTC)	<p>An unmet transit need must meet ALL of the following adopted criteria in order for it to be deemed "reasonable to meet."</p> <p>-Amador Transit's overall service (including administration and overhead) must achieve 10% farebox return.</p> <p>-ACTC may allow routes to exist that provide between 6% and 10% farebox recovery ratio provided the overall system maintains a 10% farebox recovery ratio as mandated by the TDA.</p> <p>-Transit services are "capped" by the amount of available TDA (LTF and STA) funds and other grants that are available in any given year.⁴</p>
Madera County Transportation Commission (MCTC)	<p>"Reasonable to meet" shall apply to all related public or specialized transportation services that:</p> <p>(1) are feasible;</p> <p>(2) have community acceptance;</p> <p>(3) serve a significant number of the population;</p> <p>(4) are economical; and</p> <p>(5) can demonstrate cost effectiveness</p> <p>by having a ratio of fare revenues to operating cost at least equal to 10 percent, and the Commission has determined that its definition of the term "reasonable to meet" shall also apply to all service requests which do not abuse or obscure the intent of such transportation services once they are established.⁵</p>
<p>3. PCTPA Transportation Development Act Guidelines, August 2011; Also FY 2011/2012 Unmet Transit Needs Analysis & Recommendations Final Report FY 2012/2013 p.5</p> <p>4. Amador County Transportation Commission Final Unmet Transit Needs Findings Report, Fiscal Year 2016/2017</p> <p>5. Unmet Transit Needs for Madera County Notice of Findings Report - May 2016</p>	

Table 3: Peer Counties Definition of "Reasonable to Meet" (Page 3 of 5)

Agency	Definition of "Reasonable to Meet" Transit Need
Shasta Regional Transp. Agency (SRTA)	<p>1. It has been demonstrated to the satisfaction of the Agency that transit service adequate to meet the unmet need can be operated with a minimum farebox recovery of 20% in urbanized areas and 10% in non-urbanized areas. Where anticipated farebox revenue from proposed services do not meet these minimum requirements, the following exceptions may apply as determined by the SRTA Board of Directors:</p> <ul style="list-style-type: none"> (a) Transit services that are funded entirely with grants. (b) Transit services that are funded entirely by a local agency at the agency's discretion. (c) Urban transit services that represent a critical or essential service, as determined by the SRTA Board of Directors, providing such services do not result in farebox penalties for the transit system as a whole. (d) Pilot projects and new services for up to two years. (e) When a transit service primarily serves urban areas but also includes non-urban areas, a pro-rated farebox recovery standard based on the ratio of urban and non-urban in-service transit vehicle miles may be used. <p>It must also have been demonstrated that the unsubsidized portion of operating costs can be recovered by fare revenues as defined in the State Controller's Uniform System of Accounts and Records. The "Cost Allocation Method" as shown in Exhibit (A) is the method to be used for determining fare box ratio.(A) Transit service farebox recovery minimums may be determined on an individual route or service area basis.</p>
	<p>2. The proposed expenditure of Transportation Development Act funds required to support the transit service does not exceed the authorized allocation of the claimant, consistent with Public Utilities Code Sections 99230-99231.2 and TDA Regulations Sections 6649 and 6655.</p> <p>The fact that an identified need cannot fully be met based on available resources, however, shall not be the sole reason for finding that a transit need is not Reasonable to Meet.</p> <p>3. The proposed expenditure shall not be used to support or establish a service in direct competition with an existing private service, nor to provide 24-hour service.</p> <p>4. Where transit service is to be jointly funded by two or more of the local claimant jurisdictions, it shall be demonstrated to the satisfaction of the SRTA Board of Directors that the resulting inter-agency cost sharing is equitable. In determining if the required funding equity has been achieved the Commission may consider, but is not limited to considering whether or not the proposed cost sharing formula is acceptable to the affected claimants.</p> <p>5. Transit services designed or intended to address an unmet transit need shall in all cases make coordinated efforts with transit services currently provided, either publicly or privately.⁶</p>
6. Shasta Regional Transportation Agency Draft 2017-2018 Transit Needs Assessment	

Table 3: Peer Counties Definition of "Reasonable to Meet" (Page 4 of 5)

Agency/Area Definition of "Reasonable to Meet" Transit Need	
Butte County Association of Gov. (BCAG)	<p>Reasonable to meet shall include all of the following factors:</p> <ol style="list-style-type: none"> 1. Cost Effectiveness: The cost to provide the service will meet the minimum farebox recovery ratio. 2. Economy: The project can be implemented at reasonable cost. 3. Community Acceptance: Support exists, indicated through the public hearing process. 4. Operational Feasibility: The service must be safe to operate.⁷
SJCOG	<p>An unmet transit need that meets the definition above and meets all of the following criteria shall be considered reasonable to meet:</p> <ol style="list-style-type: none"> 1. Community Acceptance - There should be a demonstrated interest of citizens in the new or additional transit service (i.e. multiple comments, petitions, etc.). 2. Equity - The proposed new or additional service will benefit the general public, residents who use or would use public transportation regularly, the elderly population, and persons with disabilities. 3. Potential Ridership - The proposed transit service will maintain new service ridership performance measures, as defined by the Social Services Transportation Advisory Committee (SSTAC). 4. Cost Effectiveness - The proposed new or additional transit service will not affect the ability of the overall system to meet the applicable Transit Systems Performance Objectives or state farebox ratio requirement after exemption period, if the service is eligible for the exemption. The Transit Systems Performance Objectives are defined as 1) operating cost per revenue hour, 2) passengers per revenue hour, and 3) subsidy per passenger. If the exemption is not used, the service must meet minimum applicable Transit Systems Performance Objectives or farebox ratio return requirements as stated in the TDA statutes. Cost effectiveness is not applicable to transit services operating within an exemption period. 5. Operational Feasibility - The system can be implemented safely and in accordance with local, state, and federal laws and regulations. 6. Funding - The imposed service would not cause the claimant to incur expenses in excess of the maximum allocation of TDA funds.⁸
<p>7. Butte County Association of Governments Unmet Transit Needs Assessment – 2016/2017 8. Analysis and Determination of Unmet Transit Needs, Fiscal Year 2015-2016, San Joaquin Council of Governments</p>	

Table 3: Peer Counties Definition of "Reasonable to Meet" (Page 5 of 5)

Agency	Definition of "Reasonable to Meet" Transit Need
Lassen County Transp. Cmsn (LCTC)	<p>An identified unmet transit need can be determined to be “reasonable to meet” if it is demonstrated, based upon LCTC staff analysis or other independent evidence, that the transit need can be met within the following performance and financial standards:</p> <ul style="list-style-type: none"> -The performance standard for fixed-route systems is 10% fare revenue ratio. -All other systems shall achieve at least the fare revenue ratio and passenger productivity standards established in the Lassen County Transit Development Plan and the Regional Transportation Plan or as established by statute. -An extension of service shall not cause the system of which it is a part to fail to meet the system-wide performance standards. Considered separately, it shall achieve at least half the system-wide performance standards, except in case of an extension of service determined to be a necessary lifeline service for transit dependent populations. -The unmet transit need will not require the expenditure of more than the affected jurisdiction(s) proportional share of Transportation Development Act funds that are apportioned by LCTC on the basis of population. <p><i>The determination of whether a transit need is reasonable to meet shall also take into account as appropriate:</i></p> <ol style="list-style-type: none"> 1. Likely demand for service based on transit use rates per capita in comparable communities. 2. Whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards. 3. In the case of any new general public transit services, potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit service, if required, would impose an “undue financial burden” on the public entity. 4. In the case of a paratransit service providing complementary service to fixed-route service by a public entity, whether meeting the need would require spending a greater amount than that required by an undue financial burden waiver approved by the Federal Transit Administration under the Americans with Disabilities Act. 5. Opportunities for coordination among adjoining public entities or with private transportation provider and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary responsibilities of other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.) Duplication of other services or resources is unnecessary and not a prudent use of public funds. 6. An unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar time factors, or because additional information is needed to determine whether or not the unmet needs is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds. 7. The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet. 8. Comparing unmet transit needs with the need for streets and roads shall not make the determination of whether an unmet transit need is reasonable to meet.⁹
	<p>9. Lassen County Transportation Commission Resolution 16-01, Adopting "Unmet Transit Needs" and "Reasonable to Meet" definitions</p>

Table 4: Peer Reporting for the Unmet Transit Needs Process

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Agency	Findings, Activities and Reporting for the Unmet Transit Needs Process
<p>Humboldt County Assc. of Gov (HCAOG)</p>	<p>Creates an Unmet Needs Report</p> <ul style="list-style-type: none"> -Reports on status of prior unmet needs -Describes analysis and why need was or was not able to be met -Produces table of comments, categorized -Summarizes most frequently cited issues, responds to those oft-cited issues <p><i>HCAOG compiles public testimony and other comments from all entities, and includes it in the Unmet Transit Needs Report of Findings for the upcoming fiscal year. The report also covers demographic information of the transportation-dependent public, existing programs, and includes recommendations for meeting transit demands.</i></p>
<p>Tahoe Regional Planning Agency (TRPA)</p>	<ul style="list-style-type: none"> -TRPA continues the process of identifying unmet transit needs and forwarding the findings to the transit operators, even when all of its funding is going towards transit and therefore there is no requirement to complete the full unmet transit needs process. -Produces a full Unmet Needs Report. -Lists public comments, analyzes them, and makes a recommendation for each comment (whether it is an unmet need, whether it is reasonable to meet, etc.) -Does not make a formal finding as to whether there are unmet needs reasonable to meet, but explains in the recommendations section of each comment the timeframe for when reasonable to meet needs may be addressed.
<p>Placer County Transp Planning Agency (PCTPA)</p>	<ul style="list-style-type: none"> -Creates a report, "Unmet Transit Needs Analysis and Recommendations" -Includes an analysis of prior year unmet needs and status -Unmet needs are categorized into: ADA, Fares, New Service/Route Extensions, Other Requests, Service Area, Service Frequency, Service Schedule, Service Span. -Each public comment is addressed individually -Report includes sign-in sheets from unmet needs meetings -Report includes RTPA public hearing minutes -SSTAC minutes and comments from SSTAC members -Ridership trends -Fare revenue ratios

Table 4: Peer Reporting for the Unmet Transit Needs Process

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Agency	Findings, Activities and Reporting for the Unmet Transit Needs Process
Shasta Regional Transp Agency (SRTA)	<p>Creates an annual report, "Transit Needs Assessment" which includes:</p> <ul style="list-style-type: none"> -Description of transit providers -Transit Demand Analysis -Description of Transit-Dependent Populations, numbers, etc. -Description of Existing Transit Performance -Public Outreach <p>Addresses comments on unmet needs in a table. One column for the comment, one for "Unmet Need?", one for "Reasonable to Meet?" One for the recommendation.</p> <ul style="list-style-type: none"> -History of Unmet Needs
NCTC	Informal report to the Commissioners.
Butte County Assoc. of Gov. (BCAG)	<p>Creates a comprehensive "Transit Needs Assessment Report." It includes:</p> <ul style="list-style-type: none"> -Demographic Information -Adequacy of existing services -Community Outreach -Analysis of Comments received -Unmet Transit Needs Findings and Recommendations
Tuolumne County Transp Council (TCTC)	<p>In 2013/14 and 2014/15, Unmet Needs Report included:</p> <ul style="list-style-type: none"> -Committee Membership Rosters -System Background -Existing Transit Services -New Transit Schedule -Americans with Disabilities Act Compliance -Service Performance -Social Service Transportation Coordination -Existing Social Service Transportation -Annual Assessment -Unmet Transit Needs Definitions -Public Participation -Unmet Transit Needs Requests Received -Requests and findings for each request -Overall Finding
Lake Transit Authority (LTA)	<p>The SSTAC has considered and discussed unmet transit needs since the 1990s, just not consistent with the formal TDA process. Produces 3 page summary of unmet needs and discussion of why they are or are not reasonable to meet.</p>

Table 4: Peer Reporting for the Unmet Transit Needs Process

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Agency	Findings, Activities and Reporting for the Unmet Transit Needs Process
<p>Amador County Transp Commission (ACTC)</p>	<p>In 2016/17 created an Unmet Needs Report which included: -A timeline for the Unmet Needs Process -Background -Initiation and Methodology -Testimony -Analysis and Needs Determination Each section contains minutes from the following meetings: -ACTC -Social Service Transportation Advisory Council -Technical Advisory Committee SSTAC reviewed prior unmet needs, prioritized them, and presented priorities</p>
<p>SJCOG</p>	<p>Creates an annual Unmet Transit Needs Report</p>
<p>Madera County Transp Cmsn</p>	<p>Creates an annual Unmet Transit Needs Report which includes: -Adopted Resolution of Findings -Public Outreach noticing and proof of publication -Staff report and recommendations -SSTAC information - roles, minutes -Unmet needs public comments and response to each -Board letter of appreciation to commenters -MCTC hearing minutes, approval of findings minutes</p>

Table 5: Outreach Activities

Agency/Area	Activities / Events								
Humboldt County Association of Governments (HCAOG)	<ul style="list-style-type: none"> - Member entities conduct their own public hearings on unmet transit needs. - Accept comments year-round on unmet needs - Conducted a special survey in response to multiple requests from one community for additional service - Flyers in English and Spanish 								
Butte County Association of Gov. (BCAG)	<ul style="list-style-type: none"> - Member entities conduct their own public hearings on unmet transit needs. - Accept comments year-round on unmet needs - Comment cards on all buses - Hearing announcements placed on all buses - Hearings announced on the company website and social networking page, and emailed to community social service agencies 								
Shasta Regional Transportation Agency	<ul style="list-style-type: none"> - Shasta Transit brainstorm, which includes: <table border="0" style="margin-left: 20px; width: 80%;"> <tr> <td>Telephone</td> <td>SRTA website</td> </tr> <tr> <td>Email</td> <td>Social Media (videos)</td> </tr> <tr> <td>Meeting in person</td> <td>Television</td> </tr> <tr> <td>Traditional mail</td> <td>Distribution</td> </tr> </table> - Flyers & posters on buses - The Shasta Transit Priorities Survey was an online survey to allow the public to prioritize the most popular transit service requests in the Shasta Region. It was advertised on Facebook, Twitter, and social service agencies were notified in an effort to reach their clients. Survey respondents were asked to rank their top five of 13 unmet transit need improvement requests generated through the Shasta Transit Brainstorm. 	Telephone	SRTA website	Email	Social Media (videos)	Meeting in person	Television	Traditional mail	Distribution
Telephone	SRTA website								
Email	Social Media (videos)								
Meeting in person	Television								
Traditional mail	Distribution								
Tuolumne County Transportation Council (TCTC)	<ul style="list-style-type: none"> - Public Notice in the local newspaper. - Public service announcements on the local radio stations. - Postings on Tuolumne County transit buses. - Public participation booth at the Health Fair. 								