

Humboldt County Social Services Transportation Advisory Council

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Prepared for
Humboldt County Association of Governments

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Social Services Transportation Advisory Council

Strategic Plan

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INTRODUCTION

The Humboldt County Association of Governments (HCAOG) serves as the Regional Transportation Planning Agency (RTPA) for Humboldt County. One of the many responsibilities of the RTPA is to oversee the allocation of Transportation Development Act (TDA) funds which support public transportation. For this process, each RTPA establishes a Social Services Transportation Advisory Council (SSTAC). The primary role of the SSTAC is to lead and participate in the RTPA's annual "Unmet Transit Needs" (UTN) process, identifying transit needs that may be reasonable to meet. The TDA law requires this process for all funding recipients who do not use the entirety of their funding-allocation for the purposes of transit (or non-transit uses such as administration or bicycle or pedestrian uses, as applicable). While there are specific guidelines for conducting the UTN process, there is also much leeway in how each RTPA and SSTAC interprets the guidelines.

The HCAOG has retained the services of LSC Transportation Consultants to develop a Social Services Transportation Advisory Council (SSTAC) Strategic Plan. The purpose of this plan is to clarify the role of the SSTAC, review recent UTN findings, identify goals and objectives for the SSTAC, and provide a strategy to make the UTN process as clear and efficient as possible. The final chapter of this Strategic Plan has also been incorporated into the concurrently developed Humboldt County Transportation Development Plan (TDP).

SOCIAL SERVICES TRANSPORTATION ADVISORY COUNCIL

The SSTAC is an advisory body, established through the Transportation Development Act, which acts as a conduit at the regional/local level to facilitate actions that can result in funding and support for coordination and consolidation of social service transportation. The extent of its role is in large part up to the discretion of the Regional Transportation Planning Agency (HCAOG, in this case). A review of peer RTPAs has shown that an SSTAC's role can be limited to an advisory council for the UTN process, or that it can act as a de facto planning board for additional activities such as oversight of a TDP or as an outreach committee. In Humboldt County, per the HCAOG website, the SSTAC is defined as follows:

"The role of the Social Services Transportation Advisory Council (SSTAC) is to lead and participate in the RTPA's annual "unmet transit needs" process, identifying transit needs that may be reasonable to meet. The SSTAC shall also review the Association's findings each year, recommending action as appropriate. They advise HCAOG on other issues concerning coordinating and consolidating specialized programs. The Council consists of social service transportation providers, users, and administrative agencies representing the elderly, disabled, and economically disadvantaged citizens of Humboldt County."

The SSTAC role in Humboldt County is particularly active, with the SSTAC serving as a deliberative body making well considered recommendations to the HCAOG Board. The SSTAC is also a strong collaborator in how their role is defined within the county.

SSTAC Members and Meetings

The SSTAC in Humboldt County is composed of social service transportation providers, transit users, and administrative agencies representing the elderly, disabled and economically disadvantaged residents of Humboldt County. Membership, per statutory requirement, includes:

- One (1) representative of potential transit users who is 60 years or older
- One (1) representative of potential transit users who is handicapped
- Two (2) representatives of the local social service providers for seniors, including one representative of a social service transportation provider, if one exists
- Two (2) representatives of local social service providers for the handicapped, including one representative of a social service transportation provider, if one exists
- One (1) representative of a local social service provider for persons of limited means
- Two (2) representatives from the local consolidated transportation service agency (CTSA)
- Additional members may be appointed by the transportation-planning agency

This broad membership is intended to ensure that the transit-dependent population is represented and has a conduit for expressing needs and ideas in regards to provision of transit services. Members serve from one- to three-year terms, and may serve renewed terms. As a result, membership typically includes inexperienced participants as well as those well-versed in the process. Members of the SSTAC need not be transit users, but they should understand what services are available to the public in order that they may best represent the needs of their constituents.

The Humboldt County SSTAC meets the first Wednesday of each quarter. Additionally, the SSTAC meets for special meetings as requested, such as during the development of this Strategic Plan.

SSTAC Issues

An important part of this strategic plan was to identify issues which SSTAC members face in their role on the Council. LSC conducted workshops with the SSTAC and interviews with stakeholders. Below is a list of the predominant concerns expressed through this outreach.

1. The definitions for “unmet transit needs” and “reasonable to meet” seem unclear and sometimes contradictory. Better definitions are needed for multiple key terms in the UTN process.

2. Extensive public outreach is conducted for the UTN process, which the SSTAC supports in order that all who wish to express transit needs may do so. However, this leads to several concerns:
 - a. The public sometimes overstates their need for services, possibly in hopes that service will be implemented, or possibly because they believe they will use a service that in fact they may not use. The SSTAC needs a methodology for understanding requests and accurately quantifying the impact of the requests.
 - b. The public may be under the impression that identifying a need will lead to implementing service or operational changes. It is frustrating to the public when they submit a need which is not acted upon. Clarification of what they can expect from the process may be helpful.
 - c. Impromptu surveys and questionnaires have been designed to provide feedback on transit needs. Poorly designed outreach materials can lead to the designer feeling frustrated that their instrument did not produce action, and the SSTAC may feel frustrated when open-ended questionnaires do not provide enough information to effectively act on a request.
3. Once UTNs have been identified, the SSTAC is not always clear whether they are or are not “reasonable to meet.”
4. A process is needed for prioritizing UTNs that are found to be “reasonable to meet.”

These issues are addressed as part of this Strategic Plan.

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INTRODUCTION

As guidance for this Plan, a peer review was conducted of the unmet transit needs process in similar rural California counties. The SSTACs and UTN processes selected for the peer review either had similar geography and/or demographics to Humboldt, similar transit systems, or simply offered valuable lessons from the way they conduct their hearings.

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 chapter show the myriad approaches to the UTN process. The peer review is included in this Strategic Plan so that the Humboldt County SSTAC may consider how other entities have addressed the same issues which it faces.

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 in Appendix A. 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 identifying 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; provide 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 well considered recommendations to the HCAOG Board. Many of the other SSTACs simply summarize comments from hearings.

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 in Appendix A 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 the transit-dependent population.

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 in Appendix A 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 agencies generally have definitions which 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 in Appendix A 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 in Appendix A 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 are shown in Appendix B, and 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> .

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Unmet Transit Needs: Definitions and Policies

BACKGROUND

The Transportation Development Act (TDA) provides two major sources of funding for public transportation: the Local Transportation Fund (LTF) and the State Transit Assistance (STA) fund. These funds are for the development and support of public transportation needs that exist in California and are allocated to areas of each county based on population, taxable sales and transit performance. Some counties have the option of using LTF for local streets and roads projects, if they can show there are no unmet transit needs that are reasonable to meet. Humboldt County is among those jurisdictions which use a portion of its LTF for streets and roads, and therefore is subject to assessing unmet transit needs. Furthermore, a number of RTPAs have found the UTN process helpful in identifying and prioritizing needs even if all of their LTF funds are spent on transit, administrative or bicycle/pedestrian functions. These RTPAs have continued the process, albeit often simplified, because they find it a useful process for determining the best use of public transit funds.

UNMET TRANSIT NEEDS PROCESS

Each year, HCAOG conducts a citizen participation process to receive public comment concerning transit needs within the RTPA jurisdiction. The HCAOG Social Services Transportation Advisory Council (SSTAC) leads the process to solicit broad input from transportation-dependent and transportation-disadvantaged persons. With recommendations from the SSTAC, at the end of the process the Board shall find that:

- (a) there are no unmet transit needs; or
- (b) there are no unmet transit needs which are reasonable to meet; or
- (c) there are unmet transit needs, including those that are reasonable to meet. (Section 99401.5)

The HCAOG Board makes this finding as a result of testimony received and based on HCAOG's adopted definitions (as discussed below). If the HCAOG Board finds that there are no unmet transit needs, or that there are no unmet transit needs which are reasonable to meet, entities may expend excess (unexpended) TDA funds for non-transit purposes within guidelines. On the other hand, a finding that there are unmet transit needs, including those that are reasonable to meet, triggers the requirement that the respective entity set aside funds, given that they are available, to implement a program (or service) to meet those needs deemed reasonable to meet. This is, however, a nuanced process: it is not always a simple task to determine "unmet needs" or what is "reasonable to meet." Additionally, the process of setting aside funds requires a determination of whether the program or service is financially sustainable. If the TDA funds are not sufficient (alone or in combination with other sources) to sustainably fund the transit expansion, funds may be available for non-transit purposes.

Review of Definitions

An important piece of this SSTAC Strategic Plan is reviewing and clarifying definitions used in the UTN process. The TDA intentionally provides leeway in how specific terms are identified, and in fact, instructs the RTPA to adopt definitions of “unmet transit needs” and “reasonable to meet.”

The definitions developed for the UTN process do, in fact, carry value judgements of the local entity, and therefore are instrumental in creating policy. It is appropriate that the definitions should be scrutinized every few years at a minimum to determine if they continue to reflect the values of the local communities. Below is a discussion of current definitions and recommendations for further clarification or revision.

Definition of “Unmet Transit Need”

The HCAOG adopted the following definition of “Unmet Transit Needs”:

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.*

Additionally, the HCAOG TDA Rules stipulate that, for this process, unmet transit needs do not include the following:

- 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.*

Analysis

The definition of what does and does not constitute “unmet transit needs” is fairly straightforward. However, in discussing this definition with the SSTAC members, two portions of the definition warrant review—“minor operational improvements” and “trips for purposes outside of Humboldt County.” In the first case, “minor operational improvements” needs to be

further defined, and in the second case, a policy decision is needed in regards to whether it is appropriate to consider out-of-county trips as not being an unmet need¹.

Minor Operational Improvements

When reviewing comments from the public in the unmet transit needs process, SSTAC members are sometimes unclear as to what constitutes a “minor operational improvement” versus an “unmet transit need.” While the language points out examples of “bus stops, schedules, and minor route changes,” this still leaves room for interpretation. What if a bus stop is requested a quarter mile from an existing route? A mile? When does a minor change become significant enough to qualify as an “unmet transit need”?

Recommendation

In answer, a request can be considered an unmet need if it affects the operating cost of the transit service, either by requiring additional staff and/or additional vehicle hours of service or miles of service. As most of the costs associated with transit service are tied to the hours of service (such as driver wages) rather than the miles of service, the cost implications are minimal for service modifications that change miles but not hours of service.

Definition of “Reasonable to Meet”

The HCAOG has identified the following criteria in determining “Reasonable to Meet” transit needs:

Unmet transit needs may be found to be reasonable to meet by means of the following criteria:

- (1) Pursuant to the requirements of Transportation Development Act (TDA) Statutes (Public Utilities Code Section 99401.5 (c)), a determination of needs that are reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads, for the allocation of TDA funds. The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for finding that a transit need is not reasonable to meet.*
- (2) If a new, expanded or revised transit service fails to meet ridership or cost effectiveness standards after one full year of operation, reasonable efforts will be made and documented to rectify the situation during the following year of operation. If service has not met performance standards during the period required by the Transportation Development Act Statutes, and efforts to improve service productivity have been documented by the operator to be unsuccessful, the service will be subject*

¹ The policy discussion is included below, and it was decided that “trips for purposes outside of Humboldt County” would be dropped from the exclusions.

to termination as not being reasonable to meet. Efforts to rectify the underperforming ridership may include but are not limited to increased outreach/marketing of service (newspaper placement), collaboration between organizations or agencies that work with potential ridership of the service and surveys documenting ways in which the service could be improved or made more attractive.

(3) Evaluation of potential unmet needs shall be conducted by the TDA claimant² that is expected to provide the new, expanded, or revised transit service. The TDA claimant shall review, evaluate, and indicate that the service is operationally feasible, including:

- a. Forecast of anticipated ridership if service is provided.*
- b. Estimate of capital and operating cost for the provision of such services.*
- c. Determination if there are adequate roadways and selected turnouts to safely accommodate transit vehicles.*
- d. Determination that vehicles are currently available in the marketplace.*
- e. Determination if potential transit service duplicates existing services.*

(4) An unmet transit need, meeting the tests in criteria #3, may be determined not reasonable to meet only once based on an inability to initiate service within the coming fiscal year. The claimant(s) should use this time to plan, acquire vehicles, or submit additional information needed to begin service. If the service is not initiated in the next fiscal year and still meets the tests in criteria #3, it will be determined reasonable to meet.

Analysis

The first portion of criteria (1) is a clear and direct response to the TDA's requirement that funds not be expended on streets and roads without first meeting unmet transit needs that are deemed reasonable to meet. However, the second portion of the criteria which states "*The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for finding that a transit need is not reasonable to meet*" is problematic because it seems counter-intuitive. If a transit need cannot be fully met with available resources, why would that not, on its own, be reason enough to identify it as "not reasonable to meet"? The answer, in short, is that should funding become available, that need should be further considered. This insures that jurisdictions do not simply dismiss an identified need just because funding is not available. It would be identified as an unmet need that is reasonable to meet, but which remains unfunded.

The second criteria (2) speaks to whether a service is sustainable once it is (presumably) found "reasonable to meet" and is implemented, with the metric being "ridership or cost effectiveness standards." The criterion does not identify what the standards are or where they

² For clarification, this is the responsibility of HCAOG as the RTPA, not the specific transit providers.

can be found. The criterion also states that if these standards are not met during the “period required by the Transportation Development Act Statutes,” efforts shall be undertaken to rectify the situation. However, no statute within the TDA requires that a poorly performing service be continued.

The third criteria (3) is reasonable as stated.

The wording for criteria (4) is confusing, but seems to be in place to ensure that just because an identified need cannot feasibly be met in the current fiscal year, this does not mean that it should be discounted as “not reasonable to meet.”

Recommendation on definition of “Reasonable to Meet”

The HCAOG criteria for determining what constitutes a “Reasonable to Meet” transit need are generally sound, but need clarification. Below is a suggested revision of the language.

Unmet transit needs may be found to be reasonable to meet by means of the following criteria:

- (1) To be considered reasonable to meet, a service must be operationally feasible and financially sustainable, as defined below:
 - a. To be considered operationally feasible, the service must have adequate running time, adequate roadways, and must be safe to operate.
 - b. To be considered financially sustainable, enough money should be available from identified sources of funding to pay for the marginal operating cost of the service continuously for three years.

- (2) Additionally, to be considered “reasonable to meet” the service must be projected to meet a minimum “marginal farebox return ratio”³ of 10 percent within two years. If multiple competing services are requested, other factors such as estimated subsidy per passenger trip and passengers per vehicle hour of service may also be considered. Ridership and farebox return ratio thresholds will also be considered for continuing newly-introduced services.⁴

- (3) Pursuant to the requirements of Transportation Development Act (TDA) Statutes (Public Utilities Code Section 99401.5 (c)), a determination of needs that are reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads, for the allocation of TDA funds.

³ The marginal farebox return ratio is determined by dividing the marginal fare revenue (that fare revenue collected specifically for the new service) by the marginal operating cost (the operating cost of the additionally provided service).

⁴ Thresholds for services introduced as a means of meeting UTNs are discussed in the Policy Discussion of this Strategic Plan.

- (4) Once a service is determined to be “reasonable to meet” and is implemented, it can be expected that the ridership in the first 1-2 years of the new service will be less than the projected optimal ridership. Ridership should be evaluated at 6-month intervals to determine if service is meeting performance standards adopted by the transit provider, and specifically, whether the service meets a minimum 10 percent marginal farebox ratio. If the service is being adequately promoted and fails to be within 60 percent of the identified standards after six months, 90 percent within the first year, or 100 percent within two years, the service may be cancelled and deemed “no longer reasonable to meet.” An exception to this rule is when a community or group is willing to participate in sharing the ongoing cost of the new service.

POLICY REVIEW

In developing this Strategic Plan, the SSTAC reviewed current policies which guide decisions and actions for the UTN process. To help address some of the issues identified in the plan process, the SSTAC recommends revising policies as discussed below.

Policy Option: Should Service Outside Humboldt County Be Considered a Potential Unmet Need?

The current language in the UTN process states that “*trip purposes outside of Humboldt County*” are specifically excluded from the definition of “unmet transit needs.” The SSTAC debated this policy.

While some jurisdictions feel that funding trips beyond their borders is not the best use of public dollars, others have determined that such service does address residents’ needs and warrants investment. This is typically the case where some services (such as medical) cannot be met within a county, or where a portion of the county is closer to services beyond the county borders than within the county. Due to long travel distances, out-of-county trips would be relatively costly in terms of subsidy required per passenger-trip. As many of the jurisdictions (notably Humboldt County) already expend all of their available TDA funds on transit services, funding out-of-county services could well reduce funding available for other unmet needs within Humboldt County, and could result in a reduction in overall trips provided.

Pros and cons of the excluding “out-of-county trips” are discussed below.

Pros of excluding “out-of-county trips” from “unmet needs”

- Reserving funds for in-County service helps prioritize limited funding.
- Can be politically popular to limit public funds intended for the County to be spent 100 percent within the County.

- Providing funds only for in-county services ensures that transportation dollars are spent for accessing goods and services in the County, perhaps keeping more dollars in-county.
- Simplifies controlling costs by reducing number of options which need to be considered.

Cons of excluding “out-of-county trips” from “unmet needs”

- Can ignore residents’ real needs for access to services outside of the County, particularly medical services.
- Not meeting inter-county needs can impede overall mobility of residents.
- Existing options for public transportation out of the county (via Greyhound and Amtrak Thruway) are limited in schedule and expensive for the passenger. Amtrak also requires purchase of a train ticket in addition to the bus fare.

Discussion

The SSTAC noted that Greyhound already provides some out-of-county service, and as a recipient of FTA 5311f funds for this service, it could be considered incumbent upon them to provide additional service if needs are expressed. For example, adding Greyhound stops in Laytonville could address some needs expressed in previous UTN hearings. However, the SSTAC determined it would be difficult to put much pressure on Greyhound to meet local needs, and they noted that infrastructure requirements for Greyhound stops can be extensive.

It was also noted that the US Department of Veterans Affairs’ Program for All Inclusive Care for the Elderly (PACE) and other local volunteer or not-for-profit entities provide a lot of transportation, and that an inventory⁵ of such service should be looked at in terms of identifying need. For example, it was suggested there could be better coordination among current providers. It was also noted that the varying funding restrictions and eligibility requirements of agencies with different mandates can make coordination difficult.

What this discussion emphasized and concluded is that in determining if a need is unmet, the existing resources beyond the public transit system need to be considered as well. However, these factors do not affect the decision to consider the language for exclusion. Ultimately, the goal of public transit is to meet the mobility needs of the residents (and visitors) of the County, and given the increasing demand for services beyond the county lines, the SSTAC determined this exclusion should be removed.

⁵ An inventory of transportation services is cursorily provided in the Humboldt County TDP (LSC, 2017), and a detailed inventory is provided in the *Humboldt County Coordinated Public Transit – Human Services Transportation Plan* (Nelson Nygaard, 2008) and the *Coordinated Public Transit – Human Services Transportation Plan* (HCAOG, 2013—amended 2016).

ACTION: Upon review of the options, the SSTAC decided to remove the exclusion and determine out-of-county trips as “reasonable to meet” on an equal footing with other identified, in-county requests.

Policy Option: Establish Goals and Policies for SSTAC That Reflect the Council’s Values

At present, the SSTAC does not have any established goals or policies. Establishing goals and policies may help guide future discussions, particularly with regard to prioritizing between competing unmet transit needs that are reasonable to meet.

One source of policy discussion is found in the current *Regional Transportation Plan (VROOM ... Variety in Rural Options in Mobility)* which contains the following policy statements regarding the scope of public transit services:

“GOAL: Achieve an integrated and sustainable multimodal transportation system that provides public transportation options for all users traveling in Humboldt County. Transit and paratransit users have options for affordable, reliable and efficient transit service that effectively meets their local and regional mobility needs.

Specific Public Transportation Objective: Expand and improve local and interregional transit services to improve mobility for people in Humboldt County.

Policy PT-1: To grow and meet transit demand, fund programs to increase trip frequency. Prioritize programs with the highest potential to increase ridership and reduce the number of single occupancy vehicle trips made in Humboldt County.

Policy PT-7: HCAOG shall evaluate and consider requests for extending service hours, expanding service area, and adding service frequency, based on the potential of the new service(s) to achieve minimum productivity standards.”

ACTION: The SSTAC reviewed these statements and found them to be representative of the SSTAC’s vision for public transit service in Humboldt County and recommended adopting them as SSTAC goals.

Policy Option: Prioritizing New Service Requests

When there are more than one unmet needs deemed reasonable to meet and available funds are limited, the SSTAC then has the responsibility of prioritizing recommendations. This is when the values of the SSTAC come to bear. To the degree possible, prioritizing service requests should be a quantitative process, including the numerical evaluation of ridership, costs and performance measures. In particular, the required subsidy-per-passenger-trip is an important

measure to consider, in that it relates the key desired output of a transit program (serving new trips) with the key public input (subsidy funding). A good starting point for a setting priorities is therefore to first prioritize those with a lower subsidy per passenger-trip⁶. This performance measure identifies those service improvements that provide the greatest “bang for the buck”. It would be the role of HCAOG staff, with input as appropriate from the transit service providers, to prepare this quantitative analysis.

There are other factors, however, that could be considered and which are more qualitative in nature, such as the relative level of importance that service has in the quality of life for specific groups. For instance, it may be considered more important to provide at least some limited service to an outlying community (to provide access to shopping, medical and other basic needs) rather than providing an incremental improvement to a community that is already well-served (such as providing 10-minute service frequency rather than 15-minute service frequency). It also might be considered to be more important to serve a passenger traveling a longer distance (perhaps from a community lacking essential services) than to serve someone making a short trip in a more urban area, though the first instance would result in a higher subsidy per passenger trip.

The crux of the problem is that serving less-concentrated areas (and lower demand periods of the day or week) results in a less efficient use of available TDA funds. For example, reviewing the existing services (Table 21 of *Technical Memorandum One*), the Southern Humboldt Intercity service requires \$14.43 in subsidy funding to serve one passenger-trip, while the Eureka Transit System requires only \$2.51. In other words, five to six passengers can be served on the Eureka Transit System for every one passenger that can be served on Southern Humboldt Intercity service. This is made even more challenging by the fact that many of the individual jurisdictions use all available TDA funding for transit ... so any decision to fund one service requires reducing funding for another.

Weighing the various quantitative and qualitative factors is exactly the role of the SSTAC, and why the TDA identified the need for a SSTAC in each county. While the numbers can help guide the decision process, in the end the prioritization of transit improvements needs to reflect a community’s values. There will never be a formula that can “automatically” perfectly prioritize transit options.

Discussion

The SSTAC discussed the difficulty of prioritizing service requests, as this is the crux of the issue and a main impetus for this study. In particular, members have expressed frustration at responding to requests for service by implementing new services to meet the reported need,

⁶ Other measures, such as farebox return ratio, could alternatively be used, in which case the option with the higher value would be prioritized. However, it is possible for a transit service with a relatively high (good) farebox return ratio to also have a relatively high (poor) subsidy per passenger-trip, if fares are relatively high (such as for a long-distance service).

only to find the ridership never materialized. The issue is two-pronged, however. First, a better process is needed to determine if needs are truly “reasonable to meet” and secondly, competing needs need to be evaluated against one another to determine priorities.

ACTION: First, the SSTAC will use steps outlined in this Strategic Plan to verify claims of unmet need (see “Verifying Claims of Unmet Need” in the next Chapter). The SSTAC will also use the clarified definitions in this Plan to better evaluate whether service requests are reasonable to meet, and will apply service standards to determine such. In particular, the new service will need to have a projected farebox ratio of 10 percent or better (based upon realistic analyses of potential ridership and costs).

In comparing the new service against other newly requested and existing services to determine which services as a whole will be funded, the SSTAC will use additional service standards (calculated by HCAOG with the assistance of operators) to formulate a service comparison. The SSTAC will then deliberate to recommend whether a service (1) meets the definition of “reasonable to meet” and (2) is prioritized for limited available funding.

Steps for a Successful Unmet Transit Needs Process

This Plan is a culmination of SSTAC Strategic Plan meetings and findings, as discussed in previous chapters of this report. This chapter summarizes recommended strategies for conducting a streamlined, straight-forward UTN process to best serve HCAOG and the public. This final chapter shall act as a guidebook to planners and SSTAC members in conducting the UTN process.

Adopt Mission Statement, Policies and Definitions

Chapter 2 reviewed goals, policies and definitions related to the role of the SSTAC and the UTN process. It is recommended these be formally adopted, along with a mission statement which states:

“The Mission of the Humboldt County Social Services Transportation Council shall be to provide support and guidance to the Humboldt County Association of Governments, particularly in relation to leading and participating in the annual “unmet transit needs” process. The SSTAC will champion the transportation disadvantaged residents of the County in helping them to identify unmet transit needs and will facilitate action to meet reasonable transit needs.”

Identify Participants’ Roles

It is important for all of the participants in the UTN process to understand their roles. Below is an overview of the primary role and responsibilities of the Regional Transportation Planning Agency (RTPA), SSTAC and providers in the UTN process.

Role and Responsibility of the RTPA

The HCAOG (as the designated RTPA) has the primary role in conducting the UTN process. Responsibilities include:

- Oversee UTN process, including initial planning and outreach in coordination with the SSTAC
- Facilitating and summarizing public input

- Identifying potential Unmet Transit Needs versus operational improvements, and forwarding the suggestions for operational improvements to the transit operator for their consideration
- Analyze UTN requests, including assessments of potential ridership and cost, capital and operational implications (with input from transit operators) and provide this information to the SSTAC to inform their decision-making

Role and Responsibility of Transit Operators

- Adopt performance standards
- Provide data to measure performance
- Provide input to the RTPA regarding the potential impacts of addressing unmet transit needs.

Role and Responsibility of the SSTAC

- Lead and participate in UTN process
- Review requests and suggestions for service improvements and, applying definitions, determine if requests are “unmet transit needs” and if so, determine if they are “reasonable to meet.”
- Provide recommendations to the HCAOG Board regarding Unmet Transit Needs

Adopt Performance Standards

The transit providers in Humboldt County are strongly encouraged to adopt performance standards which reflect their level of service, funding and operating characteristics, as identified in the current Transportation Development Plan. While this is an iterative and evolving process, having standards in place facilitates HCAOG’s ability to evaluate the feasibility of a transit request and to prioritize transit needs.

At a minimum, the SSTAC and HCAOG staff will consider the farebox return ratio of a recommended service. Other helpful standards and the metrics of performance include:

- **Service Effectiveness Standards:** measured in passengers carried per service hour.
- **Service Efficiency Standards:** in addition to farebox return ratio, also the subsidy spent per passenger trip.

The farebox return ratio in particular should be used to determine if a service suggestion is “reasonable to meet” while the remaining standards can be helpful in prioritizing prospective services.

When evaluating impacts of a newly conceived service, the marginal costs should be considered, which equal the costs added to existing costs, and do not include, for example, administrative and fixed costs that the program would incur regardless of the new service. Likewise, the ridership and fare revenue which would be generated would be used to determine the marginal subsidy per passenger trip.

While the quantitative measures are an important evaluation tool and should provide the first approach in determining needs, qualitative factors, such as providing coverage to under-served or severely mobility-limited populations may be considered as well. There is no simple formula for determining which transit needs are reasonable to meet.

UTN PROCESS

Below is a recap of the UTN process and strategies to improve the process in Humboldt County.

Timeline

The UTN process is an annual one, so it is important to provide and maintain a calendar of key events and activities which occur for the process. Borrowing from the comprehensive and easy-to-read graphic in Shasta County, a timeline has been developed for Humboldt County as shown in Figure 1, below.

Highlighted activities in the calendar include the following:

Phase 1: August to October

1. Transit Needs Assessment: The SSTAC and HCAOG staff brainstorm and/or identify:
 - A review of findings from the previous year’s UTN process
 - Best methods of outreach for the current year
 - Trends or activities in social services, economics, transit operations or otherwise which might affect the UTN process
 - Confirm schedule and calendar of public hearings

2. Public Outreach
 - Flyers/posters soliciting input
 - Website announcements soliciting input and describing process and opportunities for input
 - New methods of outreach identified in Step 1 (above) as appropriate
 - Public notice of hearings

- Conduct hearings
- Receive written, telephone and public hearing comments

Phase 2: October to March

1. SSTAC reviews comments, identifies “unmet” versus “operational” requests – reports to HCAOG (see flow chart, Figure 2)
2. HCAOG submits requests deemed “operational” to providers; confers with providers to determine feasibility of meeting unmet transit needs
3. HCAOG conducts analysis to determine “reasonable to meet”—presents to SSTAC
4. SSTAC makes recommendations on findings
5. Public reviews and responds to findings
6. HCAOG prepares report of UTN

Phase 3: March

1. HCAOG Board reviews and adopts UTN findings
2. HCAOG adopts TDA budget

EFFECTIVE OUTREACH

A critical element of the UTN process is, of course, public outreach. The minimum required outreach per TDA law is to conduct one annual hearing in the jurisdiction which does not expend all TDA funds on transit. Many TDA recipients go above and beyond this required minimum, including Humboldt County.

Humboldt County Outreach Efforts

In Humboldt County the minimum requirement would be to conduct one hearing in the County seat (Eureka). However, to effectively garner input from the potentially transportation-disadvantaged throughout the county, HCAOG chooses to conduct hearings in multiple locations at multiple times. For example, public hearings were held in October and November, 2016, by the following entities for the 2017-18 UTN Process:

- | | |
|---------------------------------------|--|
| – City of Arcata | – McKinleyville Municipal Advisory Committee |
| – City of Blue Lake | – Manila Community District |
| – City of Eureka | – City of Rio Dell |
| – City of Fortuna | – City of Trinidad |
| – HCAOG (two meetings held in Eureka) | – City of Ferndale |

Figure 1:
Overview of UTN Timeline

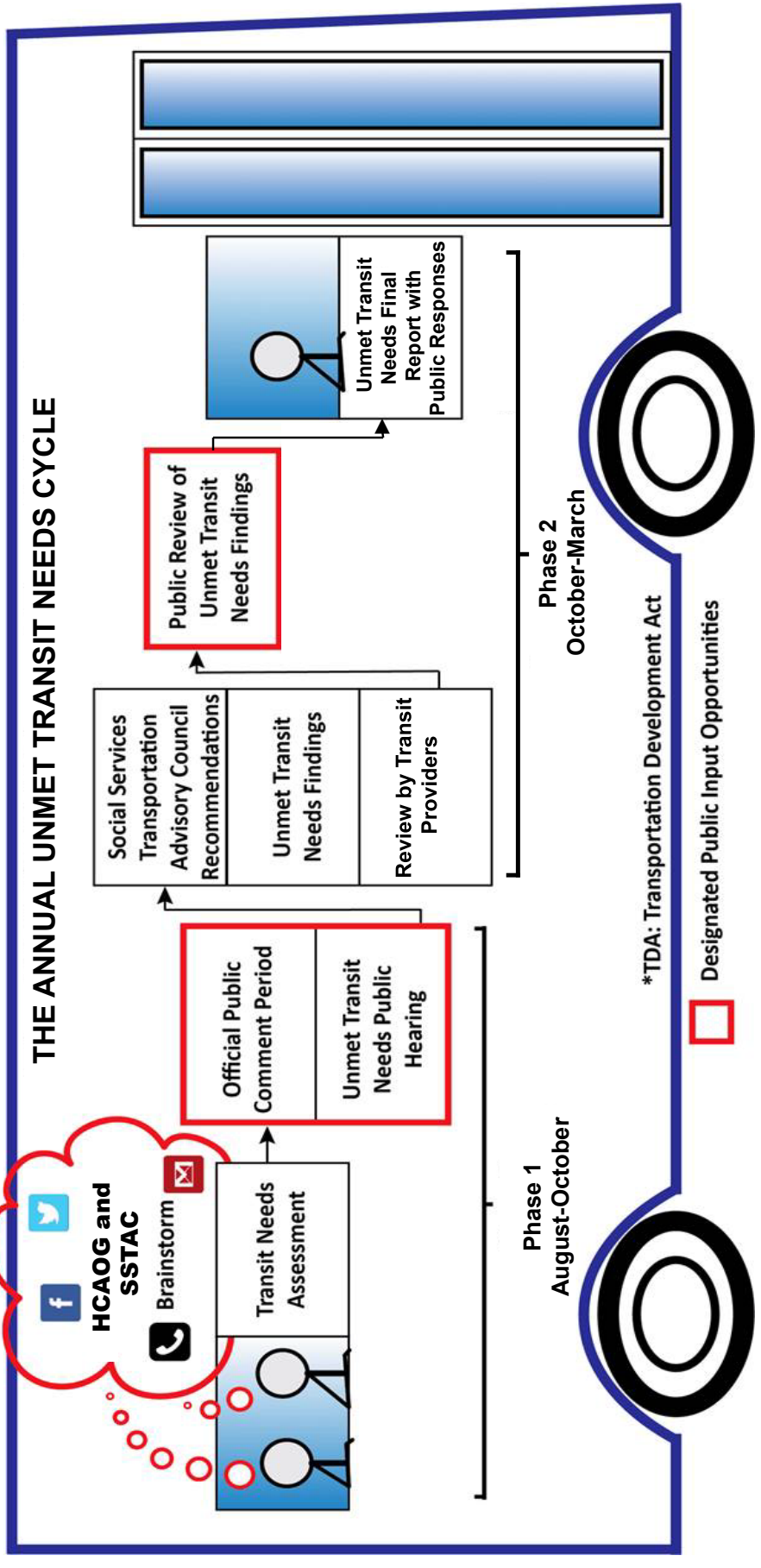
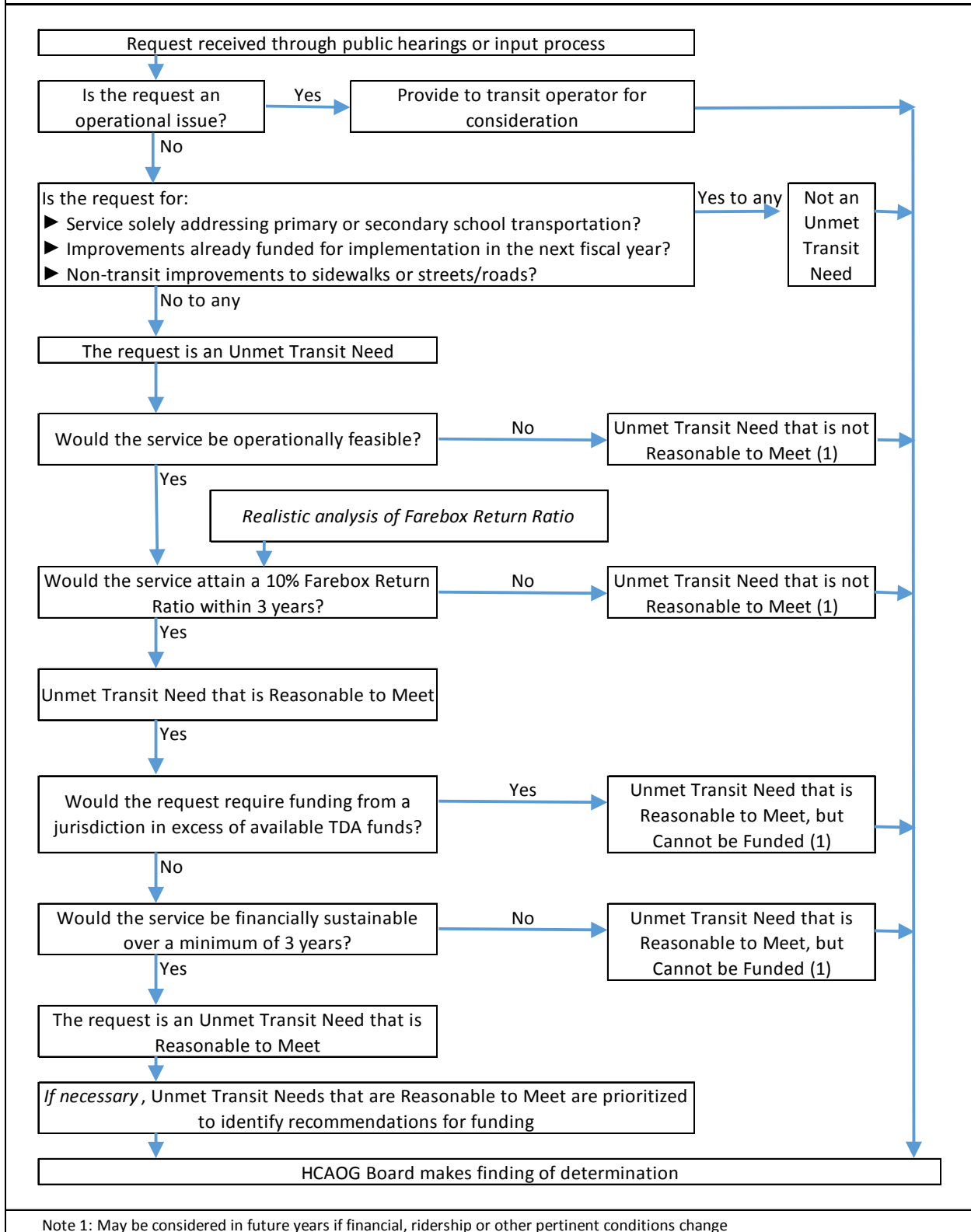


Figure 2: HCAOG Unmet Needs Process Flowchart



A flyer for the hearings was widely distributed and posted on buses. The flyer is printed in English and Spanish. The hearings were held by city staff, municipal staff, or HCAOG staff, sometimes as a portion of a regularly scheduled City Council meeting. Results were submitted to HCAOG within a month following the hearings, along with any additional phone or written comments received. The UTN report for 2017-18 was adopted in March, 2017.

This level of outreach goes above and beyond what is required, but is effective in ensuring that residents from all portions of Humboldt County have an opportunity to provide input.

Humboldt County Surveys and Other Outreach

In addition to the planned and advertised public hearings on UTN, other outreach activities have been conducted in recent years, including:

- A “Focus Survey” conducted by the SSTAC and staff in 2015 to determine transit needs in the Fieldbrook, Glendale and McKinleyville area. The need was reported the previous year, and the survey was follow-up. The survey was sent to 2,230 residents in an approximate one mile radius of Fieldbrook Road, Glendale Avenue, the City of Blue Lake, Korbekel, and Murray Road to Central Avenue in McKinleyville. The survey was available in English and Spanish and available electronically on HCAOG’s website. A total of 123 responses were received.
- The Associated Students of the College of the Redwoods (ASCR) led a survey to identify student weekend transit needs in 2016. The student senator who led the process communicated with HCAOG in planning the surveys. The survey was made available to students living in the school dorms, and students taking Saturday classes. A total of 80 individuals completed the survey.
- A letter with supporting signatures was submitted from the Peninsula Community Collaborative regarding unmet transit needs on the Samoa Peninsula. The October 2016 letter included six signatures.

Coordinated efforts to solicit UTNs can be productive, particularly if the identified needs are clear. However, claiming a need for transit service without any specifics can be counterproductive (see the discussion below on “verifying transit needs”)

HCAOG Website Materials Relating to UTN

The HCAOG website includes a link to each of its committees. The SSTAC link describes the role of the SSTAC and lists committee members, and provides a link to the meeting schedule, agendas, meeting records and SSTAC bylaws. (It would be helpful if the “unmet transit needs” mentioned in the first sentence on the page could be linked to the UTN page). A separate link posted under “Projects” has a brief description of the Unmet Transit Needs, and provides links

to a detailed description of the UTN process and to the last two adopted “UTN Reports of Findings.” The description of the UTN process provides a good synopsis, but a simpler format might work better for the average lay person wanting to know how input will be processed. Appendix D presents materials developed by LSC for posting on the HCAOG website regarding the unmet transit needs process which might be a suitable supplement to link on the SSTAC page.

Verifying Claims of Unmet Needs

Tips for Projecting Transit Ridership

Evaluating requests received through the UTN process requires forecasting the ridership (and in turn the farebox revenue) that would result from the proposed service. The field of transit ridership forecasting is quite extensive and there are a myriad of studies and techniques that have been developed regarding how best to estimate future ridership. The following are some recommendations and rules of thumb that should be considered in assessing UTN requests in Humboldt County:

- Some requests are to **improve the quality of an existing service**, such as by increasing service frequency within existing service hour or reducing fares. The standard methodology (which is well developed) to estimate ridership for these types of requests is an **elasticity analysis**. This methodology builds upon the field of microeconomics, and considers the change in a service variable to the change in ridership. Just as a change in the cost of a consumer good (like potato chips) has a quantifiable change in the number of items purchased, the change in the frequency of service has a quantifiable change in ridership. The ratio between the change in the service variable and the change in ridership is the “elasticity factor.” Many studies have been conducted to measure real-world elasticity factors for various systems.⁷ Once an appropriate elasticity factor has been identified, it can be used to estimate the change in ridership.
- Other requests are for **expanding the span of service** (the times during which transit service is operated). For instance, extending an existing daytime-only service into the evening or adding Sunday service are both expansions in service span. Ridership forecasts in this case are best evaluated through a review of ridership on similar peer transit systems that already operate over the longer span. For instance, the ridership in the peer system over the proposed longer span may be 20 percent greater than over the current span. If so, it would be reasonable to expect that expanding the span on the local system would result in a similar 20 percent growth in ridership⁸.

⁷ One comprehensive summary of this methodology is “Traveler Response to Transportation System Changes Handbook, Third Edition”, available at www.tcrp.org.

⁸ One note of caution is that any change in service quality at the peer systems between the hours currently operated and the expanded hours should be considered. For instance, many systems operate at lower frequencies in the evening than during the day, which impacts their ratio of evening to daytime ridership.

- UTN requests can also be for transit service to a **new service area**. In this case the best strategy is to consider the transit trip rate of similar areas that are already provided with service. US Census and local jurisdiction parcel data can be used to identify the number households and their characteristics, along with that of similar areas currently served. The daily boardings and alightings in the similar area can then be divided to identify a rate of daily transit trips per household. If there are demographic factors (such as income levels) that warrant adjusting the rate, these should be considered. This resulting rate can then be applied to the number of households in the proposed service area to estimate daily ridership.
- In considering UTN requests, surveys can be useful, but should be considered with caution. There are many factors that can make the results of a survey not a good indication of actual potential ridership:
 - “Self-selection” is a common problem. If respondents volunteer to take a survey, those persons most interested in the results of the survey tend to actually respond and thus the results are not a representation of the overall population. This is a particular issue with on-line surveys or paper surveys printed in a newspaper or available at a counter. A random selection of the overall population (using interviewers) provides much more valid results. Even in a random survey, care must be taken to ensure that those surveyed accurately reflect the overall population. For instance, surveying people on the street near a bus stop may result in a higher proportion interested in transit improvements than a survey conducted at an employee entrance.
 - Biased or simplistic survey design. Survey questions may tend to lead a respondent to an answer (such as “Do you agree that transit service would be a good idea?”). Or the questions may be too simple to yield a useful result. Simply asking “Would you use a transit service?” does not provide information about how often the service would be used, and does not lead the respondent to think through the factors that would limit their ability to use transit such as their work times, the need to make stops along their commute route, or need for a car while at work. To be a valid basis for a ridership forecast, a survey needs to generate information on the various reasons that people would later say they didn’t ride the new transit service.
 - Respondents who provide misleading answers. They may not consider all of the factors that actually limit their potential to use transit service (see above) or may say they desire service in order to increase the chance that it will be available at the infrequent times they would actually use it (such as when their car is being repaired).

Because of these factors, a general rule of thumb in the transit industry is that for every 100 persons saying they desire a new transit service, 6 passengers will actually board the service over a day.

- Simple petitions for new transit service are not a useful basis for UTN decisionmaking. Many people when asked to sign a petition will do so simply to please the petitioner and to be able to quickly get on with their day. A petition with hundreds of signatures can therefore indicate of the persistence of a few petitioners rather than the actual sentiment of the public. LSC has never found a petition for transit service to accurately reflect actual potential ridership.

Once an initial ridership figure has been estimated, a good “check” is to calculate the performance measures of the service option which would address the request and compare that with the current service. The performance of a service expansion is almost always poorer than the existing service, reflecting that the existing service has been designed to serve the riders easiest to attract to the service. As a result, if the performance of a service expansion exceeds that of the existing service, results should be carefully reviewed. For example, if a current service generates 10 passengers per vehicle-hour of service and increasing service frequency generates 15, there is almost certainly something wrong in the calculations.

In conclusion, transit ridership forecasting should be based as much as possible on quantitative techniques, but there will always be some measure of “expert judgement” as no two communities or situations are identical. There are many studies and documents available that provide methodologies for transit demand estimation based on regional or national data. However, LSC has found that more accurate estimates (which are also more easily accepted by local decision makers) are based on local data, if available.

REPORTING OF UNMET NEEDS FINDINGS

The TDA is not specific about what should be included in a report of Unmet Needs Findings. Chapter 2 presented a peer review describing the contents of various reports produced for the UTN process. Below is a more detailed examination of what is included in recent HCAOG reports, and recommendations for future reporting. *Recommendations are shown in **bold italics**.*

Review of HCAOG Reports and Recommendations for Reporting

Resolution: The report starts with a resolution adopting the findings of the UTN process. This is a common and appropriate introduction to the attached report. ***No changes are suggested.***

Executive Summary: This is a one page summary briefly explaining the role of the RPTA, the purpose of the UTN process, the steps of the process, the SSTAC’s recommendation and the

HCAOG’s findings. It is a concise and well written summary which is helpful to the reader. **No changes are suggested.**

1. Transportation Development Act: This section describes the law which governs the UTN process, and identifies the specific articles which direct funding for transit in the County. This is followed by a description of the Unmet Transit Needs Process, including the role of the RTPA and SSTAC and opportunities for outreach. The definitions and criteria used in the UTN process are then enumerated. ***This section should be revised to include updated definitions.***

2. Transit Dependent Demographics and **3. Existing Transit Service: A description of the transit dependent population, including a table, is presented, along with a list and brief description of the existing transit services available in the County. This information is useful, but ***could be simplified and the reader referred to the Transportation Development Plan (TDP) for details.*****

4. Unmet Transit Needs Findings: The stated purpose for the UTN process is followed by the options for findings. This is followed by a recap of the previous year’s findings. The recap starts with a statement that the HCAOG Board adopted findings that there are (were) no unmet transit needs that are (were) reasonable to meet. The section then goes on to list the most common comments from the previous year. ***With a finding of no unmet transit needs, these comments should not be included—the first sentence of the recap is all that is needed. In the case where unmet needs are identified, the status of those needs should be included in the recap.***

The recap of the previous year’s findings are followed by an overview of the current year’s UTN findings. First, the outreach efforts are described, and the reader is advised to see an appendix showing a flyer produced for outreach. The comments received are summarized in tables (Table 4 showing comments received by phone or in writing and Table 5 showing comments received at public hearings). The tables have the following headings:

- **ID:** The individual or groups that made the comment
- **Transit Service:** which transit service provides or would likely provide the service in question
- **Responses:** representing the number of comments regarding the service in question
- **Public comments/requests submitted:** a summary of the service request or service suggestion
- **UTN:** Either an “x” representing that it is an unmet need, or left blank if not an unmet need.
- **Operational:** Either an “x” representing that it is an operational issue rather than an unmet need, or left blank.
- **Other:** An “x” is marked if there is neither an unmet need, nor is it an operational issue.

It is recommended that a column with the category of “Reasonable to Meet” be added to these tables.

After the tables, the reader is referred to appendices which list the full details of the comments received, and again refers to the appendix with the outreach flyer.

The next section of the report provides discussion on the most frequently received comments. The bulk of this discussion covers how many comments were received and from what source, often followed by a brief statement of why the request is or is not warranted. The headings do not make the request clear, and the reader must often read half a page to find the conclusion, which may be just one sentence.

This section could benefit from better organization and clearer purpose. For example, the first “need” is listed under the heading “Samoa Peninsula” while a more descriptive heading of “New Service to Samoa and within the Samoa Peninsula” would better describe the request.

The Lake County “Response and Recommended Findings” (Appendix C) provides a good example of stating the need and summarizing the findings. The write-up includes:

- A numbered list of service suggestions or requests. The headings are in bold and clearly identify what is at issue, and the heading is followed by a brief description of what the request entails.
- An analysis of the need and a response.
- e

This section of the report should reflect the analysis of the comments received.

This section also includes a heading of “CR – Additional Saturday service and new Sunday service” which reports on a request for additional service to College of the Redwoods on Saturdays. The request is accompanied by survey results which were specifically designed by student government to identify the need. The results of the survey are reported in a table and in an appendix. However, the survey methodology is largely flawed. Most notably, respondents were asked to identify which time of day they would use the bus on Saturday if it deviated to College of the Redwoods. While the answers were almost certainly derived at independently, the interpretation was that the respondents intended the results to be combined. For instance, over 30 percent of respondents answered that they would use the bus four or more times per month for each time of day it was offered. The results of these independently asked questions were tallied as though each respondent would use the bus each time of the day all four Saturdays per month, resulting in a grossly overestimated need for service. (See the discussion on Verifying Claims of Unmet Needs, above).

While the methodology of the survey is a problem, the reporting of the survey and its results is also a problem. It is difficult to tell from reading the discussion whether the surveyor or HCAOG staff interpreted the data. A better reporting format would be to ***include the survey methodology, results and summary completely as provided by the submitter in an appendix. The interpretation of the survey by HCAOG staff should be provided in the document text.***

In this particular case, the “facts” that could be reported from the survey include those bulleted items listed under the “Table 6” heading, which includes a statement that 70 of 80 individuals surveyed said they would be in favor of the RTS Mainline route deviating to the CR campus multiple times on Saturdays. The conclusion of need, however, should be linked to other factors. While this is identified as an unmet need, analysis is needed to conclude if it is reasonable to meet. For example, out of over 100 classes, only four are being offered on Saturdays in the fall of 2017. Only 168 students live on campus with only a portion of these students generating transit demand. Ridership on the existing services to the campus on Saturdays is quite low. The indicators are that ridership on the deviated runs would be quite low. HCAOG’s response in the report was to shift the onerous to prove a need to the College of the Redwoods, which is a reasonable conclusion.

5. TDA Funds and Allocations: This section includes a description of the funding, and amounts allocated to each jurisdiction. This is helpful information to provide to the public because it circles back to the whole purpose of the UTN process, which is to help identify which transit services should be funded. ***No changes are suggested.***

List of Acronyms: This is helpful for this jargon-heavy topic. ***No changes are suggested.***

Appendix A: Existing Transit Operators & Services: ***Rather than include this, the reader could be referred to the TDP.***

Appendix B: Public Comments Received via Telephone or Written: ***No changes are suggested.***

Appendix C Record of Public Hearings and Testimony ***No changes are suggested.***

Appendix D Unmet Transit Needs Flyer: ***To the extent possible, outreach materials should be provided here rather than the body of the text.***

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Appendix A: Peer Review

This Appendix presents the Peer Review tables discussed in Chapter Two of this Strategic Plan. Peer agencies (and their acronyms) are listed below.

1. Humboldt County Association of Governments (HCAOG)
2. Tahoe Regional Planning Agency (TRPA)
3. Placer County Transportation Planning Agency (PCTPA)
4. Shasta Regional Transportation Agency (SRTA)
5. Nevada County Transportation Commission (NCTC)
6. Butte County Association of Gov. (BCAG)
7. Tuolumne County Transportation Council (TCTC)
8. Amador County Transportation Commission (ACTC)
9. Madera County Transportation Commission (MCTC)
10. Lassen County Transportation Commission (LCTC)
11. Sac Joaquin Council of Governments (SJCOG)
12. Lake Transit Authority (LTA)

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>

Sources:

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.

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></p> <p>5: PCTPA Transportation Development Act Guidelines, August 2011; Also FY 2011/2012</p> <p>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 (SJCOCG)	<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> <ul style="list-style-type: none"> -Amador Transit's overall service (including administration and overhead) must achieve 10% farebox return. -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. -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
Madera County Transportation Commission (MCTC)	<p>"Reasonable to meet" shall apply to all related public or specialized transportation services that:</p> <ul style="list-style-type: none"> (1) are feasible; (2) have community acceptance; (3) serve a significant number of the population; (4) are economical; and (5) can demonstrate cost effectiveness <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
<p>Shasta Regional Transp. Agency (SRTA)</p>	<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>

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</p> <p>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

Page 1 of 3

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

Page 2 of 3

Agency	Findings, Activities and Reporting for the Unmet Transit Needs Process
<p>Shasta Regional Transp Agency (SRTA)</p>	<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
<p>NCTC</p>	<p>Informal report to the Commissioners.</p>
<p>Butte County Assoc. of Gov. (BCAG)</p>	<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
<p>Tuolumne County Transp Council (TCTC)</p>	<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
<p>Lake Transit Authority (LTA)</p>	<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

Page 3 of 3

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:</p> <ul style="list-style-type: none"> -A timeline for the Unmet Needs Process -Background -Initiation and Methodology -Testimony -Analysis and Needs Determination <p>Each section contains minutes from the following meetings:</p> <ul style="list-style-type: none"> -ACTC -Social Service Transportation Advisory Council -Technical Advisory Committee <p>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:</p> <ul style="list-style-type: none"> -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

Table 5: Outreach Activities

Agency/Area	Activities / Events								
<p>Humboldt County Association of Governments (HCAOG)</p>	<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 								
<p>Butte County Association of Gov. (BCAG)</p>	<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 								
<p>Shasta Regional Transportation Agency</p>	<ul style="list-style-type: none"> - Shasta Transit brainstorm, which includes: <table border="0" style="margin-left: 20px;"> <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								
<p>Tuolumne County Transportation Council (TCTC)</p>	<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. 								

Appendix B: Examples from Peer Websites

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. The websites 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> . The full content of the websites is too extensive to include here, but the cover pages are shown below.

Unmet Transit Needs Process

The next Unmet Transit Needs Cycle is around the corner!

To learn more about the 2018/2019 Unmet Transit Needs Cycle and find ways to make your voice heard, click [here](#).

2017/18 Transit Needs Assessment

The 2017/18 Unmet Transit Needs Cycle was a success! We received dozens of comments for improving transit in the Shasta Region, and presented the findings to the SRTA Board of Directors in February. The Assessment can be found [here](#) with findings and recommendations.

Unmet Transit Needs

The Shasta Regional Transportation Agency annually determines the amount of public transportation funds available for allocation within the cities of Anderson, Redding and Shasta Lake, and the County of Shasta.

Prior to disbursing these [Transportation Development Act](#) funds, SRTA must identify any unmet public transit needs that may exist in Shasta County.

The Transit Needs Assessment is developed to document transit needs and findings and describe the process by which SRTA performed the assessment.

What is an "Unmet Transit Need"?

Distinguishing between an unmet transit need and other transit issues can sometimes be confusing. The table below presents a variety of concerns frequently raised during the unmet transit needs process. The examples, for which SRTA is responsible, represent unmet transit needs. For a formal definition of "unmet transit needs" and when they are "reasonable to meet," please read SRTA's board of directors [resolution 16-14](#).

To immediately leave an Unmet Transit Need comment, click [HERE](#).

Para dejar un comentario inmediato acerca de sus necesidades de transporte público no satisfechas, haz clic [AQUI](#).



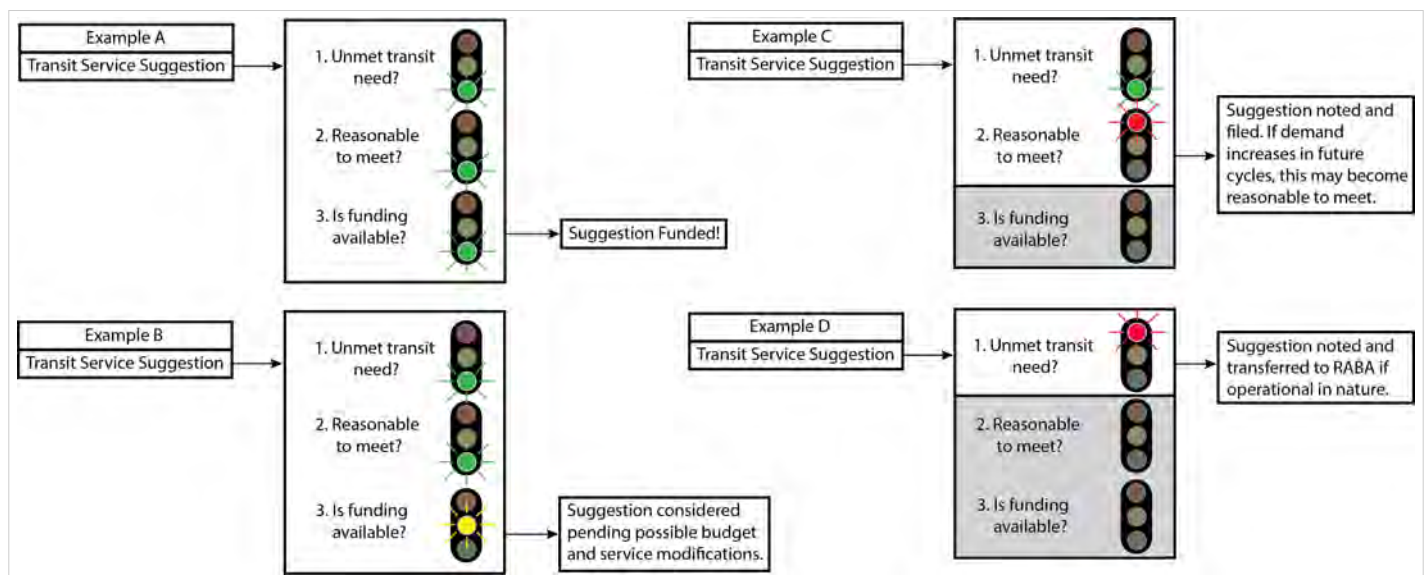
Source: [imgbuddy.com](#)

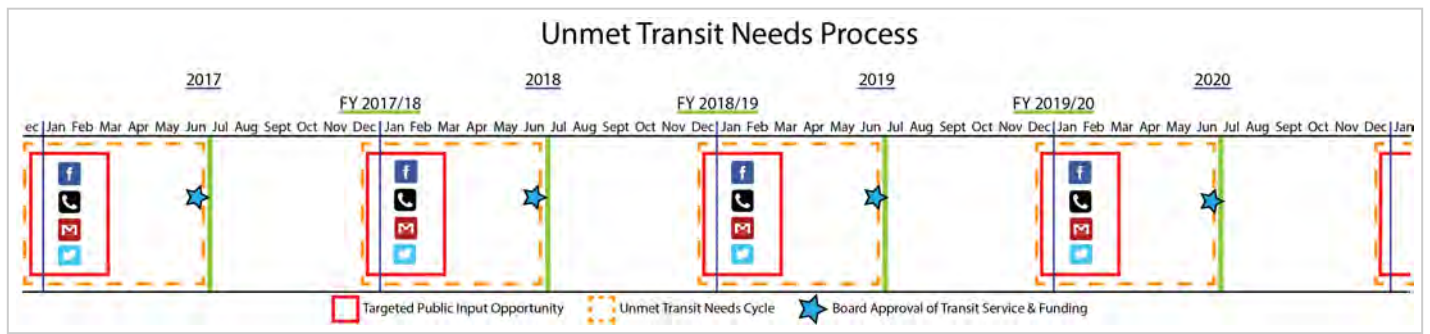
Area of Concern	Examples	Responsible Agency
Expanded Service	Adding a new bus route Longer hours Sunday service Shorter headways (time between buses)	SRTA
RABA/Burney Express Service Issues	Altering existing routes Changing the location of bus stops Comments about customer service	RABA
CTSA Service Issues	Altering existing routes Comments about customer service	CTSA
Other Services	Services not required by SRTA as part of the Unmet Transit Needs process	The cities of Anderson, Redding and Shasta Lake, and county of Shasta may provide other services.

What happens to suggestions I make during an Unmet Transit Needs Cycle?

Comments are accepted year round. Transit service suggestions considered for funding in the upcoming fiscal year are accepted from the close of last year's public input opportunity through the close of the public input opportunity for the upcoming fiscal year. A transit suggestion may be funded for the upcoming fiscal year if the answer to all of the following questions is yes.

- Does it meet SRTA's definition of an "Unmet Transit Need"?
- Does it meet SRTA's definition of "Reasonable to Meet"?
- Is funding available?





Unmet Transit Needs Video



If you need information in another language, call (530) 262-6190.
Si se necessita información en español, llame (530) 262-6190.

Subscribe to Unmet Transit Needs Updates by clicking on the envelope, and selecting "Unmet Transit Needs Updates" under "Notify Me."



If you need information in another language, call (530) 262-6190. Si se necesita información en español, llame (530) 262-6190.

Reports & Assessments

- [2017 / 2018 Unmet Transit Needs Assessment \(PDF\)](#)
- [2016 / 2017 Unmet Transit Needs Assessment \(PDF\)](#)
- [2015 / 2016 Unmet Transit Needs Assessment \(PDF\)](#)
- [2014 / 2015 Unmet Transit Needs Assessment \(PDF\)](#)
- [2013 / 2014 Unmet Transit Needs Assessment \(PDF\)](#)
- [2012 / 2013 Unmet Transit Needs Assessment \(PDF\)](#)
- [2011 / 2012 Unmet Transit Needs Assessment \(PDF\)](#)
- [2011 / 2012 Unmet Needs Finding and TDA Allocations \(PDF\)](#)
- [2011 / 2012 Unmet Needs Presentation \(PDF\)](#)

- [Policy to Conduct the Unmet Needs Process \(PDF\)](#)
- [Resolution 16-14 \(PDF\)](#)

UNMET TRANSIT NEEDS PROCESS

Resources

Useful Transit Links

**UNMET TRANSIT NEEDS
PROCESS**

Bike Maps

Local Agencies &
Organizations

You Are Here: > Home > Resources > Unmet Transit Needs Process

As the administrator of Transportation Development Act (TDA) funds for Butte County, BCAG is charged with performing the annual Unmet Transit Needs process. The purpose of this process is to ensure that all unmet transit needs that are reasonable to meet are met before funds are expended for non-transit uses, such as streets and roads.

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.

Reasonable to meet shall include all of the following criteria:

- Cost Effectiveness: The cost to provide the service will meet the minimum farebox recovery ratio.
- Economy: The project can be implemented at reasonable cost.
- Community Acceptance: Support exists as indicated through the public hearing process.
- Operational Feasibility: The service must be safe to operate.

The process entails a comprehensive public outreach program and a series of workshops throughout the county to obtain testimony on unmet transit needs that may be reasonable to meet. Once the testimony is obtained, it is analyzed to determine if there are any transit needs that meet the adopted definitions of "unmet transit need" and "reasonable to meet". This analysis report, called the Transit Needs Assessment, is reviewed by the Social Services Transportation Advisory Council, which provides a recommendation for unmet transit needs findings to the BCAG Board of Directors. This information is then provided to the BCAG Board, which makes one of the following findings:

- There are no unmet transit needs.
- There are no unmet transit needs that are reasonable to meet.
- There are unmet transit needs that are reasonable to meet.

If the Board determines there are unmet transit needs that are reasonable to meet, the affected jurisdiction must satisfy those needs before any TDA funds may be expended for non-transit purposes.

UNMET NEED ASSESSMENT AND FINDINGS

[2017/2018 DRAFT Unmet Transit Needs Assessment](#)

[2016/2017 Adopted Unmet Transit Needs Assessment](#)

[2015/2016 Adopted Unmet Transit Needs Assessment](#)

[2014/2015 Adopted Unmet Transit Needs Assessment](#)

[2013/2014 Adopted Unmet Transit Needs Assessment](#)

[2012/2013 Adopted Unmet Transit Needs Assessment](#)

[2011/2012 Adopted Unmet Transit Needs Assessment](#)

[2010/2011 Adopted Unmet Transit Needs Assessment](#)

UNMET TRANSIT NEEDS MEETINGS

THE COMMENT PERIOD FOR THE 2017/18 TRANSIT NEEDS ASSESSMENT HAS CLOSED. PLEASE CHECK BACK IN THE FALL FOR NEXT CYCLE'S DATES.

The public is invited to provide comments on existing or desired public transportation services within Butte County at an Open House forum on unmet transit needs at the following meetings:

Because of the Oroville Dam Evacuation, the meetings scheduled for Oroville and Gridley had to be cancelled. If you had planned to attend either of those meetings you are welcome to email your comments by Feb. 23 and they will be given full consideration.

OROVILLE - Monday, February 13, 2017, 11:30 a.m.- 12:30 p.m.

City of Oroville Council Chambers, 1735 Montgomery Street

PARADISE - Monday, February 13, 2017, 2:00 p.m. - 3:00 p.m.

Paradise Town Hall, 5555 Skyway

CHICO - Wednesday, February 15, 2017, 1:00 p.m. - 2:00 p.m.

Butte County Library - Chico Branch, 1108 Sherman Ave.

GRIDLEY - Thursday, February 16, 2017, 1:00 p.m.-2:00 p.m.

City of Gridley Council Chambers, 685 Kentucky Street

BUTTE COUNTY - Thursday, February 23, 2017, 9:00 a.m.

Public Hearing at BCAG Board of Directors meeting,
Chico Council Chambers, 411 Main Street, Chico

** Workshops will not end until all those that would like to speak have been given the opportunity.*

If you prefer, comments may also be submitted via mail, telephone, fax, or [email](#) to Jim Peplow. They will be given the same consideration as those received at the public meetings. Comments must be submitted by Thursday, February 23, 2017 to receive consideration in this year's analysis.

Mail:

Butte County Association of Governments

326 Huss Drive, Ste 150

Chico, CA 95928

Email: jpeplow@bcag.org

Phone: (530) 809-4616

Fax: (530) 891-2979

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Appendix C: Lake County's "Response and Recommended Findings"

Response and Recommended Findings
Lake County FY 2017/18 Potential Unmet Transit Needs
Developed by Social Services Transportation Advisory Council
and Technical Advisory Committee

1. **Medical trips to Saint Helena Clearlake and Sutter Lakeside Hospitals.** There may be an opportunity for funding partnerships with these health centers. Saint Helena Clearlake has been providing some service, however, based on the rate of non-emergency ambulance calls, there appears to still be a need.

Response: Last year, the APC found that service to St Helena Clearlake and Sutter Lakeside hospitals, as well as the Tribal Health clinic, was not an unmet need because extensive transit services are provided to each of these facilities. In addition, transport provided by the clinics and the new LTA/Lake Links Pay-Your-Pal programs supplement transit services. The remaining need is very limited, and does not meet the definition of an unmet need since it does not meet the criteria of a significant number of people in need.

Lake Transit Authority, in its capacity as the CTSA (Lake Links) has continued efforts to develop funding partnerships with health care providers and to find stable funding for additional Pay-Your-Pal services. A Memorandum of Understanding with Saint Helena Clearlake is expected to be adopted before the end of 2016/17. This MOU will provide for the use of an FTA 5310 funded vehicle by Saint Helena Clearlake to support clinic transportation services. In addition, the MOU allows Lake Links to schedule other medical trips on the Saint Helena vehicle(s) when they are compatible with the vehicle schedule. Lake Links will continue efforts to work with both hospitals and with Tribal Health.

During the past year, Lake Links has collaborated with Tribal Health in an effort to identify the need for out of county trips that the clinic cannot provide. It is our hope that the Lake Links program will be able to provide for these out of county trips beginning in 2017/18 through a 5310 grant that has received Caltrans' staff recommendation to the CTC.

Although LTA/Lake Links continues to pursue federal grants to support Pay-Your-Pal, NEMT, and mobility management efforts, the establishment of a Lake Links non-profit agency, and securement of Medi-Cal transportation funding remain keys to a broader and more robust NEMT program to supplement transit and medical provider efforts.

Recommended Finding: This does not meet the definition of an unmet need. However, Lake Transit Authority will continue to work with these local health care providers.

2. **Eastbound service to Spring Valley and further east, allowing people to connect with service to the Sacramento area.** Currently, the closest connection is at the Cache Creek Casino. There may be an opportunity to fund this service with FTA 5311f funding.

Response: There is no opportunity to fund service to Spring Valley and further east in 2017/18, and it is unknown if there will be an opportunity in subsequent years. Therefore, this unmet need is not reasonable to meet.

Caltrans announced several months ago that FTA 5311(f) funding in 2017/18 would be limited to continued funding of existing projects. In addition, it was announced that there would be an across the board cut of 26% for existing projects, and that no "toll credits" would be available. The bottom line is that funding provides for only forty-one percent of existing projects. While funding is not expected to increase in 2018/19, Caltrans has advised that there will be no continuing projects. Rather, every recipient of these funds will have to reapply for existing projects and compete with new project requests. This outlook is not encouraging, but it does not preclude new projects.

The greater problem is providing the local match that would be needed for this service. There is not sufficient TDA funding to support this route without cutting other services. The only available non-TDA source of local match is the state Low Carbon Transit Operations Program (LCTOP), but this program does not provide adequate funds to provide local match for this route. SB1, recently signed into law, will provide additional local funds but it is unknown at this time whether or not they will be sufficient to support new bus routes in 2018/19 or thereafter. If funding appears adequate, an FTA 5311(f) application can be prepared for 2018/19.

Recommended Finding: This is an Unmet Need, but is not reasonable to meet at this time.

3. **Non Emergency Medical Transportation in outlying areas.** This would serve areas beyond one mile from fixed routes, and vehicles need to include wheelchair lifts.

Response: Last year, the APC found that this is an unmet need that is not reasonable to meet. During the past year, LTA/CTSA has taken steps that may improve services to outlying areas. These include support for clinic operated wheelchair lift equipped vehicles, and further development of the volunteer driver programs. These meet more of the need, but fall short of a dedicated program to provide wheelchair lift equipped service that will meet widely dispersed trips in outlying areas. LTA/CTSA is continuing its efforts to secure funding for a pilot project that would provide wheelchair lift equipped service. Through its Mobility Manager contract, LTA/CTSA is seeking Medi-Cal funding to help support the service. LTA/CTSA is continuing to work with the health and social services community to define the need and potential funding agreements for service.

Recommended Finding: This is an Unmet Need and it is reasonable to meet some of this need at this time. The CTSA is developing additional programs to meet the remaining needs.

4. **Non Emergency Medical Transportation to out of county locations.** This is needed for both adults and children. There is a particular need for transport to Santa Rosa and San Francisco.

Response: LTA, through its Lake Links CTSA program, will implement a program to provide NEMT service to out-of-county locations in 2017/18 provided that an FTA 5310 grant is received as expected. LTA has been notified that Caltrans has recommended to the California Transportation Commission that this grant be awarded. It is expected to provide \$225,139 for Out-of-County NEMT services and for senior center transportation programs.

Recommended Finding: This is not an unmet need. With the award of the FTA 5310 grant, LTA will be able to provide service that meets the identified need.

5. **Expanded transit service and Mobility Training to accommodate job placement for developmentally disabled.** New enhanced requirements for competitive integrated job placement will be implemented soon necessitating transportation to and from jobs, potentially outside of normal transit operating hours. It is likely that demand response service would be needed to fit this potential need.

Response: To the extent that the need is within Lake Transit operating hours, this need will be accommodated by Lake Transit routes or paratransit services provided that the origin and destination are within one mile of fixed routes. If the need is outside of normal operating hours, Lake Transit is not required to provide service under the ADA. It is unknown at this time if there is an unmet need. If there is an unmet need, the Redwood Coast Regional Center is responsible to fund transportation needs of developmentally disabled persons. LTA would consider providing such service under contract with RCRC.

Recommended Finding: This is not an unmet need. Lake Transit Authority will monitor the situation to see if additional needs arise.

6. **Fixed route service on Sundays for the north shore communities.**

Response: It is unknown if this is an unmet need as there is no documentation. Based on industry statistical evidence, transit service attracts fewer riders on Saturday than weekdays, and fewer on Sunday than on Saturday. If there were an unmet need, it could only be met at this time by cutting existing service.

Recommended Finding: This does not meet the definition of an unmet need.

7. **Deviation from the fixed route in Lucerne to accommodate senior center lunch program.**

Response: Lake Transit Authority will deviate from its fixed route to accommodate the senior center lunch program.

Recommended Finding: This is an unmet need that is reasonable to meet.

Appendix D: Unmet Transit Needs Materials for HCAOG Website

UNMET TRANSIT NEEDS PROCESS

What will HCAOG do with your input?

Each year, HCAOG asks residents, especially those who are transportation disadvantaged, what transit needs they have which are not being met. This helps us prioritize how we use public transit funds. The reality is that funding is limited, and while our desire is to meet as many of the mobility needs as we can in Humboldt County, we cannot meet all of the needs. But, to meet your needs, we must first identify them. Please help us with that.

This “unmet needs process” is important to help us identify needs which may be reasonable to meet. We follow these steps:

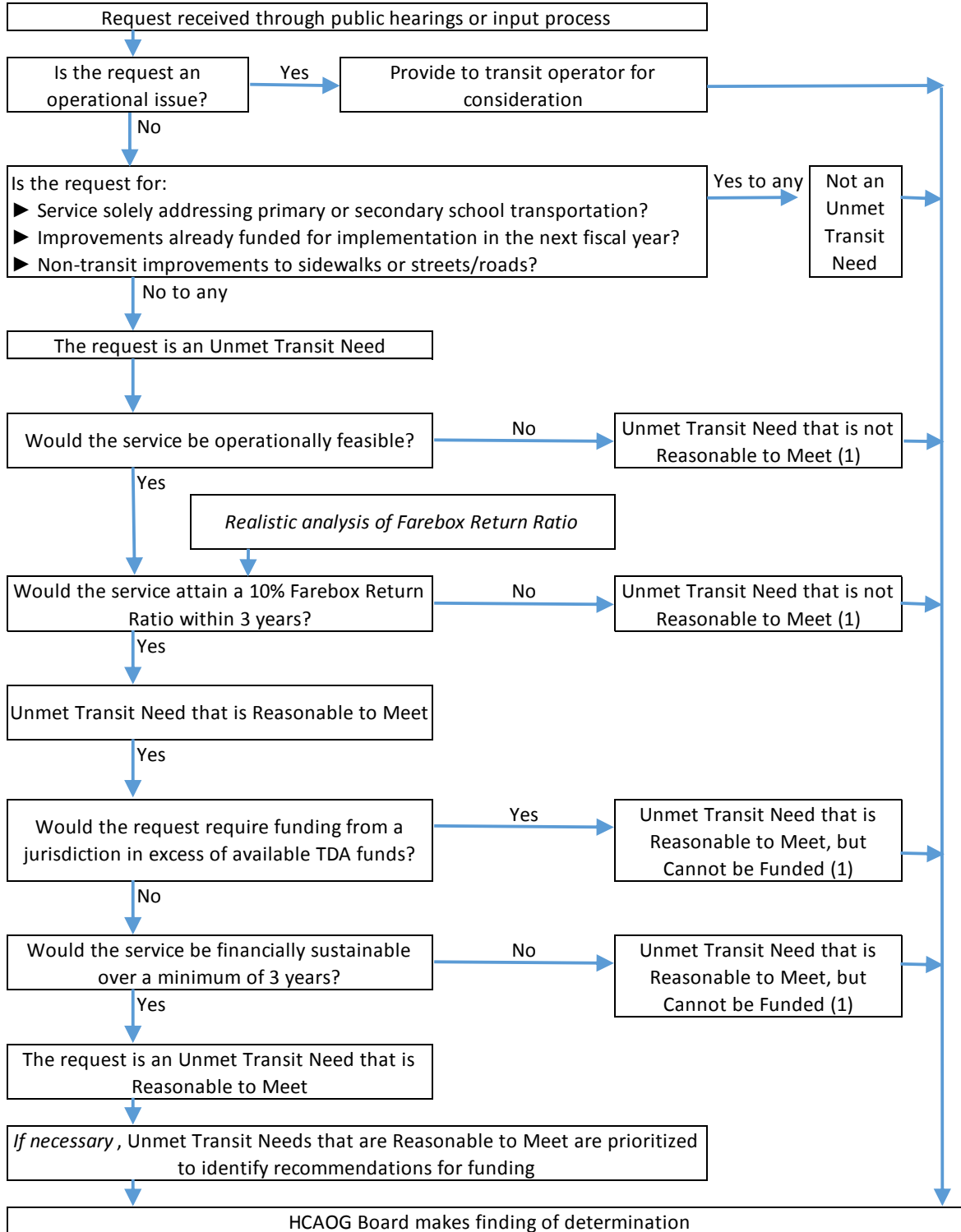
1. We receive your requests, via email or letter on an ongoing basis, or at specific public meetings held every year. In making your request, **be specific!** When do you need service? What days of the week? What time of day? Where do you want to start and end your trip?
2. Our staff and our SSTAC will review your request(s) and make sure we understand what you are identifying as an unmet transit need.
3. We will determine if your need is currently being met in any way. Sometimes what you are asking for is already available, or can be addressed through a minor transit operations change that need not go through the review process.
4. If the SSTAC determines that your need meets the criteria as “an unmet transit need” the next step is to find out if it is “reasonable to meet.”
 - HCAOG staff will evaluate the operating requirements for meeting the need (logistics, vehicles, staff) and estimate the cost. We will work with transit providers to help us with this task.
 - If the service is operationally feasible, financially viable, and will generate ridership that is expected to generate fares equal to at least 10 percent of the additional operating cost within two years, it will be found “reasonable to meet.” HCAOG staff will consider your comments,

survey results and estimates of use, but we will use transit planning methodologies for projecting expected ridership. For example, we will compare rates of transit use for similar services operated in similar areas. HCAOG staff will estimate fare revenue based on existing fares and projected ridership.

5. Once the list of “reasonable to meet” service requests are determined, SSTAC will use operating costs, performance measures and the service’s consistency with overall transit plans to prioritize such needs.
6. The SSTAC’s resulting recommendations are provided to the HCAOG Board for their consideration and approval.
7. We will fund and implement reasonable-to-meet needs if they are identified as a priority and if sustainable funding sources are available for the service.
8. The list of reasonable-to-meet needs that are not funded in the current year will be reviewed each subsequent year to determine if they still qualify as reasonable to meet. If they are no longer considered reasonable to meet, they will be no longer be included. If they remain reasonable to meet, they will be considered for funding under the same guidelines as above.

Requests for services can be provided by emailing todebra.dees@hcaog.net or writing to HCAOG Office, 611 I Street, Suite B, Eureka, CA 95501.

HCAOG Unmet Needs Process Flowchart



Note1: May be considered in future years if financial, ridership or other pertinent conditions change