METROPOLITAN

TRANSPORTATION

COMMISSION

Agenda Item 8a
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105
TEL 415.778.6700
WEB www.mtc.ca.gov

Memorandum

TO: Planning Committee   DATE: February 2, 2018

FR: Executive Director   W.I. 1311

RE: <u>MTC Resolution 4310: 2018 Coordinated Public Transit-Human Services Transportation Plan</u>

Background

In 2016, MTC staff began the process for amending and updating the region's Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan). First completed in 2007, and last updated in 2013, the Coordinated Plan is a federal requirement under the Fixing America's Surface Transportation (FAST) Act. This requirement stipulates that projects funded through the Section 5310 Enhanced Mobility for Seniors and Persons with Disabilities program, must be included in a locally developed Coordinated Plan.

The updated 2018 Coordinated Plan is intended to meet federal planning requirements, establish the region's funding priorities, and provide our partners with a range of coordination solutions that will advance local efforts to improve transportation for individuals with disabilities, older adults, persons with low incomes and veterans. For this update, staff conducted a review of relevant research and best practices, updated the Bay Area's demographic profile with a focus on pertinent populations, and documented the region's existing transportation services.

Staff received guidance and input on the draft update from a Technical Advisory Committee which included representatives from various transit and human services transportation perspectives. Additionally, extensive outreach was conducted to transportation disadvantaged populations, their advocates, and agencies who serve them. More than 300 individual comments were captured during this outreach, and were individually classified as either identifications of existing transportation gaps or suggestions of potential transportation solutions and were incorporated into the Draft Coordinated Plan.

The draft 2018 Coordinated Plan update was released for public review and comment on November 27, 2017 and the comment period closed on January 11, 2018. Public comments received on the draft plan are included in Attachments B and C. Public comments on the plan included implementation ideas, funding questions, and transportation gap identification. Additionally, many comments were submitted on recommended strategies, including support for county-based mobility management and improvements to paratransit service. We have made appropriate changes to the draft plan based on the comments received.

Next Steps

Staff is requesting the Planning Committee refer MTC Resolution No. 4310, the 2018 Coordinated Public Transit-Human Services Transportation Plan for the San Francisco Bay Area to the Commission for approval. Following adoption, staff will begin working on implementing recommendations from the plan in collaboration with partner agencies and stakeholders.
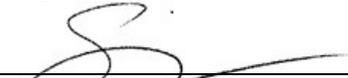
Steve Heminger

Attachments:

- Attachment A: MTC Resolution 4310: 2018 Coordinated Public Transit-Human Services Transportation Plan (Executive Summary only). The entire Plan is available for review in the MTC/ABAG Library or online at https://mtc.ca.gov/our-work/plans-projects/other-plans/coordinated-public-transit-human-services-transportation-plan
- Attachment B: Appendix H, Summary of Comments Received on the Draft 2018 Coordinated Public Transit-Human Services Transportation Plan
- Attachment C: Contra Costa County Board of Supervisors comment letter

SH:ds
J:\COMMITTE\Planning Committee\2018\02_PLNG_Feb 2018\8ai_Coordinated Plan.docx

Date: February 28, 2018
W.I.:   1311
Referred by: Planning

ABSTRACT

Resolution No. 4310

This resolution adopts the 2018 Coordinated Public Transit-Human Services Transportation Plan for the San Francisco Bay Area.

The following attachment is provided with this resolution:

Attachment A — 2018 Coordinated Public Transit-Human Services Transportation Plan

Discussion of the 2018 Coordinated Public Transit-Human Services Transportation Plan is contained in the Executive Director's Memorandum to the Planning Committee dated February 2, 2018.

RE: <u>2018 Coordinated Public Transit-Human Services Transportation Plan</u>

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4310

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code 66500 *et seq*.; and

WHEREAS, the Moving Ahead for Progress in the 21st Century Act (MAP-21) requires that projects funded through the Enhanced Mobility of Seniors and Individuals with Disabilities program be included in a locally developed Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan) beginning in Fiscal Year 2013; and

WHEREAS, the Fixing America's Surface Transportation (FAST) Act requires that projects funded through the Enhanced Mobility of Seniors and Individuals with Disabilities Program be included in a locally developed, Coordinated Plan beginning in Fiscal Year 2015; and

WHEREAS, MTC has dedicated significant resources toward planning efforts that have focused on the transportation needs of low-income, senior and disabled residents in the Bay Area, including the community-based transportation planning program;

WHEREAS, the California Legislature enacted the Social Service Transportation Improvement Act (Chapter 1120, Statutes of 1979) (hereafter referred to as AB 120) with the intent to improve transportation service required by social service recipients; and

WHEREAS, under the auspices of the Social Service Transportation Improvement Act, MTC designates agencies to serve as Consolidated Transportation Service Agencies (MTC Resolution 4097, Revised); and

WHEREAS, MTC completed the region's Coordinated Public Transit-Human Services Transportation Plan in 2007 and updated the plan in 2013 (MTC Resolution 4085); and

WHEREAS, the 2018 Coordinated Public Transit-Human Services Transportation Plan revises the 2013 Coordinated Plan to include new demographic, transportation service gaps and solutions, and regional context information; now, therefore, be it

RESOLVED, that MTC approves the 2018 Coordinated Public Transit-Human Services Transportation Plan as forth in Attachment A of this resolution, and be it further

RESOLVED, that the Executive Director of MTC is hereby authorized to forward the Coordinated Plan Update to the Federal Transit Administration and such agencies as may be appropriate.

METROPOLITAN TRANSPORTATION COMMISSION

Jake Mackenzie, Chair

The above resolution was entered
into by the Metropolitan Transportation
Commission at a regular meeting of
the Commission held in San Francisco,
California, on February 28, 2018.

2018 Coordinated Public Transit-Human Services Transportation Plan

The 2018 Coordinated Public Transit-Human Services Transportation Plan is incorporated by reference.

The plan and appendices are available in the MTC/ABAG Library, and on-line at
https://mtc.ca.gov/our-work/plans-projects/other-plans/coordinated-public-transit-human-services-transportation-plan

COORDINATED PUBLIC TRANSIT-HUMAN SERVICES TRANSPORTATION PLAN

February 2018

METROPOLITAN TRANSPORTATION COMMISSION

EXECUTIVE

SUMMARY

METROPOLITAN TRANSPORTATION COMMISSION

SETTING THE VISION

This is a forward-thinking, big picture plan for the region that guides MTC's coordination with partners throughout the Bay Area.

This Coordinated Public Transit-Human Services Transportation Plans goes beyond its basic federal requirements—considering the mobility needs of seniors, people with disabilities, people on low-incomes, and veterans—and designates strategies to guide MTC's efforts over the next four years.

This plan asks the question:

How can MTC and its partners provide mobility options for seniors, people with disabilities, veterans, and people with low incomes that are also cost efficient for the region?
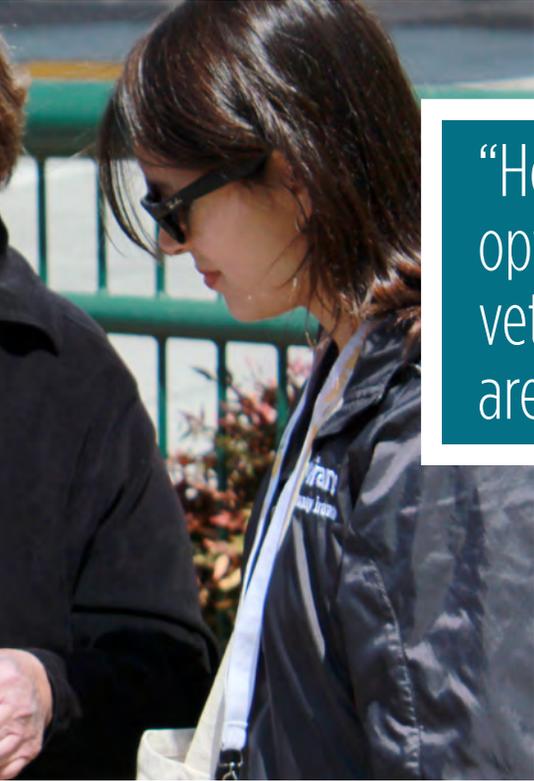
"How can MTC and its partners provide mobility options for seniors, people with disabilities, veterans, and people with low incomes that are also cost efficient for the region?"

WHO IS SERVED?

The Coordinated Plan envisions a cost-effective expansion of services for seniors, people with disabilities, veterans, and those with low incomes.

Existing Targeted Services	Seniors	People with Disabilities	Veterans	Low-Income Populations
Fixed-route transit	✓	✓	✓	✓
ADA-mandated paratransit		✓		
Community-based shuttles	✓	✓	✓	✓
Private demand-response transportation	✓	✓	✓	✓
Subsidized fare or voucher programs	✓	✓		✓
Volunteer driver programs	✓		✓	
Information and referral	✓	✓	✓	✓
Travel training	✓	✓		
Mobility management	✓	✓	✓	✓

KEY CHALLENGES FOR THE REGION

The Bay Area's population is aging, and the portion of the population living in poverty has increased and suburbanized in the last decade. Combined with a growing share of the population that lacks access to a vehicle, this means that fewer of the most vulnerable people in our region have access to opportunities.

WHAT DOES THE DATA TELL US?

Predictions for the region's growth through the year 2040 indicate that the senior population will grow from 14% of today's population to 23% of the 2040 population.[1] However, those seniors are expected to stay healthy longer, with almost no growth expected in the portion of the population that is disabled.

Bay Area Demographics
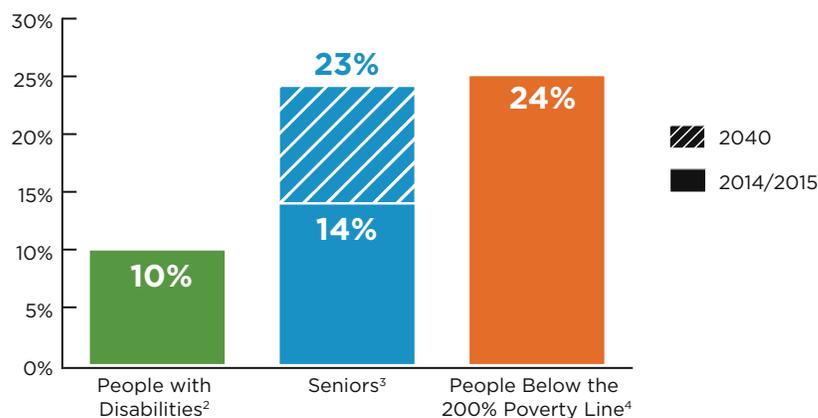
The cost of providing paratransit is increasing. According to the Federal Transit Administration, between 1999 and 2012, the average cost per trip on ADA paratransit services increased 138%, from $13.76 to $32.74.[5]

Today, 24% live in poverty in the Bay Area. Poverty has risen faster in suburban than urban areas, particularly in Solano, Contra Costa, and Marin counties. Low-income populations increasingly have less access to public transit and public services.

---

1. 2014 American Community Survey 5-Year Estimate S0101; Metropolitan Transportation Commission and Association of Bay Area Governments, Plan Bay Area 2040 Projections, Scenario 2040_03_116

2. 2014 American Community Survey 1-Year Estimate S0103

3. 2014 American Community Survey 5-Year Estimate S0101; Metropolitan Transportation Commission and Association of Bay Area Governments, Plan Bay Area 2040 Projections, Scenario 2040_03_116

4. 2015 American Community Survey 1-year Estimate B17002

5. FTA Report No. 0081, Accessible Transit Services for All

Change in Population Living in Poverty

2000 to 2014
Population below 200%
federal poverty line,
$34,100 for a family of four in 2000
$47,700 for a family of four in 2014

Tracts Within Urbanized Areas
(Dicennial Census 2000/ ACS 2014)

- Decreased by more than 1,000
- Decreased by 500 to 1,000
- Decreased by 50 to 500
- No Change
- Increased by 50 to 500
- Increased by 500 to 1,000
- Increased by more than 1,000

	Population
Oakland	More than 350,000
Sunnyvale	50,000 to 350,000
Albany	Less than 50,000

Miles
0   3   6   9   12

Kilometers
0   4   8   12   16

MTCGIS/KS August 2016

WHAT DO REGIONAL STAKEHOLDERS SEE AS THE BIGGEST GAPS?

Representatives from over 30 Bay Area stakeholder groups were asked to identify the biggest mobility gaps faced by their constituents. These are the most common themes heard.

- Spatial gaps—areas of our region that are either difficult or impossible to reach by public transportation—continue to be a key need expressed throughout the region

- Temporal gaps—points in time that lack service—also constrain the mobility of target populations

- With regional consolidation of facilities and growing rates of disease, healthcare access is a major concern in the region

- Transit and paratransit fares are unaffordable for many people in all parts of the Bay Area

- Funding needs are growing faster than revenues

- Constituents recognize that safety investments for pedestrians and people on bicycles improve mobility for all, and increase access to transit

- While suggestions were made to leverage emerging mobility service providers to assist in solving mobility gaps, people are concerned about the lack of accessibility of both taxis and ride-hailing services

- Stakeholders highlight the importance of transportation information availability and associated referral services to steer people to gap-filling services

- Consistent with the 2013 Plan, transfers on both the fixed-route transit network as well as between ADA Paratransit service providers (when trips cross county lines, for example) are barriers

COORDINATION STRATEGIES

Strategies are big picture initiatives that MTC and its local partners can implement or facilitate. The plan identifies the following strategies for MTC and its partners:

IMPLEMENT COUNTY-BASED MOBILITY MANAGEMENT

Develop County-Based Mobility Management Across the Region that will direct passengers to all available transportation options and increase efficiency through coordination. A county-based mobility management program should include in-person eligibility assessments, travel training, and information and referral services.

The graphic below describes the typical Mobility Management process, in which an individual seeking mobility services works with a Mobility Manager to assess their needs, and to be referred to services, subsidy programs, or training opportunities for which they are eligible.

Low-income Households, Individuals With Disabilities, Seniors

Mobility Manager

Assessment And Eligibility

Information And Referral

Travel Training

Fare Subsidy

Volunteer Driver Program

Transit

Community Shuttle

Paratransit

Active Transportation

Vanpool

Taxi and Ride-Hailing
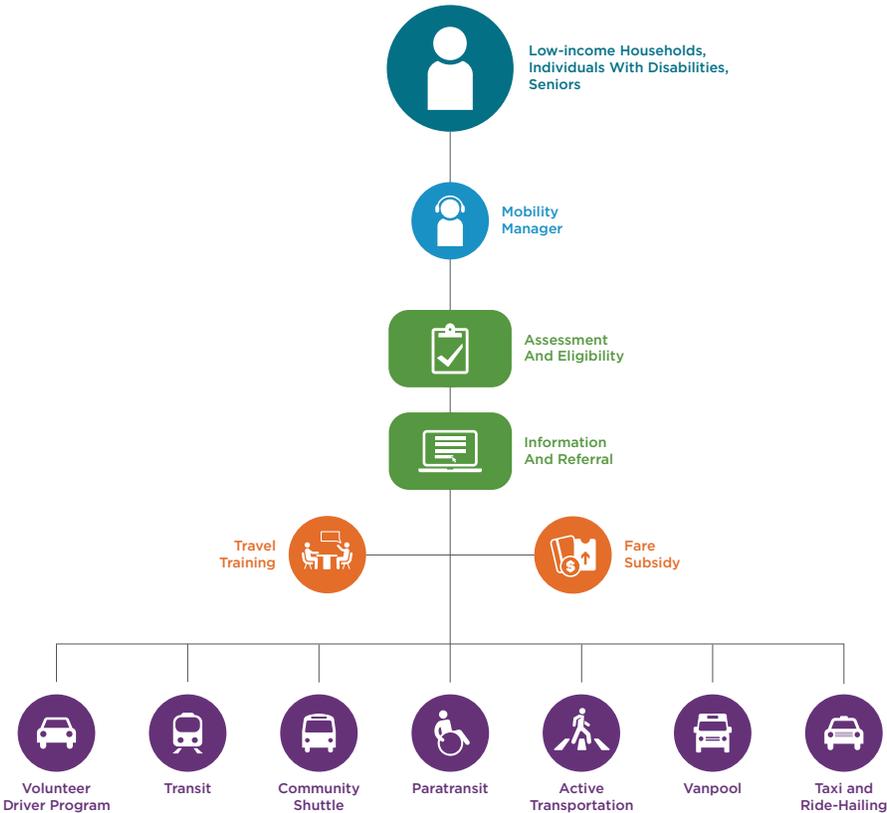
IMPROVE PARATRANSIT

Address Access to Healthcare by supporting cost sharing agreements between transportation providers and healthcare clinics, and by exploring Medi-Cal cost recovery programs for public and private providers in the Bay Area.

Reduce the Cost of Providing ADA Paratransit. Implementation of mobility management strategies will help address paratransit per-rider costs, including in-person eligibility assessments and software upgrades to allow for trip screening or Interactive Voice Response systems.

Make it Easier for Customers to Pay by exploring potential solutions with Clipper 2.0

PROVIDE MOBILITY SOLUTIONS TO SUBURBAN AREAS

Increase Suburban Mobility Options. MTC can provide guidance on public-private partnerships, increasing the availability of subsidized same-day trip programs, increasing the functionality of information and referral systems such as "one-call/one-click" solutions, and subsidizing low-income carshare pilots or vehicle loan programs.

REGIONAL MEANS-BASED TRANSIT FARE PROGRAM

Means-Based Fare Program. To make transit more affordable for low-income people, MTC and partners should implement a financially viable and administratively feasible program.

SHARED AND FUTURE MOBILITY

Advocate for the Accessibility of Shared Mobility Solutions and Autonomous Vehicles. MTC and partners ensure equity and accessibility of bikeshare, carshare, ride-hailing, and other new mobility options by issuing policy guidance and technical assistance for agencies and non-profits entering into partnerships.

IMPROVE MOBILITY FOR VETERANS

Support Veterans'-Specific Mobility Services. Serve localized and long-distance medical trips for veterans and create opportunities for veterans to advise MTC on mobility needs.

ACTION PLAN

To cost efficiently serve seniors, people with disabilities, veterans, and people with low incomes with a range of mobility options, this plan outlines key actions for MTC and its regional partners over the next four years.

① KEEP THE MOMENTUM
(6-12 months)

② IMPLEMENT THE BASICS
(1-2 years)

③ BUILD OUT THE PROGRAM
(3-4 years)

In the first year of the 2018 Coordinated Plan's adoption, MTC and its regional partners—transit operators, human service providers, Congestion Management Agencies, and others—should keep the momentum from the planning process by setting policies and establishing internal frameworks.

One to two years after adoption, the region should begin to see visible impacts of the planning process, with service pilots, coordination summits, and other basic programs being implemented.

In the three to four year time frame, the major strategies for the region—county-based mobility management, means-based fares, in-person eligibility, access to health care, and an open dialog with shared mobility service providers—should come to fruition.

FOR MORE INFORMATION

Please contact:

Metropolitan Transportation Commission

415.778.6700

mtc.ca.gov

METROPOLITAN TRANSPORTATION COMMISSION

Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

415.778.6700

www.mtc.ca.gov

Appendix H – Public Comments on Draft Plan

Draft Plan Public Comment Period   November 27, 2017 – January 11, 2018
On November 27, 2017, the 2018 Draft Coordinated Plan Update was released to the public for review and comment. The draft plan was posted on MTC's website, and over 900 stakeholders and interested members of the public were notified via email.

Below are comments received during the public comment period of November 27, 2017 – January 11, 2018.

	Category	Comment/ Commenter	Response
1	**Regional Strategies for Coordination**	Paratransit riders have been asking when Clipper will be available on paratransit. This should be a requirement for Clipper 2.0, providing equal access to this technology that continues to receive substantial regional funding. *Petaluma Transit*	The issue of Clipper availability on paratransit is noted as an issue in Ch. 5.
2	**Transportation Gap or Solution**	The trend in transit is toward low-floor buses and LRVs, except in San Francisco. Steep stairs on MUNI LRVs make boarding difficult. Wheelchairs boarding buses are often disruptive and time-consuming. With the increase in seniors, especially in San Francisco, where car ownership is low, MUNI should be making changes to address the needs of seniors and the disabled. *Robert Bregoff*	The plan presents general guidance for regional prioritization, and not recommendations for individual transit operators. All transit operators are required to provide accessible service on their fixed-route vehicles, which may include buses and trains equipped with wheelchair lifts or low floor ramps to allow easy access for people with disabilities.
3	**Transportation Gap or Solution**	The number of non-working escalators at BART and MUNI stations is shocking. Recently only 2 of the escalators at Civic Center station were operating. *Robert Bregoff*	Accessibility of transit stops and stations is noted as a need in Chapter 4, Appendix C, and Appendix E.
4	**Transportation Gap or Solution**	Seniors driving unnecessarily are a danger to cyclists and pedestrians. The state should dissuade rather than encourage people over, say, 75, from driving, and provide them with reliable transport. I'm over 60 and very healthy but have noticed that my reflexes, vision, and hearing aren't what they once were. Driving is more stressful for me because of this. *Robert Bregoff*	The challenges of senior mobility as a result of losing the ability to drive is noted in Chapter 2. Travel training for seniors is noted as a need and solution in Chapter 3, Chapter 5, Appendix C and Appendix E.

	Category	Comment/ Commenter	Response
5	**Implementation**	It would be helpful if the Coordinated Plan webpage had links to local mobility management efforts and service providers. *Joanna Pallock*	This will be considered during implementation.
6	**Other**	As discussed in Chapter 5 and in Appendix D, having a process to designate Consolidated Transportation Service Agencies in each county is a very good idea. It is important to have a community based collaborative process and a level playing field for the evaluation of agencies who wish to be CTSAs, rather than agencies self-designating. *Choice in Aging*	The process to designate Consolidated Transportation Service Agencies is described in Appendix D.
7	**Funding**	Is there funding from MTC (or another source) for a county mobility management plan, if one does not currently exist? Considering the "lack of capacity" of the existing system identified in the plan, such a funding source is critical if meaningful progress is to be made in this area. *Choice in Aging*	Various funding sources such as the FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities and the Caltrans Planning Grant program allows planning for mobility management as an eligible activity.
8	**Implementation**	In chapter 5 the text says that "MTC can host regular events with transit operators…" Hopefully, these events will be at a convenient location within the county where the transit operators and agencies are located. *Choice in Aging*	Staff will make every effort to host events throughout the region.
9	**Regional Strategies for Coordination**	The strategy, "Improve Paratransit" includes the action to "…make it easier to pay for ADA paratransit services." The County appreciates the Plan including this concept; it highlights the critical accounting component of an effective mobility management operation. *Contra Costa County Board of Supervisors*	The issue of paratransit payment is noted in Chapter 5.
10	**Transportation Gap or Solution**	We appreciate the comprehensive discussion regarding paratransit transfer trips. Too often, plans superficially cover the topic of transfers on paratransit services, leaving the reader to assume they	The issue of transfers between ADA paratransit providers is noted in Chapter 4, Chapter 5, Appendix B, Appendix C, and Appendix E.

	Category	Comment/ Commenter	Response
		are similar to transfers on fixed route transit. This is far from the case; transfer trips are much more disruptive. *Contra Costa County Board of Supervisors*	
11	**Transportation Gap or Solution**	One critical issue is left unaddressed in the transfer discussion, that of safety. We request that this additional safety information be included in order to have a complete and accurate discussion regarding transfers. *Contra Costa County Board of Supervisors*	Safety concerns have been incorporated into Chapter 4.
12	**Other**	The Plan includes references to a "Roadmap Study" which includes recommendations for mobility management programs. Please include this Study as an appendix to the Plan. *Contra Costa County Board of Supervisors*	The Roadmap Study was an implementation activity stemming from the 2013 Coordinated Plan. Recommendations from the study were incorporated into the 2017 Coordinated Plan update and can be the basis for future implementation.
13	**Regional Strategies for Coordination**	The County applauds MTC for providing a focused implementation timeline including the initial strategy of recognizing mobility management as a regional priority. We also appreciate the candid statement in the plan, "Current senior-oriented mobility services do not have the capacity to handle the increase in people over 65 years of age…" The County believes the strategies in the Plan should be correspondingly explicit. *Contra Costa County Board of Supervisors*	The strategies presented in the plan have grown from feedback received from user groups, their advocates, and existing local providers of transportation and human services, and are intended to provide a general guidance.
14	**Implementation**	The Plan provides excellent background on the efforts at the federal and state level to increase coordination of paratransit services. The Plan should consider the impact of these efforts, whether or not they are adequate, and if we can achieve more. *Contra Costa County Board of Supervisors*	The plan presents general and preliminary guidance for regional prioritization. Evaluation of efforts in the Bay Area can be considered during implementation.
15	**Other**	The Plan briefly touches on impactful approaches in discussing Consolidated Transportation Service Agencies, one-call/one-click operations, and the wide spectrum transportation provider types. Explicitly discussing the topic of consolidation of services (e.g.	The plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be approached differently in a local context. The strategy to

	Category	Comment/ Commenter	Response
		eligibility, maintenance, financial services, scheduling/dispatch, and transportation operations) and the various methods of doing so (e.g. non-profit, administrative vs. full-service brokerage) would provide a more complete discussion and increase the usefulness of the document. *Contra Costa County Board of Supervisors*	implement county-based mobility management is intended to provide a regional framework, while still allowing each county to tailor local solutions. Chapter 3 notes that coordination and cooperation could increase cost efficiency and improve services for end users.
16	**Funding**	The Bay Area made great strides in our transportation system, due in part to the leadership of MTC. We urge MTC to bring this trend of success to the paratransit field and offer comprehensive, funded strategies to address the "lack of capacity" highlighted in the plan. This would allow the population assisted by this type of service to equitably benefit from MTC's substantial regional efforts. *Contra Costa County Board of Supervisors*	The issue of funding availability and consistency is noted as a key gap in Chapter 4.
17	**Transportation Gap or Solution**	Same day accessible service is generally lacking in the Tri-Valley and across the region. This also includes options for wheelchair breakdown services. *LAVTA Wheels Accessible Advisory Committee*	Same day accessible service is noted as a need in Appendix C and in Appendix E.
18	**Regional Strategies for Coordination**	Expansion of low-income youth fare is highly desired, especially a continuation of the pilot Alameda County Student Transit Pass Program, funded for three years through Measure BB. *LAVTA Wheels Accessible Advisory Committee*	Affordability of transportation is noted as a need and solution in Chapter 4. Subsidized transportation services is listed as a strategy in Chapter 5.
19	**Regional Strategies for Coordination**	From a consumer's perspective, there is a lack of standardization of administration of ADA-services throughout the MTC region. Development of a standard paratransit ID card that can be used throughout all systems in the Bay Area is highly desired. *LAVTA Wheels Accessible Advisory Committee*	The need for county-based and regional coordination is noted in Chapter 5. This can be considered during implementation.
20	**Transportation Gap or Solution**	Improvement of transfers and coordination between providers for regional trips is highly desired. *LAVTA Wheels Accessible Advisory Committee*	Regional trip coordination is noted as a need in Chapter 4 and in Appendix E.

	Category	Comment/ Commenter	Response
21	**Transportation Gap or Solution**	Expansion of LAVTA's Go Dublin pilot, which utilizes Transportation Network Companies, to other areas in the Tri-Valley. TNCs offer a more cost-effective way to provide paratransit trips for able individuals. Encouraging TNCs to include wheelchair accessible vehicles is ideal for equitable service. The convenience of on-demand paratransit rides is highly desired. *LAVTA Wheels Accessible Advisory Committee*	The need for wheelchair accessible vehicles and for policies related to TNC service provision are noted in Chapters 4 and 5.
22	**Regional Strategies for Coordination**	Incorporation of Mobility Management Programs is a great strategy; it could be beneficial to mirror a Mobility Management Program or software already in place in another region. *LAVTA Wheels Accessible Advisory Committee*	This can be considered during implementation.
23	**Other**	Coordination with other public entities like public works, park and rec dept, etc. will better promote walkable communities. *Alameda County Public Health Department*	Coordination with park and recreation departments has been incorporated into Appendix F.
24	**Regional Strategies for Coordination**	Equal to coordination should be communication. It seems like there is much to navigate and that there are many stakeholders, including the end-user (the client), who needs to know the information. *Alameda County Public Health Department*	As noted in Chapter 5, the coordination of information and referral services provide a central point of contact for end-users to access mobility managers, who provide resources and traveler information.
25	**Transportation Gap or Solution**	I have a concern about charging premium rates for premium service and how it impacts low-income riders. Does paying fall on the client? Can the charge be shared or subsidized by the entity on the other end? How would the fee/rate be determined in a way so that it doesn't provide another barrier to low-income riders getting where they need to go? *Alameda County Public Health Department*	Chapter 5 notes the need to expand subsidized same-day trip programs.
26	**Implementation**	Coordination summits for periodic discussion of mobility management-related issues and progress in the region, and the sharing of best practices is great. I think periodic and regularly soliciting feedback is always a good thing. *Alameda County Public Health Department*	As noted in Chapter 5, coordination summits are being recommended during implementation.

	Category	Comment/ Commenter	Response
27	**Regional Strategies for Coordination**	Create Mobility Managers and Designate Consolidated Transportation Service Agencies (CTSAs): Managers/coordinators are important. I'm just wondering if there are policies or guidelines laid out by the Feds or MTC Commission about how the managers should be engaging local cities, human service agencies, disability advocacy, etc. (all the stakeholders) because it would be good to have a way to measure efficacy in implementation. *Alameda County Public Health Department*	Staff makes every effort to provide best practices and technical assistance to counties in establishing mobility management and engaging local partners.
28	**Transportation Gap or Solution**	Alternative Modes of Travel like taxis: I agree that alternative modes needs to be part of the mix of options available. The program has to be easy and low-tech to participate in. In addition to the list of available tools, what about offering a taxi voucher program? Also, I wanted to raise an example in South Alameda County where there is a large unaccompanied immigrant youth population. They often have to get to legal services based in Oakland. Navigating public transit from Hayward to Oakland for newcomers is very challenging, confusing and cost-prohibitive. If there were a free taxi voucher program available to them through the Hayward Unified School District, that would make it so much easier for them to see their lawyer and get to court to support their asylum case. *Alameda County Public Health Department*	Taxi voucher programs are noted as a solution in Chapter 4 and Appendix E.
29	**Implementation**	Create Mobility Managers and Designate Consolidated Transportation Service Agencies (CTSAs): In the engagement strategies, make sure that MTC is informed by the COC map and other data, and continue to use the stakeholder advisers to ensure MTC is reaching the local community stakeholders that need to be at the table to inform the development of and prioritizing of strategies. *Alameda County Public Health Department*	This can be considered during plan implementation. Staff will make every effort to include Communities of Concern mapping and data, along with other technical and outreach assistance.
30	**Other**	In suburban communities, members of the public have identified the need to better synchronize pedestrian walk signals with the traffic flow, especially at multi-lane intersections that are difficult to cross.	Appendix F identifies the need for promoting walkable communities, complete streets and the integration of transportation land use decision. Staff will make every effort to provide available data in support of local planning.

	Category	Comment/ Commenter	Response
		Some communities like in Hayward near Tennyson High School are bisected by rail roads and there aren't frequent enough rail crossings to notify when a train is approaching. Furthermore, data collection is often challenging or non-existent. This makes planning and advocacy difficult. *Alameda County Public Health Department*	
31	**Funding**	Our agency represents all the transit operators (BART, AC and WestCAT) and local cities in west Contra Costa County, as well as unincorporated west County. Our goal is to plan and fund subregional transportation needs ranging from bike/ped options to major interchange enhancements along the I-80 corridor of west county. As part of these goals, we are closely invested in assuring improved services for senior, disabled and low income residents. To this end, we are just completing a West Co Accessible Transportation Study. Based on the excellent information presented in the MTC Coordinated Plan and the information we gathered specifically on the needs of west county residents, the outstanding issue is dedicated funding. In order to have consistent, long term guaranteed services to meet the growing population of senior/disabled/low income residents, there needs to be a dedicated ongoing funding source beyond the 5310 funds. We feel strongly that new funds from sales tax, driver license fees, and other self-help efforts are not enough. SB1 and RM3 do not address the needs of this most vulnerable population. Money does not solve everything. But local efforts to better coordinate services are evolving and the communication between operators is impressive. Drennen Shelton at MTC does a fabulous job attending the many groups forming to address various ADA and non ADA services. More devotion from one person cannot be found. But we need more dedicated staff at the County level if this Plan is ever to get up on its legs and walk. *West Contra Costa Transportation Advisory Committee*	The issue of funding availability and consistency is noted as a key gap in Chapter 4.

	Category	Comment/ Commenter	Response
32	**Transportation Resources**	Overall, I feel the plan is well presented and filled with doable items in the relatively short term along with long term wishes! Mobility Matters serves as a Mobility Management Center for Contra Costa County and operates two free volunteer driver programs, one for seniors and one for disabled veterans of any age. *Mobility Matters*	Mobility Matters is referenced in Chapter 3.
33	**Transportation Resources**	Page 59: Strategy 6: Improve Mobility for Veterans - In June 2017, Mobility Matters launched a free, volunteer driver program for disabled veterans of any age residing in Contra Costa County who are unable to take other forms of transportation. This program is called Rides 4 Veterans and is built on a model of veterans driving veterans, but non veteran drivers can also help since there are not enough veterans drivers to meet demand. *Mobility Matters*	Mobility Matters and Rides 4 Veterans service are referenced in Chapter 3.
34	**Outreach**	Page 100: Comment from City of San Pablo that there is no volunteer driver program in West County is misleading. Although West County does not operate its own volunteer driver program, both volunteer driver programs run by Mobility Matters serve seniors and disabled veterans in ALL parts of Contra Costa County. We also provide West County residents with the same Transportation I&R Helpline and transportation guides that are provided to Central and East County. *Mobility Matters*	These represent needs that were identified through the outreach process and subsequently documented in Chapter 4 and Appendix C.
35	**Funding**	Develop County-Based Mobility Management: In November 2016, Measure X did not pass with 2/3 majority vote in hopes this funding would expand services and transportation options. Our program which is funded through Measure J does not have additional funding to provide a One Stop Shop to riders outside our service area. Moving forward, there needs to be funding for local agencies to build a Tri Partnership among neighboring agencies proving as a One Stop Ambassador for San Pablo, Richmond, and El Cerrito. Collaboration is needed based on the aging population is expected to double from 35 million nationally in 2000 to 71 million in 2030. In 2014, the cities of	The issue of funding availability is noted as a key gap in Chapter 4. Mobility management is included as a recommended strategy in Chapter 5 as a two-fold solution: to improve the mobility of traditionally underserved groups and to increase the efficiency of the overall system of transportation through coordination.

	Category	Comment/ Commenter	Response
		Richmond, San Pablo and El Cerrito submitted a collaborative grant application for the FTA section 5310. This was a first time collaboration among the three cities and funds was only granted for Travel Training. Although we do meet the needs of most of our ridership, we still have barriers and gaps in our service such as: - Requests for transportation to El Cerrito, Richmond, EL Sobrante, Martinez, Berkeley and Oakland - Some riders (particularly dialysis patients) are too fragile to travel on regular ADA paratransit - Volunteer driving program provided by Mobility Matters only service East and Central County - Increased population for underserved seniors in Contra Costa County - Insufficient funding resources for transportation for seniors and people with disabilities (Measure X) *City of San Pablo*	
36	**Funding**	Regional Transportation Resources: As it states in this draft, there are a number of different transportation resources that low-income populations, seniors, people with disabilities, and veterans can access in the Bay Area. Coordinating all of these mobility management elements will ensure the long term development for all three cities and improve overall service. Funding should not focus just on the traditional fixed routes but include smaller agencies to develop a pre scheduled route service that operates certain days and hours in the week. Proper funding allows us to effectively accomplish our goal by offering convenient, accessible and a time saving collaboration. We are in favor of this draft in hopes it will address the much needed access to transportation services and eliminate some of the barriers and gaps in serving our community. *City of San Pablo*	The issue of funding availability and diversity is noted as a key gap in Chapter 4. Coordination is noted as a strategy in Chapter 5.

	Category	Comment/ Commenter	Response
37	**Transportation Gap or Solution**	MTC should provide funding for and expand the types of eligible projects that provide more flexibility so that innovative projects can be proposed to address long regional paratransit cross county trips and enhancing fixed route service for seniors and people with disabilities. *BART Customer Access and Accessibility*	Project eligibility is determined by requirements of the fund sources. Currently, paratransit service beyond the ADA is eligible under FTA guidance for the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program. The issue of transfers between ADA paratransit providers is noted in Chapter 4, Chapter 5, Appendix B, Appendix C, and Appendix E.
38	**Transportation Gap or Solution**	Improve Regional Paratransit Trips: Long regional paratransit cross county trips with timed meets between transit agencies are costly, time consuming, and difficult for passengers. Improving timed transfers and meet times is a good goal but eligible projects should be expanded to include other options that address the underlying issues. The paratransit requirements for agencies has requirements for transfers between agencies which often are the cause for long trips and passengers being left on their own. There are no specific requirements or mechanizes for interjurisdictional travel beyond transfers. Regional travel is not the primary focus or responsibility of any single agency. MTC could assist in supporting a regional paratransit plan that looks at current travel paths and destinations in support of options for regional trips that are seamless for the passenger. Currently there is no incentive for transit agencies to take passengers past their borders as it is both time consuming, costly and maroons agency vehicles outside of their service area often during the periods of heavy traffic. Strategies could include a single provider to provide regional trips and eliminate transfers. Shared coordination between agencies which focuses on regional or long-haul trips could free up agency vehicles to focus on local trips. These regional vehicles could also provide supplemental local paratransit needs when they are in an area rather than dead-heading back. Also, using fixed route service (like BART, AC Transbay etc) for large sections of regional paratransit trips might be possible if additional assistance or an escort was provided to riders. Currently paratransit shuttles are	This can be considered during plan implementation. The issue of transfers between ADA paratransit providers is noted in Chapter 4, Chapter 5, Appendix B, Appendix C, and Appendix E.

	Category	Comment/ Commenter	Response
		only locally run but a regularly scheduled regional paratransit shuttle service targeting high demand key destination points such as medical centers could be also be a way to provide better service. *BART Customer Access and Accessibility*	
39	**Transportation Gap or Solution**	Enhancing Fixed Route Service for Seniors and People with Disabilities: Fixed route service in the Bay Area is already very accessible but many seniors and persons with disabilities find there are aspects that are so challenging it limits or prevents them from using it and their only option is paratransit. Regional funding is needed for projects that go above the and beyond the minimum ADA requirements to keep more riders on fixed route transit. Technology assistive devices that target seniors and persons with disabilities could be used to help navigate the complex fixed route system. Many of us use apps on our phones but seniors or persons with disabilities may need different strategies, tools or different types of assistance with more personalized directions. As this is a smaller population it funding is needed to assist with getting these options developed. Strategically placed beacons for wayfinding could help guide the blind and low vision through complex transit areas and could assist seniors as well. These types of projects need regional consistency and density to become something that people can rely on. New ways could be developed to alert drivers that seniors need more time to board, get a seat, or help with directions. Staff Escorts/Assistants could be scheduled at key locations to assist with help getting seats, or moving through busy stations. Some riders only need an attendant for part of the trip. What if you could call/schedule for a travel attendant with your phone and have an attendant meet you. Regional pilot projects that are innovative need support and funding to help address the growing needs of the region. *BART Customer Access and Accessibility*	Project eligibility is determined by requirements of the fund sources. Currently, paratransit service beyond the ADA is eligible under FTA guidance for the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program. The need for projects that enhance fixed-route service for seniors and people with disabilities is noted in Appendix C and included in Appendix E.

	Category	Comment/ Commenter	Response
40	**Transportation Resources**	Page 31 – Subsidized Fare Programs / Voucher Programs: The description of existing programs should distinguish between means-based fare programs and subsidies for particular groups, independent of income, like students, veterans, seniors, elderly, etc. Currently, Sonoma County Transit, Santa Rosa CityBus, and Petaluma Transit offer fare free rides for college students and Sonoma County Transit offers fare free rides for veterans. *Sonoma County Transportation Authority (SCTA)*	The plan presents broad definitions of the types of transportation services and programs offered in the Bay Area. Further clarification on program types has been incorporated into Chapter 3.
41	**Regional Strategies for Coordination**	Strategy 4: Means-Based Fare: There is a need to think creatively about including means-based fare programs in areas with a high percentages of riders who would qualify and where transit agencies do not have the financial means to subsidize fares without cutting service. Where it is not financially feasible to have a full means-based fare program, the regional program could support some sort of limited subsidized pass product that is distributed to social service agencies. *Sonoma County Transportation Authority (SCTA)*	Through the Regional Means-Based Fare Study, MTC is working with transit agencies to develop an implementable program and seek funding to support this effort. Program implementation details have not been developed and is pending MTC Commission and transit agency board support to proceed. Comment will be forwarded to the Means-Based Fare Study project.
42	**Transportation Gap or Solution**	To address the Gaps 4 regarding high fare - how can transfer agreements be put in place between paratransit providers and also between paratransit and fixed route providers? An example would be a paratransit trip from Santa Rosa to San Rafael, could include a portion of the trip being completed on SMART. *Santa Rosa CityBus*	The plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be different in a local context. The plan is intended to provide a regional framework, while still allowing each county, city or agency to tailor local solutions, including how transfer and cost sharing agreements are implemented between transit agencies.
43	**Transportation Gap or Solution**	To assist with the spatial gaps, Park-n-rides would increase access to fixed route as well as provide a place for those outside of the paratransit area to get to paratransit. Park-n-ride as a tool don't seem to be mentioned in the Plan. *Santa Rosa CityBus*	Infrastructure projects have been incorporated into Appendix E.

	Category	Comment/ Commenter	Response
44	**Transportation Gap or Solution**	Encourage automatic locations technology for paratransit fleets. It would improve the rider experience, improve transfer experience, reduce no-shows and save staff time – talked about in summary of gaps 8. *Santa Rosa CityBus*	Transit information, including real time information and other capital improvements have been incorporated into Appendix E.
45	**Regional Strategies for Coordination**	Funding for low income passes: If this is important for the region the MTC could identify a funding source that agencies can apply for funding to implement a program. Or identify a certain amount of money and then provide it to the Bay area operators based on population or ridership. If not enough funds are available to fulfill all the needs, maybe just provide it on a first come first serve bases. Or develop a scholarship fund, where applicants can apply for a reduced transit pass for a certain period of time. *Santa Rosa CityBus*	Through the Regional Means-Based Fare Study, MTC is working with transit agencies to develop an implementable program and seek funding to support this effort. Program implementation details have not been developed and is pending MTC Commission and transit agency board support to proceed. Your comment will be forwarded to the Means-Based Fare Study project.
46	**Other**	Chapter 1, Planning Requirements: Will MTC require that other plans and projects be consistent with the CPT-HSTP, or give preference to those that do? *Samtrans*	One purpose of the Coordinated Plan is to identify projects eligible for FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities program. MTC encourages all grant applicants to draw on the information and recommendations presented in the Coordinated Plan to better serve transportation disadvantaged populations.
47	**Regional Strategies for Coordination**	*From Chapter 4: Comments from almost every county in the region raised concerns that transit and paratransit fares are too high for many people. Seniors and families with low incomes are a growing portion of our local demographics, and these groups are some of the least able to afford regional transit options like BART and Caltrain that increase access to medical facilities, jobs, and other critical services.* These are the two most expensive options in the Bay Area. Overlooks more affordable bus service. *Samtrans*	Affordability of transportation, particularly regional transit trips, is noted as a need and solution in Chapter 4. Subsidized transportation services is listed as a strategy in Chapter 5.

	Category	Comment/ Commenter	Response
48	**Regional Strategies for Coordination**	*From Chapter 5: Coordination is essential for meeting the needs of seniors, people with disabilities, veterans, and those with low incomes. To best serve the region's needs for mobility services, partnerships need to involve the entire spectrum of transportation providers: providers of public fixed route transit, human service transportation providers, private taxi and ridehailing services, departments of health and human services, advocacy groups, faith-based groups, medical and dialysis providers and providers of support services to low-income populations, seniors and individuals with disabilities.* *Although presumably included by implication under "providers of public fixed route transit", and not included within the scope of Mobility Management, it would be helpful if this section mentioned ADA paratransit specifically in some way, since many in the community tend to view it as a standalone service.* *Samtrans*	Paratransit has been incorporated into Chapter 5.
49	**Regional Strategies for Coordination**	*From Chapter 5: Address Access to Healthcare…costs are particularly burdensome for ADA paratransit providers who provide subscription trips to individuals requiring dialysis. ADA paratransit providers receive no financial contribution from the clinics whose clients receive these services. MTC could bring the parties together to arrive at cost sharing arrangements that would exceed the fare paid by riders.* *For-profit dialysis businesses have very little incentive to "share" the cost of their customers' transportation, given the requirement that ADA paratransit operators provide those trips without capacity constraints.* *Samtrans*	MTC will consider how best to initiate conversations between parties to explore cost sharing arrangements, reduce travel costs and expand travel options.
50	**Regional Strategies for Coordination**	*From Chapter 5: Piloting trip-screening modules in scheduling software to facilitate the implementation of conditional eligibility policies. Funding for this technology can be prioritized, and can assist in coordinating the phased development of a regional database of accessible bus stops to inform trip-screening.*	This can be considered during plan implementation.

	Category	Comment/ Commenter	Response
		The biggest single obstacle to implementing meaningful conditional eligibility enforcement is the lack of GIS data. Assistance from MTC in developing the necessary databases would be extremely helpful. *Samtrans*	
51	**Regional Strategies for Coordination**	*From Chapter 5: Make it Easier to Pay for Paratransit Without contributing to the cost of providing ADA paratransit, operators can provide seamless paratransit payment options for passengers. The cost of on-vehicle card readers necessary for the use of Clipper cards is prohibitive given the relative lower volume of trips provided on paratransit as compared to fixed-route.* The fact that the cost for onboard clipper readers is "prohibitive" suggests that this initiative could contribute substantially to the overall cost of providing paratransit. *Samtrans*	As noted in Chapter 5, Clipper 2.0 may be able to include paratransit as a parameter in the new system. Other solutions may be available using current technology, such as a system in which payment for the trip is secured upon booking, and processed upon taking the trip.
52	**Regional Strategies for Coordination**	*Riders can pre-load funds for paratransit rides onto their Access Rider ID/TAP card. At boarding time, the driver can then swipe their card, and the fare will be deducted automatically from the rider's Access Rider ID/TAP card account balance.* What on-vehicle equipment is needed to process fare payments via TAP card? *Samtrans*	As noted in Chapter 5, Clipper 2.0 may be able to include paratransit as a parameter in the new system, and may or may not require on-vehicle equipment. Other solutions may be available using current technology, such as a system in which payment for the trip is secured upon booking, and processed upon taking the trip.
53	**Regional Strategies for Coordination**	*From Chapter 5: To address the growing costs of transportation to healthcare in the Bay Area, paratransit providers can implement Medi-Cal cost recovery programs. Recovered costs could be put back into the paratransit system, or used to fund less expensive non-ADA services.* If this cost recovery practice were widely adopted, what is the likelihood that Medi-Cal would change the rules for reimbursement? Our understanding is that Medi-Cal must approve trips before they are provided, in order for the trips to be eligible for reimbursement. While this might be relatively straightforward	The plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be different in a local context. Implications and outcomes of seeing Medi-Cal cost recovery will need to be further explored during implementation.

	Category	Comment/ Commenter	Response
		in the case of subscription or standing-order paratransit trips, pre-approval could be exceedingly difficult in the case of same-day or next-day demand-responsive trips. *Samtrans*	
54	**Regional Strategies for Coordination**	*From Chapter 5: Paratransit users and operators alike see benefits in expanding options for same-day trips. Same-day trip programs provide greater mobility options and flexibility to riders, and operators may realize cost savings through innovative partnerships.* The document refers to city-based programs. How would this apply to countywide transit operators? While independent "non-ADA" ride-hailing or taxi based programs would be of great benefit to the users, listing this item under "*Strategy 2: Improve Paratransit*" creates the impression that MTC is requiring or encouraging ADA paratransit operators to provide same-day ADA paratransit service – including the prohibition against capacity constraints. We suggest moving it to another section for clarity's sake. *Samtrans*	This section is not necessarily referring to city-based programs. The plan is intended to provide a regional framework, while still allowing each county, city or agency to tailor local solutions, including services beyond the ADA. Further, the plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be different in a local context.
55	**Regional Strategies for Coordination**	*From Chapter 5: Convene Task Force to Assist Implementation of In-Person Eligibility MTC can use its position as a regional resource to convene a task force to assist in the implementation of in-person eligibility and functional testing procedures at each of the region's transit operators that do not currently use this eligibility model. This effort can increase the effectiveness of new funding made available to regional operators for the implementation of county-based mobility management.* Is MTC proposing a regional eligibility contract or MOU? *Samtrans*	MTC is not proposing a contract or an MOU. The plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be different in a local context.
56	**Regional Strategies for Coordination**	*Strategy 3: Increase suburban mobility options. New and expanded transportation solutions are needed for addressing mobility challenges that result from the suburbanization of poverty and older adults. Suburban development patterns are*	The plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be different in a local context. Some suburban areas are

	Category	Comment/ Commenter	Response
		characterized by medium- and low-density land uses, which are often incompatible with traditional fixed-route transit service. Flexible, demand responsive solutions are necessary to provide mobility in these areas. Privately operated demand responsive service depends on a critical mass of business (ridership) in order to be sustainable. The same land use issues that make fixed route bus service too inefficient to be sustainable in the suburbs also make it hard to get a cab. If they don't have enough business to stay busy all the time, cab/TNC drivers will choose not to provide this service. *Samtrans*	experimenting with TNC projects and the region hopes to learn from these projects.
57	**Regional Strategies for Coordination**	*From Chapter 5: Fund Low-Income Vehicle Programs. MTC and County transportation and transit agencies should prioritize and fund low-income vehicle loan programs for individuals whose typical trip patterns render transit not an option.* This recommendation appears to run counter to efforts to promote public transit as an attractive option and decrease the prevalence of single-occupancy vehicles. If the intent is to address the needs of low income people in rural areas, or of graveyard-shift workers who must commute during hours when no bus service is provided, that should be stated clearly. From the Peninsula Family Services DriveForward website: *"Life is infinitely more challenging when you must rely solely on public transportation; commutes become longer, errands more difficult, and arriving on time to work or school nearly impossible."* *Samtrans*	New and expanded transportation solutions are needed for addressing mobility challenges that result from the suburbanization of poverty. Solutions beyond fixed-route bus service are presented in recognition that a diversity of transportation solutions are needed.
58	**Regional Strategies for Coordination**	Means-based fares: How will this affect compliance with standards for farebox recovery ratio? *Samtrans*	This concern has been raised by transit agencies through the Regional Means-Based Fare Study. The impacts of a means-based fare program on farebox recovery is not currently known. MTC will continue to discuss and address this issue with transit agencies if a regional means-based fare program is implemented.

	Category	Comment/ Commenter	Response
59	**Regional Strategies for Coordination**	*From Chapter 5: Advocate for the Accessibility of Emerging Shared Mobility Solutions and Autonomous Vehicles Shared mobility solutions, such as bikeshare, carshare, ride-hailing, and microtransit are options available to the public today. Most shared mobility providers are private entities, and as such may or may not prioritize service to traditionally underserved groups.* Unlikely without enforceable regulation, both in terms of ADA and Title VI. Most successful examples from the taxi industry require both significant incentives and severe coercive measures. *Samtrans*	Comment noted. Further examination of needs, opportunities, and constraints will be undertaken during implementation.
60	**Veterans Transportation**	Many non-veterans have the same needs as veterans. This need could better be addressed at the federal level, by creating a VA transportation program. *Samtrans*	Veterans are included in this plan as a response to the growing veteran population and their transportation needs in the region. The FTA has occasionally issued funding opportunities to address veterans' transportation needs. MTC will continue to seek and advocate for funding.
61	**Implementation**	Ranking the recommendations or some direct statement about the importance of each would also be helpful. *Samtrans*	The plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be weighted differently in a local context. Prioritization of the recommendations will be considered during implementation.
62	**Funding**	Related to Appendix E (premium services on ADA paratransit including but not limited to service beyond ¾ mile and fixed-route transit times and days; same-day service), can this funding be used to support existing service where the ADA paratransit provider already exceeds the time and distance requirements? *Samtrans*	Project eligibility is determined by requirements of the fund sources. Currently, paratransit service beyond the ADA is eligible under FTA guidance for the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program.

	Category	Comment/ Commenter	Response
63	**Projects Eligible for Funding**	*Related to Appendix E, are "Group trips (e.g. grocery shopping trips)"* compatible with the rules against providing charters? *Samtrans*	Project eligibility is determined by requirements of the fund sources. Currently, group trips are eligible under FTA guidance for the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program, and are typically provided under city-based services and nonprofit providers. Transit operators should continue to abide by applicable charter rules.
64	**Funding**	Related to Appendix E, "Improved performance and service quality measurement, including increased rider participation", is this limited to increasing rider participation, or could funding be used for data reporting tools and other technical improvements? *Samtrans*	Project eligibility is determined by requirements of the fund sources. Currently, some technological improvements are eligible under FTA guidance for the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program.
65	**Regional Strategies for Coordination**	Strategy 1: County-Based Mobility Management. We agree that MTC should continue to award extra points to projects and proposals that address cross-county or regional connections and that MTC should provide a venue for inter-agency coordination. What are the current venues and is MTC staff able to provide grant-specific support that brings potential collaborators together before a call for projects? *Marin Transit*	MTC provides technical assistance during calls for projects, and will continue to support regional coordination.
66	**Regional Strategies for Coordination**	Strategy 1: County-Based Mobility Management. Partners regularly participate in informal collaboration meetings, including the Bay Area Regional Mobility Management Group and BAPAC (Bay Area Partnership for Accessibility working group). We encourage MTC to recognize and leverage the informal coordination which already exists. *Marin Transit*	This can be considered during plan implementation.
67	**Funding**	Strategy 2: Improve Paratransit. Recommendation for partners to take opportunities to expand subsidized same-day trip programs: The draft plan recognizes that veterans and those with low incomes will likely not benefit from these programs, typically supported by local sales taxes. Does MTC foresee that counties will receive support through 5310 or other funding streams to	Project eligibility is determined by requirements of the fund sources. MTC and local agencies can evaluate the use of fund sources for this purpose as implementation efforts progress with consideration of impacts on other priorities.

	Category	Comment/ Commenter	Response
		supplement/bolster programs and include these groups or is the draft plan recommending that partners proceed with implementing these programs without funding for additional groups? *Marin Transit*	
68	**Regional Strategies for Coordination**	Strategy 2: Improve Paratransit. Recommendation for partners to implement Medi-Cal Cost Recovery Program: It is our understanding that establishing a Medi-Cal cost recovery program is a complex process that requires a considerable amount of staff time. Smaller transit agencies would require significant technical assistance. *Marin Transit*	This can be considered during plan implementation.
69	**Regional Strategies for Coordination**	Strategy 3: Provide Mobility Solutions to Suburban Areas. As emphasized in the draft plan, today's older adults are expected to stay healthy longer, with almost no growth expected in the portion of the population that is disabled. This is especially true in Marin County where we have the highest percent of seniors in the region but are below average in percent living with a disability, living in poverty, and without access to a vehicle. To provide this population with attractive mobility options beyond driving, we will require MTC's support in developing and piloting innovative, accessible, and equitable solutions beyond traditional fixed route transit and ADA-mandated paratransit. We commend MTC for including direction in this spirit among its key recommendations and look forward to a fruitful partnership that encourages innovation and flexibility. *Marin Transit*	This can be considered during plan implementation.
70	**Regional Strategies for Coordination**	Strategy 3: Provide Mobility Solutions to Suburban Areas. Recommendation for partners to prioritize one-click systems: We are committed to increasing access to information and encouraging coordination, however, it is a risk for small transit agencies to invest in software and development of one-click systems that may become obsolete or will be incompatible with regional partners. MTC can help provide guidance and support towards a cost-effective uniform regional solution. *Marin Transit*	This can be considered during plan implementation.

	Category	Comment/ Commenter	Response
71	**Regional Strategies for Coordination**	Strategy 4: Means-Based Fares. Poverty has risen faster in suburban than urban areas of the nine counties. In Marin County this contributes to an increasing income equality gap among residents. Our local funds support only a sub-set of low-income riders. Marin Transit supports regional efforts that will aid local efforts in establishing and funding an equitable means-based fare program where those operators that have already implemented some form of low income fare are recognized and are eligible to participate in a regional program. *Marin Transit*	Through the Regional Means-Based Fare Study, MTC is working with transit agencies to develop an implementable program and seek funding to support this effort. Program implementation details have not been developed and is pending MTC Commission and transit agency board support to proceed. Comment will be forwarded to the Means-Based Fare Study project.
72	**Regional Strategies for Coordination**	Strategy 5: Shared and Future Mobility Opportunities (pending Commission direction). We encourage the Commission to adopt the strategy in the Draft Plan and apply public transit's focus on equity and accessibility to shared mobility. The Draft Plan outlines a number of promising ways to ensure access to private shared mobility providers and their future driverless products. *Marin Transit*	This can be considered during plan implementation.
73	**Outreach**	Concerned about how South Santa Clara County was not engaged for input to this study except through VTA advisory committee. The level of stakeholder input was quite limited. For Santa Clara County, where are the City Senior Centers and organizations that were stakeholders during Measure B such as Transit Justice Alliance? *City of Morgan Hill*	Input from Santa Clara County was provided from a range of stakeholders, including the MTC Policy Advisory Council Equity and Access Subcommittee, the Bay Area Partnership Accessibility Committee, Home First Santa Clara, VTA Committee for Transit Accessibility, and through the Coordinated Plan Technical Advisory Committee.
74	**Regional Strategies for Coordination**	Strategy 3 for Mobility solutions for Suburban Areas is insufficient to address transportation issues in suburban areas especially the South Santa Clara County. We suggest that Strategy 1 be expanded to include specific support for suburban areas through local extension of the Countywide Mobility Manager that is proposed. We believe that would offer an opportunity for greater impact than what is suggested in Strategy 3. *City of Morgan Hill*	The strategy to implement county-based mobility management is intended to provide a regional framework, while still allowing each county to tailor local solutions, including how to fund agencies. Further, the plan presents general and preliminary guidance for regional prioritization, and recognizes that solutions may be weighted differently in a local context.

	Category	Comment/ Commenter	Response
75	**Other**	By study admission, South Santa Clara County workers are resolved to being automobile dependent, with "best practices" including low cost loans for lower income families to purchase a car and insurance". This is in contrast to the ABAG Priority Development Area (PDA) policies which have located affordable and dense housing near transit lines and centers in south County to produce transportation mode-split opportunities. *City of Morgan Hill*	New and expanded transportation solutions are needed for addressing mobility challenges that result from the suburbanization of poverty. Solutions beyond fixed-route bus service are presented in recognition that a diversity of transportation solutions are needed.
76	**Transportation Resources**	Morgan Hill and South Santa Clara County is served by numerous long-haul corporate shuttles. *City of Morgan Hill*	Community-based shuttles, including employment based shuttles, are noted included in Chapter 3.
77	**Transportation Gap or Solution**	Note in the study that economic development in South Santa Clara County is heavily industrial/manufacturing employing people in good jobs, but not jobs which pay enough to allow the employee to live in this county, therefore more are auto dependent. *City of Morgan Hill*	The issue of poverty growth in suburban areas is noted in Chapter 2 and providing mobility solutions to suburban areas is listed in Chapter 5.
78	**Transportation Gap or Solution**	Gilroy and Morgan Hill are not wealthy cities which can invest in their own transit options, and therefore rely on public transit agency investment. *City of Morgan Hill*	Improvements to public transit service and access is noted in Chapter 4 and Appendix E.
79	**Transportation Gap or Solution**	Investment in transit, not disinvestment should be a South County priority to connect people to jobs and services, and reduce congestion on the freeways. *City of Morgan Hill*	Improvements to public transit service and access is noted in Chapter 4 and Appendix E.
80	**Transportation Gap or Solution**	It should be a priority that Caltrain services shuttle to and from South County during the day, not just north in the morning and south in the evening promoting transit use and access to jobs and services. *City of Morgan Hill*	Improvements to public transit service and access is noted in Chapter 4 and Appendix E.
81	**Funding**	With reference to mobility management the plan encourages formation of Consolidated Transportation Service Agencies (CTSA). Other regions are able to sustain these agencies with funding from TDA section 4.5 funding. I think CTSAs are a good thing. I just didn't see a clear way to fund the agencies. *Tighe Boyle*	The strategy to implement county-based mobility management is intended to provide a regional framework, while still allowing each county to tailor local solutions, including how to fund agencies.

	Category	Comment/ Commenter	Response
82	**Regional Strategies for Coordination**	I totally support Strategy 1: County based mobility management. I would like to see an official government group bringing community managers together. Currently a group (Regional Mobility Management Group) meets quarterly exchange ideas and information. I would like to see something more formal that would assist in inter-county coordination from a mobility management perspective. *Tighe Boyle*	This can be considered during plan implementation.
83	**Transportation Gap or Solution**	Travel training should be available for all transportation services, not just fixed-route public transit. *Sonoma Access Coordinated Transportation Services*	Incorporated into Chapter 4 and Appendix E.
84	**Transportation Gap or Solution**	Reimbursement vouchers should be made available on all modes of transportation. *Sonoma Access Coordinated Transportation Services*	Affordability of transportation is noted as a need and solution in Chapter 4. Subsidized transportation services is listed as a strategy in Chapter 5.
85	**Veterans Transportation**	Sonoma County veterans face particular challenges in taking public transit to the VA hospital in San Francisco. *Sonoma Access Coordinated Transportation Services*	Healthcare access is noted as a need in Chapter 4 and improving mobility for veterans is listed in Chapter 5.
86	**Transportation Gap or Solution**	Transfer agreements and easier connections between ADA-paratransit and fixed route transit should be established. *Sonoma Access Coordinated Transportation Services*	Noted as a need in Chapter 4 and Appendix E.
87	**Transportation Gap or Solution**	Park and Ride lots are a good tool for providing access to paratransit services, and should be listed under as a need for the region. *Sonoma Access Coordinated Transportation Services*	Infrastructure projects have been incorporated into Appendix E.
88	**Transportation Gap or Solution**	We appreciate the incorporation of emerging mobility services, and agree they provide an opportunity to innovate the way mobility services are provided to low income users, seniors, people with disabilities, and veterans. For a more robust snapshot of what is available, we recommend incorporating a discussion of available services beyond ridesharing and ride hailing, for example mictrotransit services such as Chariot. *San Francisco County Transportation Authority*	Reference to microtransit has been incorporated into Chapter 3, and is noted in Chapter 5.

	Category	Comment/ Commenter	Response
89	**Transportation Gap or Solution**	As the Coordinated Plan indicates, it is currently a challenge to ensure physical accessibility of shared or hailed vehicles. We recommend addressing additional equity-related concerns such as gaps in technology for users (e.g. access to a smart phone) and the need to make mobility services available for those without access to credit cards or other banking services. *San Francisco County Transportation Authority*	References to additional equity-related concerns have been incorporated into Chapter 5.
90	**Regional Strategies for Coordination**	On July 25, 2017, our Board adopted Guiding Principles for Management of Emerging Mobility Services and Technologies. We encourage you to review these principles and incorporate them into the Coordinated Plan. At our December 12, 2017 meeting, we released a new report that could serve as an additional reference, entitled "The TNC Regulatory Landscape – An Overview of Current TNC Regulation in California and Across the County." *San Francisco County Transportation Authority*	SFCTA's Guiding Principles have been incorporated into Chapter 5 as a best practice.
91	Other	We suggest making the final report available in full page version for electronic viewing, as it is difficult to read the double-pane report on standard page size. *San Francisco County Transportation Authority*	Noted. Staff will make every effort to ensure a more readable electronic version is posted.
92	Other	Throughout, the Coordinated Plan should distinguish between ridesharing (defined as carpool matching platforms where drivers are paired with riders who share similar destinations as them and are not fare motivated e.g. Waze Carpool and Scoop) and ridehailing (defined as platforms which connect fare-motivated drivers with riders similar to taxi services e.g. Uber and Lyft). *San Francisco County Transportation Authority*	The Coordinated Plan defines ride-hailing as services that are often demand-responsive and initiated and paid for by the rider, most typically taxis and TNCs like Uber and Lyft. Ridesharing services such as Waze Carpool and Scoop are not discussed in the plan.
93	Transportation Resources	Consider including an appendix cataloguing the different mobility services MTC researched that are available for the targeted population. Useful examples are provided in Chapter 3 such as the Palo Alto Shuttle, the Monument Shuttle in Concord, the Lamorinda Spirit Van, and the Emeryville Emery Go-Round). This would serve as a valuable resource that describes the breadth of services provided in each jurisdiction all in one place. *San Francisco County Transportation Authority*	Guided by the Coordinated Plan Technical Advisory Committee and stakeholder feedback, staff opted for providing a chapter on the types of transportation services available to the plan's target population, rather than an exhaustive inventory of services than would quickly become outdated.

	Category	Comment/ Commenter	Response
94	Outreach	We appreciate the extensive outreach that has been conducted to develop this plan and encourage additional outreach to emerging mobility companies about this plan if it hasn't happened already. *San Francisco County Transportation Authority*	Outreach for the Coordinated Plan focused on transportation-disadvantaged individuals, advocates, organizations and agencies. We did not conduct outreach to providers of private transportation.
95	Bay Area Demographics	Ch 2 - The fourth key finding bullet point on page 9 indicates that San Francisco is an outlier and that there is a need to allocate additional resources to infrastructure that supports transit and multi-modal mobility since the share of no-car households increased since 2000. Rather than demonstrating as a city we aren't investing enough in transit and multi-modal mobility, we actually see this as a success - more people are able to go without a car since there are so many non-auto resources available (Transit First policies and a robust paratransit program). And, the report doesn't adequately acknowledge the significant proliferation of ride-hailing and other technology services in San Francisco that are attracting and enabling so many households that choose to not own a car. We request revising this key finding as follows to simply call out the trend or key data point and not point to strategies, which is the case for almost all of the other key findings. "San Francisco is an outliner. It is the most urban of all counties, with the greatest density of transit services, and has the highest percentage of residents without access to a vehicle. As of 2012, San Francisco was the fifth most carfree city in the county, a much higher ranking than in 2000." *San Francisco County Transportation Authority*	Changes to this section have been incorporated.
96	Bay Area Demographics	Ch 2 - Based on latest data shown in the figures, the fifth key finding that "San Francisco has one of the highest percentages of people living in poverty and people living with a disability" does not appear to reflect the actual data (for poverty it is 25% or rank 4 tied with Alameda and for disability it is 10% or rank 5 tied with Alameda). We suggest deleting this text or replace it with another San Francisco key finding such as: "San Francisco has the highest percentage of seniors living in poverty." *San Francisco County Transportation Authority*	These changes have been incorporated.

	Category	Comment/ Commenter	Response
97	Bay Area Demographics	Ch 2 - We suggest adding additional context that the household income needed to afford housing varies across the region, so defining low income flatly as 200% of the federal poverty line may underrepresent those experiencing poverty conditions in high-cost areas such as San Francisco and the Peninsula. *San Francisco County Transportation Authority*	MTC uses 200 percent of the federal poverty line to assess poverty rates in many contexts, including in Plan Bay Area 2040.
98	Bay Area Demographics	Ch 2 - On Page 14, in "Poverty - Trends" section, there is a statement - "Almost a quarter of seniors living in San Francisco are living in poverty". However, Figure 2.6 shows that the percent is 36% which is well over a third. *San Francisco County Transportation Authority*	This correction has been incorporated.
99	Bay Area Demographics	Ch 2 - On page 18, in "Access to Vehicles - Current Conditions," there is mention of both "senior household" and "households with senior at head." Please clarify what a "senior household" is if it is different than a household with a senior at head. If both phrases refer to the same population, please adjust the intro sentences - "For senior household, it is 15 percent. For households with a senior at the head, this number is closer to 1 in 10". *San Francisco County Transportation Authority*	The second reference has been deleted.
100	Transportation Resources	Ch 3 - The illustration provided on page 25 presents taxis and ridesharing but should say "taxis and ridehailing". *San Francisco County Transportation Authority*	This correction has been incorporated.
101	Transportation Resources	Ch 3 - In addition to TNCs as private transportation options filling accessibility gaps for seniors and disabled people, we encourage MTC to study microtransit/private transit vehicle services such as Chariot to perform similar services. *San Francisco County Transportation Authority*	Reference to microtransit has been incorporated into Chapter 3, and is noted in Chapter 5.
102	Transportation Gap or Solution	Ch 3 - When considering barriers to private transportation services, particularly those driven by mobile applications, please include access to a smart phone, 508 compliance of mobile applications, and how to serve people without access to credit or banking services (unbanked). *San Francisco County Transportation Authority*	References to additional equity-related concerns have been incorporated into Chapter 5.

	Category	Comment/ Commenter	Response
103	Transportation Gap or Solution	Ch 4 - We appreciate seeing the mention of temporal gaps. San Francisco's Late Night Transportation Study found that late-night and early-morning commuters are disproportionately low-income compared to daytime commuters, and we suggest noting the importance of providing travel options during these gaps in terms of providing access to employment opportunities for low-income workers. *San Francisco County Transportation Authority*	To reveal top transportation gaps in the Bay Area, outreach was conducted and comments were collected. Temporal gaps, of all kinds, were cited as a top gap, and is reflected as such in Chapter 4.
104	Transportation Gap or Solution	Ch 4 - Feedback by County: In looking at the list of feedback comments, San Francisco participants also were concerned with Information and Referral Services, which should be reflected in the summary. *San Francisco County Transportation Authority*	A reference to the lack of transportation information and referral has been incorporated into Chapter 4.
105	Transportation Gap or Solution	Ch 4 - We appreciate the gaps identified so far and suggest an additional gap of access to technology. Low income and senior residents may be less likely to have access to a smartphone, and therefore lack access to emerging mobility services and technologies such as ridesharing, ridehailing, and bikesharing. *San Francisco County Transportation Authority*	Access to technology was not cited as a transportation gap through the plan's outreach efforts. However, references to smartphone requirements for emerging mobility services has been incorporated into Chapter 5.
106	Regional Strategies for Coordination	Ch 5 - Shared and future mobility: We agree with MTC's position to advocate for emerging mobility services and technologies to ensure equity and accessibility of these shared services. The Transportation Authority has adopted ten guiding principles for emerging mobility services and technologies, and we recommend incorporating these as appropriate into the Coordinated Plan. *San Francisco County Transportation Authority*	SFCTA's Guiding Principles have been incorporated into Chapter 5 as a best practice.
107	Regional Strategies for Coordination	Ch 5 - Thank you for providing examples of best practices, which is a significant enhancement to prior drafts. *San Francisco County Transportation Authority*	Comment noted.
108	Regional Strategies for Coordination	Strategy 2 - We recommend including: Make paratransit more flexible by allowing customers to book and cancel trips more easily, and with less time restrictions, based on their needs. *San Francisco County Transportation Authority*	The strategies presented in Chapter 5 are big picture initiatives, and are not meant to be an exhaustive list. The recommendations in Strategy 2 are intended to improve paratransit without raising costs.

	Category	Comment/ Commenter	Response
109	Regional Strategies for Coordination	Strategy 2 we recommend including: Modernize ride reservations to allow customers to book and pay for trips in advance online. We are proposing that this service be added to any call-in reservation process. *San Francisco County Transportation Authority*	The strategies presented in Chapter 5 are big picture initiatives, and are not meant to be an exhaustive list. The recommendations in Strategy 2 are intended to improve paratransit without raising costs.
110	Regional Strategies for Coordination	Strategy 2 we recommend including: Encourage agencies to minimize the window of time when a paratransit vehicle may arrive. We recognize that this strategy, in particular, has to be considered in concert with associated cost implications. *San Francisco County Transportation Authority*	The strategies presented in Chapter 5 are big picture initiatives, and are not meant to be an exhaustive list. The recommendations in Strategy 2 are intended to improve paratransit without raising costs.
111	Regional Strategies for Coordination	Strategy 2 we recommend including: Encourage agencies to provide call-in and online real-time arrival information. *San Francisco County Transportation Authority*	This is included in the strategy as "Promoting the use of Interactive Voice Response (IVR) systems to remind passengers of upcoming trips and communicate imminent arrival."
112	Regional Strategies for Coordination	Strategy 2 we recommend including: Allow customers to rate rides and provide feedback so that agencies can better assess performance and customer needs and satisfaction. *San Francisco County Transportation Authority*	The strategies presented in Chapter 5 are big picture initiatives, and are not meant to be an exhaustive list. The recommendations in Strategy 2 are intended to improve paratransit without raising costs.
113	Regional Strategies for Coordination	Strategy 5 - Shared and Future Mobility Opportunities: It would be great to see San Francisco's work to develop and implement guiding principles included as a best practice. *San Francisco County Transportation Authority*	SFCTA's Guiding Principles have been incorporated into Chapter 5 as a best practice.
114	Regional Strategies for Coordination	Strategy 6 - Improve Mobility for Veterans: We encourage MTC to recommend a feedback service to allow agencies to assess veterans' needs and satisfaction. *San Francisco County Transportation Authority*	This can be considered during implementation.
115	Transportation Gap or Solution	We recommend a clearer strategy for addressing temporal gaps in transit service, which we have found to be of particular importance to low income workers and while presenting a funding challenge for operators given relatively lower ridership at off-peak hours. *San Francisco County Transportation Authority*	The strategies presented in Chapter 5 are big picture initiatives for the region, and are not meant to be an exhaustive list of solutions to gaps.

|	Category	Comment/ Commenter	Response
116	Other	We appreciate the strategies included in Appendix F to promote walkable communities, but suggest providing more robust strategies for improving pedestrian and bicycle mobility as part of this chapter as well. *San Francisco County Transportation Authority*	Pedestrian and sidewalk right-of-ways, bicycles lanes and other safety improvements for pedestrian and cyclists are discussed in Chapter 3.
117	Projects Eligible for Funding	In Figure E.1, please indicate which project types are eligible for the FTA 5310 funds, 5311 funds, and the other fund sources encompassed in MTC's regional competitive funds (e.g. STA Population funds). *San Francisco County Transportation Authority*	Appendix E includes a list of eligible projects for the FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program. Project eligibility for other fund sources is not included.
118	Projects Eligible for Funding	In Appendix E, please acknowledge the significant role that local funds play in funding these project types to meet the needs of the targeted users. Federal funds continue to be a shrinking resource, and we must rely more heavily on self-help from local, regional, and state sources. *San Francisco County Transportation Authority*	Appendix E includes a list of eligible projects for the FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program. This appendix does not include project eligibility requirements, including local matching fund rates. The issue of funding availability and consistency is noted as a key gap in Chapter 4.
119	Projects Eligible for Funding	In Appendix E, please acknowledge the difficulty in identifying funds, particularly a sustainable source of funds, for operating projects (e.g. education, training, service operations) and fare subsidies (e.g. low income transit pass), since most grant programs focus on capital infrastructure. *San Francisco County Transportation Authority*	Appendix E includes a list of eligible projects for the FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program, and does not provide information on other fund sources or requirements. The issue of funding availability and inconsistency of grant-based funding is noted as a key gap in Chapter 4.
120	Other	Appendix F does not seem to include recommendations for the integration of transportation and land use decisions to improve needs of low-income people, seniors and people with disabilities. Please either re-title the section to exclude "Integration of Transportation and Land Use Decisions" or add an example such as strategies to link transportation resources to the production of affordable housing. *San Francisco County Transportation Authority*	Changes to Appendix F have been incorporated.

The Board of Supervisors
County Administration Building
651 Pine Street, Room 106
Martinez, California 94553

**Contra
Costa
County**

John Gioia, 1st District
Candace Andersen, 2nd District
Diane Burgis, 3rd District
Karen Mitchoff, 4th District
Federal D. Glover, 5th District

January 9, 2018

Jake Mackenzie, Chair
Metropolitan Transportation Commission
375 Beale St #800
San Francisco, CA 94105

Subject: Comments on the Metropolitan Transportation Commission's November 2017 Draft
Coordinated Public Transit-Human Services Transportation Plan.

Dear Chair Mackenzie:

On behalf of the Contra Costa County Board of Supervisors, I am writing to provide comments on the
Metropolitan Transportation Commission's (MTC's) November 2017 Draft Coordinated Public Transit-
Human Services Transportation Plan (Plan). The Plan addresses the mobility needs of seniors, people
with disabilities, people with low-incomes, and veterans including strategies to guide MTC's efforts over
the next four years.

The County is particularly pleased to provide input in light of your poignant comments at the opening of
the October 25th MTC Board meeting relative to the North Bay wildfires. This plan will help to increase
resources and improve services to the population that, in your words "...*were not able to move rapidly
and swiftly*." We applaud you for highlighting this issue and thank MTC for the effort in developing the
Plan which should act as a call to action. As accurately documented in the Plan, the segment of
transportation system serving this population requires substantially more resources and attention. Without
such attention, this population will not equitably benefit in the substantial improvements seen in the
transportation system at large. We provide the following the comments in this light, the target population
is deserving not merely of incremental improvements but fundamental advances.

The strategy, "Improve Paratransit" includes the action to "...*make it easier to pay for ADA paratransit
service*". The County appreciates the Plan including this concept; it highlights the critical accounting
component of an effective mobility management operation. Too often, superficial discussions on how to
improve paratransit focus on transportation operations (e.g. transportation network companies) or other
emerging technologies as "silver bullets". In reality, solutions are often much more mundane requiring the
establishment of relatively complex processes as described in this section of the Plan. The accounting
function is vital, as a full service mobility management operation can act as a funding aggregator on
behalf of the client and other disparate public agencies. This aggregation can reduce costs, increase
efficiency and improve service to the target population. Considering the array of agencies (and associated
funding streams) that can potentially contribute to this type of service, this is no small matter.

We also appreciate the comprehensive discussion regarding transfer trips. Too often, plans and studies superficially cover the topic of transfers on paratransit service. This leaves the reader to assume they are similar to transfers on fixed route transit, that is to say they are relatively innocuous procedures. As the Plan accurately points out, this is far from the case; transfer trips are much more disruptive to productivity in a demand response environment. However, one critical issue is left unaddressed in the transfer discussion, that of *safety*. Boarding and alighting are the most common times that injuries occur[1]. Increases in transfers unavoidably decrease passenger safety. This decrease in safety as a result of transfer trips, accompanied by the sensitivity of the client population, magnifies the need for public agencies to do everything in their power to reduce the number of transfers. With five transit operators in Contra Costa County this is no small issue. We request that this additional safety information be included in order to have a complete and accurate discussion regarding transfers. Contra Costa County is not alone having multiple transit operators, a more comprehensive discussion would be a benefit to the entire Bay Area.

The Plan includes several references to a "Roadmap Study" which includes recommendations for mobility management programs. Can you please include this Study as an appendix to the Plan; it does not appear to have been widely distributed. From the description, it sounds like a valuable resource for counties that are considering the establishment of a countywide mobility management system.

The County applauds MTC for providing a focused implementation timeline including the initial strategy of recognizing mobility management as a regional priority. We also appreciate the candid statement in the plan, "*Current senior-oriented mobility services do not have the capacity to handle the increase in people over 65 years of age...*" The County believes the strategies in the Plan should be correspondingly explicit.

The Plan provides excellent background on the efforts at the federal and state level to increase coordination of paratransit services. The County believes the Plan should consider the impact of these efforts, whether or not they are adequate, and if we can achieve more. The United States Government Accountability Office has produced reports for decades highlighting the lack of progress in this field and the limitations of coordination. Limitations relative to coordination are not unique to public transit - human services transportation. The well-regarded public policy book, *Implementation: How Great Expectations in Washington Are Dashed in Oakland...*, broadly describes these limitations as follows, "*...invocation of coordination does not necessarily provide either a statement of or a solution to the problem, but it may be a way of avoiding both when an accurate prescription would be too painful.*"

A more "accurate prescription" in the case of paratransit would be examining the system itself. This is in contrast to coordination efforts, which are often an attempt to make the existing system work through incremental modifications. We are not writing in opposition to coordination; it can be a critical first step in improving service. However, it is often just a first step; it should be the baseline condition on which strategies that are more impactful can be considered and implemented.

The Plan briefly touches on more impactful approaches in discussing Consolidated Transportation Service Agencies, one-call/one-click operations, and the wide spectrum transportation provider types. Explicitly discussing the topic of consolidation of services (e.g. eligibility, maintenance, financial services, scheduling/dispatch, and transportation operations) and the various methods of doing so (e.g. non-profit, administrative vs. full-service brokerage) would provide a more complete discussion and increase the usefulness of the document. The recent report from the Federal Transit Administration, "*Accessible Transit Services for All*", contains a discussion of options.

---

[1] University of Louisville, Rehabilitation Engineering Research Center, "*Wheelchair Rider Incidents on Public Transit Buses: A 4-Year Retrospective Review of Metropolitan Transit Agency Records*"

The Bay Area has made great strides in our transportation system, due in part to the leadership of MTC. The freeway system is experiencing system wide improvements with the implementation of express lane program, the FasTrak and Clipper systems provide much needed convenience to travelers, complete streets and active transportation have all seen rapid progress and implementation due to MTC efforts including the One Bay Area Grant program.

We urge MTC to bring this trend of success to the paratransit field and offer comprehensive, funded strategies to address the "lack of capacity" highlighted in the plan. This would allow the population assisted by this type of service to equitably benefit from MTC's substantial regional efforts.

Thank you for the opportunity to provide comments on this important Plan. If you have any questions on this letter please feel free to contact me or my staff, Planning Director John Kopchik john.kopchik@dcd.cccounty.us, (925) 674-7819.

Sincerely,

Karen Mitchoff, Chair
Contra Costa County Board of Supervisors
Supervisor, District IV

C: Amy Worth, MTC Commissioner
    Tom Butt, Chair – CCTA
    Peter Engel, Director of Programs – CCTA
    Drennen Shelton, Planner/Analyst – MTC
    Senior Mobility Action Council c/o J. Ray – Contra Costa Area Agency on Aging
    Regional Mobility Management Group c/o N. Armenta – Nelson/Nygaard Consulting