



Date: June 14, 2020  
Attention: Chair Jim Sperring, Blue Ribbon Transit Recovery Task Force  
Re: Item 4a. Transit Public Health & Safety Plan  
Item 4b. Near Term-Recovery Considerations  
Item 5a. CARES Phase 2 Funding Distribution Considerations

Dear Commissioner Sperring and Members of the Blue Ribbon Transit Recovery Task Force,

We applaud the unprecedented collaboration between Bay Area transit agencies and MTC during this crisis to align safety and recovery strategies. It has been very encouraging to see inter-agency coordination, which is evident in the June 15th Task Force materials.

We wish to constructively build off of this excellent collaboration with the following comments based on the materials circulated.

*Transit Public Health & Safety Plan*

- **Thank you for this excellent first step.** This multi-agency collaboration on a robust coordinated health & safety plan shows progress toward the goals of making transit objectively safe and “speaking with one voice” to help build rider confidence. Thank you for listening to riders and workers who have asked for such a coordinated approach.
- **An ongoing accountability framework for rider health and safety is needed.** The Transit Health & Safety Plan must not be viewed as a time-bound one-time project. Because health and safety will evolve constantly, with guidance, rules, and public sentiment changing every few months, part of the implementation plan needs to be a medium- and long-term plan for inter-agency decision-making, accountability, communications, and staffing. The presentation does not give any indication about how or whether multi-agency health and safety planning will continue in an ongoing manner across agency boundaries, and where accountability for the safety of the transit system as a whole will reside. As the plan develops, we hope to see a more durable accountability framework be developed so that once the consultant team has completed their work and the plan is “finished”, coordinated decision-making on health and safety does not cease. This multi-agency initiative should lead to ongoing new ways of making decisions across agency boundaries over the next several years.

*Near Term-Recovery Considerations*

- **We are pleased to see a commitment to network connectivity and some steps to achieve it.** Caltrain’s decision to align its new schedules with transfers at Millbrae to enable greater connectivity with BART is an excellent example of how we can prioritize connectivity.
- **We are pleased to see the sharing of innovative practices** such as peak-flattening communications campaigns, and real-time information about vehicle load to give passengers

information to avoid crowding. We urge agencies to share and publish the results of these strategies for the best customer service response and learning for the future.

- **Extra available capacity on parallel routes should be a consideration for service restoration decisions and equity evaluation.** In the explanation of recovery strategies, demand was the most often-cited criteria for restoring service; there was little acknowledgement of how the existence of parallel routes in the transit network with extra capacity, and in some cases greater opportunity for social distancing, could influence decisions on how to restore service. There are many examples where different agencies offer service along the same corridors -- VTA and SamTrans buses on El Camino Real parallel Caltrain service; BART parallels many of the busiest AC Transit and Muni routes; Golden Gate Transit parallels the entire SMART system. Uncoordinated fares, service, and information are obstacles to making use of this extra capacity on parallel routes to enable social distancing and get riders where they are going faster (thereby limiting their total time on transit and reducing their potential exposure to the virus). With limited resources, agencies should consider prioritizing bringing back service on lines for which there are no parallel alternative routes with extra capacity, versus adding extra service on routes for which alternatives exist. Agencies should also pursue strategies to shift riders from those busy routes to less busy parallel alternatives though fare policy changes and publicity campaigns. MBTA in Boston is providing a fare discount to riders to encourage them to use empty parallel commuter rail trains instead of the full light rail lines and subways in an effort to shift riders onto less crowded lines.
- **A coordinated multi-agency approach to determine how mask-wearing and other safety strategies intersect with poverty and mental health issues should be developed.** For transit to be safe, best practices from other regions suggest mask-wearing must be near universal, infected individuals must refrain from riding transit, and riders should refrain from approaching or speaking to each other. While the Bay Area's challenges with meeting the needs of populations that suffer from poverty, homelessness, and mental health issues have always impacted public transit, these challenges are now core to protecting rider and worker safety. We are pleased the small operators are proactively working with social service agencies, and even "Reassign[ing] drivers to alternative work including meal, food, pharmacy delivery, transporting unsheltered residents to hotel sites". We urge transit agencies to combine their collective resources and expertise to develop a comprehensive approach, and work in partnership with state, regional, and local social service agencies and non-profit organizations.

#### *CARES Phase 2 Funding Distribution Considerations*

- **We agree that the allocation of additional CARES act funding is urgent and must not be delayed.** At the same time, the service funded by this next allocation could be in place for a year or more, and will likely have long-term impacts on the level of connectivity and convenience of our transit network. We must prioritize an analysis of how to use this money as smartly and responsibly as possible to support a connected network, and not assume that formulas based on revenue loss only will provide riders with the best possible service.
- **Forward-looking equity policies should be associated with CARES act funding to expand access of low income riders to faster services.** MTC's proposed equity adjustments for CARES 2 funding reflect historic travel patterns based on pre-existing inequitable service and fare systems. Instead of adjusting CARES act funding only based on historic patterns, we recommend CARES act funding be leveraged to expand access of low income people to transit

and destinations across the Bay Area. This could be done by enabling low income people to access more expensive services - such as honoring local transit passes and fares on regional rail and express bus services - or by giving low income people discounts on transit costs, such as by eliminating transfer penalties.

- **Coordinated network service planning must be done to optimize the accessibility of the transit network and fulfil the funding distribution Principle #5.**
  - Principle #5 for the CARES act distribution supported “regional adjustments to ensure network connectivity, lifeline service needs, and financial sustainability.” We believe that this goal is consistent with the goal that transit expert Jarett Walker proposed at a recent SPUR forum on the Bay Area’s transit recovery, which is that we must ensure that “All kinds of people can go to all kinds of places to do all kinds of things”. We would like to see transit agencies work together to identify the regional core transit network, target levels of service for key transit corridors within that network to optimize riders’ access to destinations, and how the funding of such a network would impact CARES act allocations. The MTC proposal for distributing the remainder of CARES act funds appears to be based primarily off of projected revenue losses for each transit agency, which may not support the optimization of resources to provide the most transit access. By contrast, we again cite SFMTA’s leadership in identifying their core recovery network at a citywide level, to structure service to maximize access to destinations, particularly for transit-dependent populations, focusing on frequency and core routes. This type of network analysis must be completed at a regional Bay Area scale and be transit agency-agnostic. It cannot simply be an aggregation of individual agency’s plans developed separately. An agency-by-agency plan may leave out opportunities to maximize mobility on corridors served by multiple agencies and may leave transit-dependent users in some parts of the region with less than basic service. The cost of running the core transit network identified should be used as an additional datapoint in determining the CARES act funding distribution that best serves riders.
  - We strongly urge against postponing a study of network connectivity until after the CARES act funding allocation is complete. Even a very rough analysis of network connectivity and a core transit network, which can be completed in a matter of days, could be extremely useful over the coming weeks in informing service priorities to be funded by CARES.
  - **We therefore request that concepts for network connectivity be brought to the Blue Ribbon Task Force on June 29th, and that MTC provide additional CARES 2 funding allocation options that balance revenue loss with the goal of optimizing service and access to destinations.**

Thank you for your consideration,



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