

Comments by Lou Thompson on the Financial Efficiency Review, Draft Final Report, May 22, 2026, by Nelson\Nygaard Consultant Team

Overall, the report is well written and comprehensive. It will serve the purpose of meeting the requirement for a First Phase report as required under the terms of SB 63. I do have a few comments:

- Pg 14 mentions the Consumer Price Index of 285 in 2020 and 325 in 2025, but it does not give the base year. This should be corrected in the Final Report, either in the text or in a footnote.
- Pg. 46, under Early Action Strategies, mentions five metrics, but then does not provide the metrics or the data needed to compute the metrics. Also, in my written comments on the draft report for the April meeting, I asked that the final report include five years of data on passengers (unlinked passenger trips), passenger-miles, seat-miles, route-miles served, breakdowns of operating costs by category and weekday versus weekend service. I do not believe the financial efficiency of the agencies can be fully evaluated without these indices, and they are readily available from the National Transit Database. This may not be fully correctable in the Phase One Final Report, but the metrics will play a significant role in the Phase Two analyses.
- On Pg. 48, I am concerned about the context in which the zero-emission bus (ZEB) discussion is couched. The report should acknowledge at the outset that the ZEB initiative is an important environmental action by the state that the agencies support and would like to implement fully. The report should then emphasize that the ZEB mandate imposes large costs on the agencies that the agencies cannot recover from revenues or existing levels of support. The need to renegotiate the ZEB mandate is not reluctance by the agencies, it is instead an unfortunate outcome of the lack of funding from the state to back up the mandate.