



Ayars
& Associates
Strategic Public Affairs Consulting

VCTC: Assessment of Annual Transportation Development Act (TDA)

Unmet Transit Needs

Definitions & Public Involvement

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Appendix 1: Definitions from other counties

Study Background

Recognizing that Ventura County's Unmet Transit Needs process is outdated and could serve the public better, the Ventura County Transportation Commission (VCTC) asked COH & Associates, Inc. and Ayars & Associates to review the existing VCTC Unmet Transit Needs definitions and process with the goal of creating recommendations for improvements.

During the month of October 2013, COH & Ayars researched and contacted 30 regional transportation planning agencies throughout California and 49 community organizations, elected officials, individual commuters, and social service agencies in Ventura County.

COH & Associates, Inc. gathered input on best management practices from other regional transportation planning agencies. This information was used to create recommendations for VCTC to update the definitions of an Unmet Transit Need and Reasonable to Meet with the objective of improving ease of understanding with the public, VCTC commissioners, and elected officials.

Ayars & Associates conducted focused interviews with a variety of interested parties in Ventura County ranging from community non-profits, senior organizations, business and tourism interests, colleges, healthcare agencies, elected officials, and individual commuters. Constructive criticism and general knowledge of the process was gathered as background information to develop an expanded public input process and design a community outreach method specific to VCTC's unique opportunities.

TDA Background

The Transportation Development Act (TDA) was enacted in 1971 by the California Legislature to improve existing public transportation services and encourage regional transportation coordination. TDA provides funding through the Ventura County Transportation Commission (VCTC) to be allocated to transit and non-transit related purposes. Rules and regulations that govern the TDA process are included in the California Public Utilities Code and the California Government Code.

Since the priority for TDA funds is transit, the “unmet transit needs” (UTN) process was developed to ensure that unmet transit needs that are reasonable to meet are funded before TDA funds are expended for local street and road needs. After July 1, 2014, only the cities of Camarillo, Fillmore, Moorpark and Santa Paula will be eligible to use TDA funds for streets and roads pursuant to State law.¹

General Unmet Transit Needs Process Requirements

The UTN process is required in counties when local streets and road projects are eligible for TDA funds such as in Ventura County. General UTN requirements are:

- Establish a Social Services Transportation Advisory Council (SSTAC);
- Establish “unmet transit needs” and “reasonable to meet” definitions;
- Establish and implement a process of citizen participation that utilizes the SSTAC to hear the transit needs of transit dependent or disadvantaged persons;
- Provide at least one public hearing annually;
- Provide documentation to Caltrans annually:
 - Notice published 30 days before hearing date;
 - Copy of hearing notice & proof of publications;
 - Resolution or minutes documenting “unmet transit needs” and “reasonable to meet” definitions;
 - Signed resolution adopting Unmet Transit Needs findings;
- Hold countywide hearing, and do not limit input solely in areas where TDA funds local street and road needs.

TDA programs and the Unmet Transit Needs process are managed by state designated Regional Transportation Planning Agencies. VCTC is the designated agency for Ventura County.

¹ After July 1, 2014, Public Utility Code (PUC) sections 99232.1 and 99232.2 allow cities with a population of 100,000 or less to use TDA funds for streets and roads. Cities of Port Hueneme, Ojai, and the County unincorporated, while having populations under 100,000, are part of the Gold Coast Transit District, and along with the Cities of Ventura and Oxnard, must use all TDA funds allocated for transit. The cities of Simi Valley and Thousand Oaks, with populations over 100,000, are no longer eligible to use TDA funds for local streets and roads beginning July 2014. **VCTC can only require agencies that are eligible to use TDA funds for local streets and roads to implement or fund services identified during the unmet needs process.**

Current VCTC Unmet Transit Needs Process

November: CTAC/SSTAC adopts schedule & definitions for next year

December: VCTC adopts schedule & definitions for next year

January: Public hearing notices published in local newspapers 30 days prior to hearing

February: Public hearing held during first week in Camarillo, plus 2 evening meetings

April: CTAC/SSTAC approves Unmet Transit Needs Recommendations/Findings

May: VCTC approves Unmet Transit Needs Recommendations/Findings

August: Unmet Transit Needs Findings are due to state by August 15

Study Methodology

The evaluation to update the VCTC UTN process was comprised of two components:

1. Review of UTN definitions and processes from other counties in California to identify Best Management Practices that could be applied to improve the existing VCTC process.
2. Input from stakeholders including community organizations, commuters, social service agencies, policy board members, transit operators, and VCTC committees and staff to improve public involvement.

UTN programs from over 30 counties in California were reviewed for best management practices. A summary of UTN definitions and best management practices from other California counties is included as an attachment to this report.

Best Management Practices from other Agencies

Best management practices identified from other programs in the state include:

- Clear definitions not subject to interpretation.
- Define what is and is not an UTN.
- Well-defined performance measures and criteria.
- Findings that include assessment of transit services pursuant to PUC 99401.5.
- Integrating the UTN process with the short-range transit planning process and continuous analysis.

Because management practices for UTN outreach activities were not clearly evident, this report includes outreach recommendations specifically tailored for Ventura County.

The UTN definition recommendations included in this report are largely based on the best management practices identified through this study.

Unmet Transit Need

Definition Options & Recommendations

The current Ventura County definition of an “unmet transit need” (UTN) is listed below.

**Ventura County
Current Unmet Transit Need Definition**

Unmet Transit Needs are, at a minimum, those public transportation services that have been identified by substantial community input through the public hearing process or are identified in a Short Range Transit Plan; in local Americans with Disabilities Act (ADA) plans; in other area/local paratransit plans; and/or in the Regional Transportation Plan and have not yet been implemented or funded.

The definition includes two key components common in other UTN definitions throughout California:

1. The proposed service has not been funded or implemented; and
2. The proposed service is identified through public input or identified in planning documents.

Item 2 listed above is usually found when definitions include a minimum threshold for public input to meet the definition of UTN. Also, unlike other county definitions, the Ventura County definition limits the identification of transit needs to the public hearing process.

Four alternatives to the existing VCTC UTN definition have been developed. The first option, Option 1, is the most simplistic but has the potential of increasing the number of requests required to be analyzed by staff under the “reasonable to meet” criteria. Option 1 defines any request for service that has not been funded or implemented to meet the definition of an unmet transit need. This option is consistent with counties that will consider all requests in their annual analysis.

**Unmet Transit Need Definition
Option 1**

Public transportation services identified by a group or individual that have not been funded or implemented.

An Expanded Option 1 adds examples of what is and is not an UTN:

**Proposed Unmet Transit Need Definition
Option 1: Expanded**

Public transportation services identified by a group or individual that have not been funded or implemented.

Unmet transit needs specifically include:

- Public transit services not currently provided to reach employment, medical assistance, shop for food or clothing, to obtain social services such as health care, county welfare programs and educational programs. Service must be needed by and benefit the general public.
- Service expansions including new routes, significant modifications to existing routes, and major increases in service hours and frequency.

Unmet transit needs specifically exclude:

- Operational changes such as minor route changes, bus stop changes, or changes in schedule.
- Requests for extended hours or days of service.
- Service for groups or individuals that is not needed by or will not benefit the general public.
- Comments about vehicles, facilities, driver performance and transit organizational structure.
- Requests for better coordination.
- Requests for reduced fares and changes to fare restrictions.
- Improvements funded or scheduled for implementation in the following year.
- Future transportation needs.
- Duplication or replacement of existing service.

The expanded definition for Option 1 may also be applied to Options 2 through 4 as described below.

Option 2 below would generally require more than one request for service from the public to meet the definition of an “unmet transit need.” The hearing board would decide the acceptable threshold level based on recommendations from staff. Transit needs identified in any government-approved document are automatically considered unmet transit needs under Option 2. This is similar to the existing VCTC process and common throughout the state.

**Proposed Unmet Transit Need Definition
Option 2**

Public transportation services that have not been funded or implemented identified by the public or identified as an unmet transit need in a government approved plan.

Option 3 is similar to Option 2 except that a minimum threshold is required to meet the definition of an UTN and requires that persons who will likely use the service on a routine basis demonstrate support. The Option 3 threshold is included in the definition adopted by the San Luis Obispo Council of Governments (SLOCOG).

**Proposed Unmet Transit Need Definition
Option 3**

Public transportation services identified by the public with sufficient broad-based community support that have not been funded or implemented. Unmet transit needs identified in a government-approved plan meet the definition of an unmet transit need. Sufficient broad-based community support means that persons who will likely use the service on a routine basis demonstrate support: at least 15 requests for general public service and 10 requests for disabled service.

Option 4 is based on the annual process adopted by the Sacramento Area Council of Government (SACOG) that requires the integration of the annual unmet transit needs process with the short-range transit planning process. Under this process, unmet transit needs brought up during the public hearings and in SSTAC meetings can be studied and evaluated by staff and others as part of overall transit planning.

**Proposed Unmet Transit Need Definition
Option 4**

Those needs identified as unmet transit needs that have been considered as part of the annual transportation planning process, including regional and short-range transit plans, which have not been implemented or funded.

Under Option 4, a service request from the public is considered to meet the definition of an unmet transit need only if staff has already analyzed the requested service. Requests for service that would otherwise meet the definition of an UTN are examined during the year to determine if the request is reasonable to meet. The request would then be identified as an unmet need and incorporated into local transit plans. Also included in the report is whether the request is reasonable to meet. If the request is considered not reasonable to meet, it will be reevaluated in future years until it is determined that it is no longer an unmet transit need.

Unmet Transit Need

Definition Recommendation

Expanded Option 3

Expanded option 3 is recommended because it provides clear definitions and examples of an UTN. Option 3 also defines the type and number of requests required for a proposed service to meet the definition of an UTN. This should result in a significant reduction in the number requests to be analyzed, and will allow VCTC to focus on evaluating higher priority requests from the public.

Reasonable to Meet Definition Options & Recommendations

The current Ventura County definitions of “reasonable to meet” (RTM) are listed below. The definitions are categorized by desired “outcomes,” which are typical of other RTMs in the State.

Current VCTC Definitions

An Unmet Transit Need shall be considered reasonable to meet if the proposed service² is in general compliance with the following criteria:

Equity

1. The proposed service will not cause reductions in existing transit services that have an equal or higher priority.
2. The proposed service will require a subsidy generally equivalent to other similar services.

Timing

1. The proposed service is in response to an existing rather than future transit need.

Feasibility

1. The proposed service can be provided within available funding.
2. The proposed service can be provided with the existing fleet or under contract to a private provider.

Performance

1. The proposed service will not unduly affect the operator’s ability to maintain the required passenger fare ratio for its system as a whole.
2. The proposed service will meet the scheduled passenger fare ratio standards as described in Attachment A (see page 11).
3. The estimated number of passengers to be carried will be in the range of other similar services, and/or the proposed service provides a “link” or connection that contributes to the effectiveness of the overall transit system.

Community Acceptance

1. The proposed service has community acceptance and/or support as determined by the Unmet Transit Needs public hearing record, inclusion in adopted programs and plans, adopted governing board positions and other information.

² Proposed Service is defined as the specific transit service identified as an Unmet Transit Need (as defined) and which requires evaluation against this definition of “reasonable to meet.”

Current VCTC Performance Criteria ATTACHMENT A		
<p>It is desirable for all proposed transit services in urban areas to achieve a 20% passenger fare ratio by the end of the third year of operation. A passenger fare ratio of 10% is desired for special services (i.e., elderly and disabled) and rural area services.^a More detailed passenger fare ratio standards, which will be used to evaluate services as they are proposed and implemented, are described below. Transit serving both urban and rural areas, per state law, may obtain an “intermediate” passenger fare ratio.</p>		
Urban Service	Rural Service	Recommended Action
New Service Performance Criteria: End of Twelve Months		
Less than 6%	Less than 3%	Provider may discontinue service
6% or more	3% or more	Provider will continue service, with modifications if needed
New Service Performance Criteria: End of Twenty-Four Months		
Less than 10%	Less than 5%	Provider may discontinue service
10% or more	5% or more	Provider will continue service, with modifications if needed
New Service Performance Criteria: End of Thirty-Six Months^b		
Less than 15%	Less than 7%	Provider may discontinue service
15% to 20%	7% to 10%	Provider may consider modifying and continue service
20% or more	10% or more	Provider will continue service, with modifications if needed
^a Per statute the VCTC may establish a lower fare for community transit (dial-a-ride) services.		
^b A review will take place after 30 months to develop a preliminary determination regarding the discontinuation of proposed services.		

Reasonable to Meet Options

Existing VCTC “reasonable to meet” definitions were examined to determine whether they should be kept, deleted or replaced with other definitions. Measures and criteria were added to clarify the definitions. The “reasonable to meet” recommendations resulting from the evaluation are summarized in the table below.

✓ = Recommended; ⊘ = Not Recommended				
Outcome	Option	Definitions	Measures & Criteria	Recommendation
Equity	1 ✓	The proposed service will not cause reductions in existing transit services that have an equal or higher priority. (Note: existing VCTC definition)	Measures: Vehicle revenue service hours and revenue service miles. Criteria: Transit vehicle service hours and miles will not be reduced on existing routes to fund the proposed service. (Note: Newly proposed)	Keep existing definition. Add the measures and criteria to clarify the definition.
Equity	2 ⊘	The proposed service will require a subsidy generally equivalent to other similar services. (Note: existing VCTC definition)	Measures: Subsidy per mile or subsidy per hour. Criteria: Subsidy per mile or hour for proposed service is not higher than the subsidy per mile or hour for the comparison service. (Note: Newly proposed)	Delete the definition because it contradicts the farebox recovery criteria listed in Option 9, Attachment A, that allows greater subsidy for new service in the first two years. This definition and Option 9 are both measure cost-effectiveness.
Timing	4 ✓	The proposed service is in response to an existing rather than future transit need. (Note: existing VCTC definition)	Criteria: Same as definition that proposed service is in response to an existing rather than future transit need; based on public input.	Keep the definition. Add criteria.

✔ = Recommended; ⊘ = Not Recommended				
Outcome	Option	Definitions	Measures & Criteria	Recommendation
Feasibility	5 ⊘	The proposed service can be provided within available funding (per state law, the lack of available resources shall not be the sole reason for finding that a transit need is not reasonable to meet). (Note: existing VCTC definition)	Criteria: Services which, if implemented or funded, would not cause the responsible operator to incur expenditures in excess of the maximum amount of: 1) Location Transportation Funds and State Transit Assistance Funds that may be available for such operator to claim; 2) Federal Transportation Administration (FTA) Funds or other support for public transportation services committed by federal and/or state agencies by formula or tentative approval of specific grant requests; 3) Farebox and local funding in compliance with PUC Section 99268 et, seq. (Note: Newly proposed)	Delete the definition because State law prohibits the lack of available resources to be the sole reason for finding that a transit need is not reasonable to meet. Also, this definition is not “pass/fail” like the other recommendations.
Feasibility	6 ✔	The proposed service can be provided with the existing fleet or under contract to a private provider. (Note: existing VCTC definition)	Measure: Vehicle spare ratio. Criteria: Transit system must be able to maintain FTA’s spare ratio requirement of 20% (buses in peak service divided by the total bus fleet cannot fall below 20%). If less than 20%, can additional buses be obtained (purchased or leased) or can service be provided under contract to a private provider? (Note: Newly proposed)	Keep the definition. Add the measures and criteria to clarify the definition.

✓ = Recommended; ⊗ = Not Recommended				
Outcome	Option	Definitions	Measures & Criteria	Recommendation
Feasibility	7 ✓	There are adequate roadways to safely accommodate transit vehicles. (Note: Newly proposed)	Measure & Criteria: Route inspection to determine adequacy of infrastructure to accommodate transit vehicles and passengers. (Note: Newly proposed)	Add the new definition, measure and criteria because they consider the physical environment.
Performance Cost Effectiveness	8 ✓	The proposed service will not unduly affect the operator’s ability to maintain the required passenger fare ratio for its system as a whole. (Note: existing VCTC definition)	Measure: Total estimated annual passenger fare revenue divided by total annual operating cost (the entire service including the proposed service) Criteria: fare revenue/operating cost cannot fall below the operator’s required passenger fare ratio. (Note: Newly proposed)	Keep the definition. Add the measures and criteria to clarify the definition.
Performance Cost Effectiveness	9 ✓	The proposed service will meet the scheduled passenger fare ratio standards described in Attachment A. (Note: existing VCTC definition)	Existing Attachment A.	Keep the definition, and the measures and criteria in Attachment A as modified.
Performance	10 ⊗	The estimated number of passengers to be carried will be in the range of other similar services, and/or the proposed service provides a “link” or connection that contributes to the effectiveness of the overall transit system. (Note: existing VCTC definition)		Delete the definition because it is vague.

✓ = Recommended; ⊘ = Not Recommended				
Outcome	Option	Definitions	Measures & Criteria	Recommendation
Service Effectiveness	11 ✓	Estimated passengers per hour for the proposed service will not be less than the system-wide average after three years. (Note: Newly proposed)	Measure: Passengers per hour. Criteria: Projected passengers per hour for the proposed service is not less than 70% of the system-wide average (without the proposed service) at the end of 12 months of service, 85% at the end of 24 months of service, and 100% at the end of 36 months of service.	Add the new definition, measure and criteria in place of the deleted performance outcome (Option #10 above).
Community Acceptance	12 ⊘	The proposed service has community acceptance and/or support as determined by the Unmet Transit Needs public hearing record, inclusion in adopted programs and plans, adopted governing board positions and other information. (Note: existing VCTC definition)	Criteria: Same as definition.	Delete the definition because a support threshold is included in the recommended revised Unmet Transit Need definition.

VCTC reserves the right to waive results of the analysis in an effort to fund new service.

Report of Findings

Recommendations

The annual report of unmet transit needs Findings would be significantly improved with the implementation of the following three recommendations:

- Make a clear connection between each finding and performance measure criteria. Explain how or why proposed services fail or pass the criteria for each definition. Show evaluation results including calculations for quantitative measures.
- Include a summary of data and assumptions used to evaluate proposed services such as system-wide transit service data from the National Transit Database and ridership estimates.
- Include a summary of the analysis pursuant to PUC 99401.5 that requires an annual assessment of the size and location of identifiable groups likely to be transit dependent or transit disadvantaged, among other items. The report should include a discussion on how the recommended Findings would impact service to the transit dependent or transit disadvantaged identified in the evaluation.

Unmet Transit Need

Public Involvement

Over the last few years, the Ventura County Transportation Commission (VCTC) has recognized that the Unmet Transit Needs process is outdated for Ventura County. A large part of the problem rests with unmet needs definitions that are vague and unclear to the public. Another part of the problem lies in a root frustration with the public involvement process and a lack of understanding regarding how to affect positive change within the system.

VCTC staff has tried a few of different tactics in the past, including adding evening public meetings and sending out materials to encourage increased participation. To better understand the problems with the current system and create recommendations to improve public involvement in the Unmet Transit Needs process, Ayars and Associates conducted outreach to a wide variety of transportation-interested parties that included community organizations, individuals, elected officials, public health agencies, unions, farm worker residential organizations, after school programs, and student groups.

Outreach Summary

Outreach and focused interviews were conducted with 49 Ventura County elected officials and community organizations focused on transit, seniors, after school care, tourism, colleges, and healthcare between October 7 and 23, 2013.

During the outreach process, it became clear that VCTC staff have tried to include a wide variety of community members ranging from senior citizens to community groups serving minority and transit-dependent populations. While community members commented that individual staff members were helpful, there is an acknowledged disconnect between the current definitions of an unmet need and what the public feels should be addressed as part of the Unmet Transit Needs process or as a portion of another transportation planning process. A number of key issues surfaced that resonated with a wide variety of people, including:

Key Issues

- Frustration that the current process identifies issues, but that all issues are deemed "unreasonable to meet"
- Evening meetings are at a better time than daytime hearings, but the process feels outdated and difficult for transit-dependent individuals
- Most people are unaware of what actually qualifies as an Unmet Transit Need
- Materials and information are not getting to the bus riders
- There is not an easy way to know how comments are affecting transportation planning or if they do any good at all
- Current program pits agency vs. rider
- If more money is needed (which most people felt it was), then VCTC needs to show which projects would be a priority and a potential timeline for implementation – it should be noted that many people who would like to help improve transit would also be likely to help Ventura become a self-help county
- The majority of people on the existing VCTC outreach list are not knowledgeable about the Unmet Needs Process and are unaware that they receive materials

Public Involvement

Recommendations

Based on the feedback from observers, frustrated riders, people who feel underserved by the current process, and individuals who have tried to help VCTC gain input for the Unmet Transit Needs process, Ayars and Associates devised the following recommendations for improving the public outreach component. Recommendations are grouped into two key areas – improvements for the current public hearing process and a customized public partnership that specifically addresses unique VCTC options.

Ways to Improve Public Involvement

- Solicit feedback from bus riders and other transit users throughout the year; VCTC staff should sort comments into Unmet Transit Needs, Operational Issues, Long Range Planning, etc. and not rely on the public to direct comments solely to the Unmet Transit Needs process
- Create text, voicemail, email, and regular mail collection points for comments that can be checked throughout the year with clear time-tables to show when comments will be considered
- Update outreach flyers to graphically grab people's attention
- Add an example of a positive outcome from the Unmet Transit Needs process – perhaps the addition of VISTA service – to the Unmet Transit Needs flyer and outreach materials
- Use existing transit space (i.e. bus ads, posters in transit centers, etc.) to solicit feedback and expand awareness
- Update the outreach list to include current contact people and active community organizations, with additions to the list to include:
 - MICOP – Mixteco/Indigena Community Organizing project
 - The Client Network
 - Amigos 805
 - LA “M” 103.7 FM
 - Radio Lazar

Ways to Improve Public Involvement continued...

- Consider bus surveys to help prioritize key improvements and share information with transit users
- Consider comment boxes at transit centers, colleges, universities, and key healthcare service agencies to solicit input throughout the year
- Empower the Citizen's Transportation Advisory Committee by sharing ongoing information about VCTC's activities and key milestones
- Consider holding public input meetings that are sponsored by social service agencies and community organizations in place of the two VCTC night meetings to encourage greater public participation; video tape meetings and make them available on the VCTC website
- Extend an invitation to transit operators to attend public input meetings and hearings; send operational service issues to transit providers and request follow-ups be sent to commenters and VCTC
- Update the format of the Unmet Transit Needs report for readability and easy to find information; color code information to fall into categories such as Unmet Transit Need, Findings and Analysis: Short Range Planning or Long Range Planning, Existing Service Issue, etc.

Customized Public Partnership for VCTC

A consistent theme that arose during the public outreach process is that many people in Ventura County would like to help improve transit. This presents a unique opportunity for VCTC, because these individuals have offered to help create positive change rather than merely complain about lack of service. Ayars and Associates recommends that VCTC improve their Unmet Transit Needs process by partnering with community organizations, agency representatives, individuals, and elected officials to gather input for Unmet Transit Needs and larger transportation projects. Since some efforts to work with these groups have failed in the past, it is important that this partnership address two key areas in order to be effective:

1. Recognize that people have been frustrated in the past by lack of understanding on what qualifies as an Unmet Transit Need

2. Show how improvements can be made through the Unmet Transit Needs process and through other VCTC transportation planning efforts

Steps to create a public partnership

- Hold 3 *training workshops* based on VCTC subregions (East County, Heritage Valley, and Gold Coast Transit) and invite key stakeholders, such as groups listed on pages 22 and 23
- Prepare materials for training that include examples of what is helpful to see on an unmet need suggestion and what isn't
- Prepare a one-sheet re: transportation planning and where comments go if they are not deemed unmet needs
- Work with local media and elected officials to "kick-off" yearly process with events around the county to highlight ways to submit comments and participate at the public hearing
- Hold community meetings sponsored by community organizations or agencies, so that participation is encouraged by people already working with transit-dependent, senior, and special needs populations
- Gather input and demonstrate how comments are helpful to the planning or operations process even if not determined to be unmet needs
- Work with local organizations and elected officials to identify and plan for short and long range transit improvements
- Send a follow-up report to everyone invited and involved in the process that demonstrates next steps and thanks them for participating; the report should also be posted on VCTC's website, featured in the VCTC newsletter, and highlighted via existing VCTC social media channels

Background Information

Stakeholders Contacted (* denotes focused interview)

Community Organizations & Non-profits

- ACTION Foundation*
- ARC*
- ASERT – Alliance for Sustainable and Equitable Transportation, a division of COAST *
- Boys & Girls Clubs of Greater Oxnard and Port Hueneme
- Boys & Girls Club of Greater Ventura
- Cabrillo Economic Development Corporation (CEDC)
- CAUSE – Central Coast Alliance United for a Sustainable Economy
- Catholic Charities of Ventura County
- Community Action Partnership
- Harriett H. Samuelsson The Club Teen Center
- Kids & Families Together
- League of Latin American Citizens
- Los Padres Democrat Club*
- Martin V. Smith Youth Center*
- Mixteco*
- Ojai Valley Democrats
- One Step A La Vez
- Project Understanding
- Salvation Army – Ventura Corps
- SEIU 721*
- VCCool – Ventura Climate Care Options Organized Locally*
- Ventura County Bicycle Coalition
- Ventura County Republican Party*

Senior Organizations

- Conejo Valley Senior Concerns*
- Grey Law
- The Lexington
- Moran Manor Senior Day Care Center
- Ventura County Area Agency on Aging
- Ventura Senior Coordinating Council
- Ventura TowneHouse*

Colleges

- California State University Channel Islands, Student Government
- Oxnard College
- Ventura College

Business & Tourism

- Oxnard Chamber of Commerce
- Ventura Chamber of Commerce*
- Ventura Visitors Bureau*

Healthcare Services

- Ventura Convalescent Hospital
- Ventura County Behavioral Health*
- Ventura County Health Care Agency

Elected Officials (staff interviews) & Committees

- Citizens Transportation Advisory Committee*
- State Assemblyman Das Williams*
- State Assemblyman Jeff Gorell
- State Assemblyman Scott Wilk
- State Senator Fran Pavley*
- State Senator Hannah Beth Jackson*

BACKGROUND INFORMATION

Stakeholders Contacted (* denotes focused interview)

Individual Commuters

- Carlos Lopez - Moorpark
- Cheryl Roberson
- Michael Collie - Camarillo*

Conclusion

Unmet Transit Need

Recommended Definition

Based on a review of the best management practices in California, we recommend using Option 3: Expanded as the new Unmet Transit Need definition.

Recommended Unmet Transit Need Definition Option 3: Expanded

Public transportation services identified by the public with sufficient broad-based community support that have not been funded or implemented. Unmet transit needs identified in a government-approved plan meet the definition of an unmet transit need. Sufficient broad-based community support means that persons who will likely use the service on a routine basis demonstrate support: at least 15 requests for general public service and 10 requests for disabled service.

Unmet transit needs specifically include:

- Public transit services not currently provided to reach employment, medical assistance, shop for food or clothing, to obtain social services such as health care, county welfare programs and educational programs. Service must be needed by and benefit the general public.
- Service expansions including new routes, significant modifications to existing routes, and major increases in service hours and frequency.

Unmet transit needs specifically exclude:

- Operational changes such as minor route changes, bus stop changes, or changes in schedule.
- Requests for extended hours or days of service.
- Service for groups or individuals that is not needed by or will not benefit the general public.
- Comments about vehicles, facilities, driver performance and transit organizational structure.
- Requests for better coordination.
- Requests for reduced fares and changes to fare restrictions.
- Improvements funded or scheduled for implementation in the following year.
- Future transportation needs.
- Duplication or replacement of existing service.

Reasonable to Meet

Recommended Definition

Outcome	Definitions	Measures & Criteria
Equity	The proposed service will not cause reductions in existing transit services that have an equal or higher priority. (Note: existing VCTC definition)	Measures: Vehicle revenue service hours and revenue service miles. Criteria: Transit vehicle service hours and miles will not be reduced on existing routes to fund the proposed service. (Note: Newly proposed)
Timing	The proposed service is in response to an existing rather than future transit need. (Note: existing VCTC definition)	Criteria: Same as definition that proposed service is in response to an existing rather than future transit need; based on public input.
Feasibility	The proposed service can be provided with the existing fleet or under contract to a private provider. (Note: existing VCTC definition)	Measure: Vehicle spare ratio. Criteria: Transit system must be able to maintain FTA's spare ratio requirement of 20% (buses in peak service divided by the total bus fleet cannot fall below 20%). If less than 20%, can additional buses be obtained (purchased or leased) or can service be provided under contract to a private provider? (Note: Newly proposed)
Feasibility	There are adequate roadways to safely accommodate transit vehicles. (Note: Newly proposed)	Measure & Criteria: Route inspection to determine adequacy of infrastructure to accommodate transit vehicles and passengers. (Note: Newly proposed)
Cost Effectiveness	The proposed service will not unduly affect the operator's ability to maintain the required passenger fare ratio for its system as a whole. (Note: existing VCTC definition)	Measure: Total estimated annual passenger fare revenue divided by total annual operating cost (the entire service including the proposed service) Criteria: fare revenue/operating cost cannot fall below the operator's required passenger fare ratio. (Note: Newly proposed)
Cost Effectiveness	The proposed service will meet the scheduled passenger fare ratio standards described in Attachment A. (Note: existing VCTC definition)	Measures and criteria in Attachment A.

Outcome	Definitions	Measures & Criteria
Service Effectiveness	Estimated passengers per hour for the proposed service will not be less than the system-wide average after three years. (Note: Newly proposed)	Measure: Passengers per hour. Criteria: Projected passengers per hour for the proposed service is not less than 70% of the system-wide average (without the proposed service) at the end of 12 months of service, 85% at the end of 24 months of service, and 100% at the end of 36 months of service.

VCTC reserves the right to waive results of the analysis in an effort to fund new service.

Updated ATTACHMENT A

It is desirable for all proposed transit services in urban areas to achieve a 20% passenger fare ratio by the end of the third year of operation. A passenger fare ratio of 10% is desired for special services (i.e., elderly and disabled) and rural area services.^a More detailed passenger fare ratio standards, which will be used to evaluate services as they are proposed and implemented, are described below. Transit serving both urban and rural areas, per state law, may obtain an “intermediate” passenger fare ratio.

Urban Service	Rural Service	Recommended Action
New Service Performance Criteria: End of Twelve Months		
Less than 6%	Less than 3%	Provider may discontinue service
6% or more	3% or more	Provider will continue service, with modifications if needed
New Service Performance Criteria: End of Twenty-Four Months		
Less than 10%	Less than 5%	Provider may discontinue service
10% or more	5% or more	Provider will continue service, with modifications if needed
New Service Performance Criteria: End of Thirty-Six Months^b		
Less than 15%	Less than 7%	Provider may discontinue service
15% to 19%	7% to 9%	Provider may consider modifying and continue service
20% or more	10% or more	Provider will continue service, with modifications if needed
^a Per statute the VCTC may establish a lower fare for community transit (dial-a-ride) services.		
^b A review will take place after 30 months to develop a preliminary determination regarding the discontinuation of proposed services.		

Public Involvement

Recommended Enhancements

VCTC can improve public involvement both in terms of hearing from more people and reducing the amount of frustration with the process by:

- Soliciting year-round feedback (through comments and surveys) and sorting responses into Unmet Transit Needs, Operational Issues, Long-range planning, etc.
- Updating outreach materials to graphically grab people's attention and demonstrate the effectiveness of the process; then positioning materials where transit users will see them
- Updating outreach lists with current contacts and providing information to interested parties, such as CTAC members, throughout the year
- Utilizing existing channels of communication with key interest groups and inviting transit partners to participate in the public process (meetings & public hearing)
- Updating the Unmet Transit Needs report for readability and to demonstrate effectiveness of public input

Please refer to pages 19 and 20 for a complete list of enhancement recommendations.

Customized Public Partnership

Building on the improvements to public involvement, VCTC has a unique opportunity to partner with community organizations, elected officials, social service agencies, and transit users to help gather input for both the Unmet Transit Needs process and long-range transportation planning efforts. Key steps to create a successful partnership are listed on page 21 and include:

- Holding training workshops to enable interested parties to effectively help VCTC gather input
- Working with local elected officials and media to get the word out before the public hearing
- Holding community meetings sponsored by community organizations that already work with special needs groups to encourage more people to participate in the process
- Following up with everyone involved to show the effectiveness of the process with the updated Unmet Transit Needs report

By updating the definitions of Unmet Transit Need and Reasonable to Meet while improving public involvement in the overall process, VCTC will address key public concerns related to both a lack of understanding regarding what qualifies as an Unmet Transit Need and how public input can positively affect transportation planning in Ventura County.

APPENDIX 1

Unmet Transit Needs Definitions from Select Counties

Alpine		
Definitions	Unmet Transit Need	“Unmet Transit Needs” are defined as those transit needs which are not being met.
	Reasonable to Meet	“Reasonable To Meet” is defined as those unmet transit needs that the ACLTC finds are within its ability to satisfy, in whole or in part, based on consideration of such factors such as equity, timing, feasibility, public safety, community acceptance, economy (short-term and long-term), cost effectiveness, operational efficiency, available funding and other factors related to providing transit services deemed appropriate by the ACLTC.

Amador		
Definitions	Unmet Transit Need	<p>The Commission has defined "unmet transit needs" as any deficiency in the system of public transit services, specialized transportation services, paratransit services or private transportation services within Amador County which has been identified by community members or through the regional planning process and which has not been funded and implemented. Unmet needs may also include desires for transportation services which are identified through the annual unmet needs process including but not limited to the following:</p> <ol style="list-style-type: none"> 1. Amador County Transit Development Plan adopted by ACTC June 16, 2008 as amended November 30, 2009, March 17, 2010, June 15, 2011, February 22, 2012 and March 20, 2013; 2. Amador County Coordinated Public Transit Human Services Transportation Plan Final Report, adopted by ACTC on August 20, 2008; 3. The 2012 Amador County Long-Range Transit Development Plan adopted by ACTC on February 20, 2013; 4. ACTC recommendations for AA+8 AT performance improvements; 5. Social Service Transportation Advisory Council (SSTAC) recommendations; 6. Other public comments or requests submitted during the ACTC's annual transit needs hearing held on March 20, 2013.
	Reasonable to Meet	<p>The Commission has defined an unmet transit need as "reasonable-to-meet" if the following conditions prevail:</p> <ul style="list-style-type: none"> • Amador Transit's overall service (including administration and overhead) must achieve 10% farebox return. • ACTC may allow routes to exist that provide between 6% and 10% farebox recovery ratio provided the overall system maintains a 10% farebox recovery ratio as mandated by the TDA. • Transit services are "capped" by the amount of available TDA (LTF and STA) funds and other grants that are available in any given year.

Butte		
Definitions	Unmet Transit Need	Unmet Transit Needs are those trips required, but currently not provided, and not scheduled to be provided within Butte County for individuals dependent on public transit to maintain a minimum standard of living.
	Reasonable to Meet	Reasonable to meet shall include all of the following factors: 1. Cost Effectiveness: The cost to provide the service will meet the minimum farebox recovery ratio. 2. Economy: The project can be implemented at reasonable cost. 3. Community Acceptance: Support exists, indicated through the public hearing process. 4. Operational Feasibility: The service must be safe to operate.

Calaveras		
Definitions	Unmet Transit Need	Public transit or specialized transportation services not currently provided for persons within Calaveras County who have no reliable, affordable, or accessible transportation for necessary trips. Necessary trips are defined as those trips which are required for the maintenance of life, education, access to social service programs, health, physical and mental well-being, including trips which serve employment purposes. The size and location of the group must be such that a service to meet their needs is feasible within the definition of "reasonable to meet" as set forth below. Unmet needs may include needs for transportation services which are identified through the annual unmet transit needs process, or by the Social Services Transportation Advisory Council (SSTAC) which are not yet implemented or funded. The consideration of unmet transit needs is not limited to the abovementioned methods. It is the practice of the Calaveras Council of Governments to consider input relative to transit needs from any group or member of the public wishing to express such needs. The definition excludes: 1. Minor operational improvements or changes, involving issues such as bus stops, schedules, and minor route changes which are being addressed by routine or normal planning process, 2. Improvements funded or scheduled for implementation in the fiscal year following the Unmet Transit Needs Hearing, and 3. Future transportation needs.
	Reasonable to Meet	A. Financial Feasibility. 1) The proposed transit service, if implemented or funded, would not cause the responsible operator or service claimant to incur expenses in excess of the maximum allocation of Transportation Development Act (TDA) funds, State Transit Assistance, FTA 5311 funds, and other transit specific monies as may become available. 2) The proposed service, if implemented or funded, would not affect the responsible operator or service claimant's ability to meet the required system-wide farebox revenue-to-operating cost ratio of 10%. 3) Proposed transit system expansion must be monitored and evaluated after 6 months of operation (or other approved period of review) by the CCOG board. B. Cost Effectiveness. Supporting data demonstrates sufficient ridership and revenue potential exists for the new, expanded or revised transit service to meet or exceed the required farebox revenue-to-operating cost ratios on a stand-alone basis; except in case of an extension of service determined to be a necessary lifeline service for transit- dependent populations. Furthermore, cost-per-passenger is reasonable when compared to the level of service provided, benefit accrued to the community and to existing service cost-per-

	<p>passenger.</p> <p>C. Community Acceptance. There is sufficient public support for the proposed transit service, as indicated through the annual public hearing process.</p> <p>D. Equity. The proposed transit service would benefit either the general public or the elderly and disabled population as a whole. Transit Service will not be provided favoring one group at the exclusion of any other.</p> <p>E. System Impact. It has been demonstrated to the CCOG Board that the proposed transit service combined with existing service will allow the system to meet or exceed performance standards such as the cost-per-passenger trip, cost-per-service-hour, passenger trips-per-service hour, passenger trip-per-service mile, on time performance and vehicle service hours-per-employee. The proposed service does not duplicate transit services currently provided either publicly or privately. The proposed service is in response to an existing rather than a future need.</p> <p>F. Operational Feasibility. There are adequate roadways and turnouts to safely accommodate transit vehicles.</p> <p>G. Availability of Services Provided. A qualified contractor is available to implement the service.</p>
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Fresno		
Definitions	Unmet Transit Need	"Those public transportation or specialized transportation services that are identified in the Regional Transportation Plan and/or documented through the Fresno COG's Annual Unmet Transit Needs Public Hearing Process that have not been implemented or funded."
	Reasonable to Meet	<p>"Those public transportation services identified in the Regional Transportation Plan, or proposed amendment thereto, which meet the following criteria:"</p> <p>(1) Services which, if implemented or funded, would not cause the responsible operator or service claimant to exceed its appropriations limitation as set forth by Proposition 4 (Gann Limit).</p> <p>(2) Services which, if implemented or funded, would not cause the responsible operator to incur expenditures in excess of the maximum amount of:</p> <p>(a) Local Transportation Funds and State Transit Assistance Funds which may be available for such operator to claim; (b) Federal Transit Administration (FTA) funds or other support for public transportation services which are committed by Federal and/or State agencies by formula or tentative approval of specific grant requests; and (c) Farebox and local funding in compliance with PUC Section 99268 et.seq. The fact that an identified need cannot fully be met based on available resources shall not be the sole reason for finding a transit need is not reasonable to meet.</p> <p>(3) Services which, if implemented or funded, would result in the responsible operator or service claimant meeting the farebox recovery and local support requirements as set forth by PUC Section 99268 et. seq. Evaluation of existing operators shall be based on records provided to Fresno COG by operators pursuant to the Transit Productivity Evaluation Process (PUC Section 99244) Evaluation of proposed new service shall be based upon a feasibility analysis, which includes, but is not limited to: (a) Forecast of anticipated ridership if service is provided; (b) Estimate of capital and operating costs for the provision of such services; (c) Estimate of fares and local support in relation to estimated operating costs for providing such services (d) An estimated fare, which the Fresno COG Board would determine to be sufficient to meet farebox recovery requirements, but would not be so high it would pose a financial burden on transit dependent patrons.</p>

Glenn		
Definitions	Unmet Transit Need	For the purposes of allocating Transportation Development Act funds, and "Unmet Transit Need" is hereby recognized by the Glenn County Transportation Commission (GCTC) if any one or combination of the following criteria is found to exist: 1) Transportation needs identified by the GCTC which are desirable, but have not yet been implemented or addressed. 2) Transportation needs identified by the GCTC which have significant support, but have not yet been implemented or addressed. 3) Transportation needs identified through the public hearing process, whether delivered in writing or public testimony. 4) Those transit needs which, through transit needs studies or other methods approved by the Commission, are included by the Commission in the Regional Transportation Plan for Glenn County and have been designated a high need to be implemented or funded. The above criteria for determining "Unmet Transit Needs" is further supplemented by guidelines. (from march 2012 Agenda Item).
	Reasonable to Meet	Cost-Effectiveness: 1) The new, expanded or revised transit service, would not cause the responsible operator or service claimant to incur expenses in excess of the maximum allocation of Transportation Development Act Funds 2) The new expanded or revised transit service, would allow the responsible operator or service claimant to meet minimum state subsidy farebox and revenue ratios. Community Acceptance: A significant level of support exists for the public subsidy of transit service designed to address the unmet transit need in Glenn County including, but not limited to, support from public groups and community meetings reflecting a public commitment to public transit. Equity: The new, expanded or revised transit service is needed by, and will benefit, either the general public or the elderly and disable population as a whole. Transit service cannot be provided for a special subset of these groups. Operational Feasibility: The new, expanded, or revised transit service must be safe to operate and there must be adequate roadways and turnouts for transit vehicles. Financial Feasibility: 1) Supporting data indicates a sufficient ridership potential exists for the new, expanded or revised transit service. 2) Potential providers are available to implement the service. ADA Conformity: The new, expanded, or revised transit service, in conforming with the requirements of the American with Disabilities Act, will not impose an undue financial burden on the transit operator or claimant if complementary paratransit services are subsequently required. System Impact: The new, expanded, or revised transit service will not result in a negative impact on the overall system's measures of efficiency and effectiveness, such as average passenger load per hour, average cost per passenger per hour, passenger per mile, cost per mile, and cost per hour. Impact Limits: 1) Transit services designed or intended to address an unmet transit need shall, in all cases, provide coordination efforts with transit services currently provided, either publicly or privately, and transit services shall not duplicate services currently or hereafter provided either publicly or privately. 2) No transit need shall be deemed reasonable to meet until it has been reviewed and evaluated to the satisfaction of and obtained subsequent approval from the Glenn County Transportation Commission.

Humboldt		
Definitions	Unmet Transit Need	<p>Unmet transit needs are, at a minimum: 1. Trips requested from residents who do not have access to public transportation, specialized transportation, or private transport services or resources for the purpose of traveling to medical care, shopping, social/recreational activities, education/training, and employment; or 2. Proposed public transportation, specialized transportation, or private transport services that are identified in the following (but is not limited to): Transportation Development Plans, Regional Transportation Plan, the Coordinated Public Transit-Human Services Transportation Plan. Additionally, the TDA stipulates that, for this process, unmet transit needs do <i>not</i> include: - improvements funded or scheduled for implementation in the next fiscal year; - minor operational improvements or changes such as bus stops, schedules, and minor route changes; - trips for purposes outside of Humboldt County; trips for primary or secondary school transportation; - sidewalk improvements or street and road needs.</p>
	Reasonable to Meet	<p>Unmet transit needs may be found to be reasonable to meet by means of the following criteria: 1. Pursuant to the requirements of the Transportation Development Act (TDA) Statutes (Public Utilities Code Section 99401.5c, a determination of needs that are reasonable to meet shall not be made by comparing unmet transit needs with the need for streets and roads, for the allocation of TDA funds. The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for finding that a transit need is not reasonable to meet. 2) If a new, expanded or revised transit service fails to meet ridership or cost effectiveness standards after one full year of operation, reasonable efforts will be made and documented to rectify the situation during the following year of operation. If service has not met performance standards during the period required by the Transportation Development Act Statutes, and efforts to improve service productivity have been documented by the operator to be unsuccessful, the service will be subject to termination as not being reasonable to meet. Efforts to rectify the underperforming ridership may include but are not limited to increased outreach/marketing of service (newspaper placement), collaboration between organizations or agencies that work with potential ridership of the service and surveys documenting ways in which the service could be improved or made more attractive. 3) Evaluation of potential unmet needs shall be conducted by the TDA claimant that is expected to provide the new, expanded, or revised transit service. The TDA claimant shall review, evaluate, and indicate that the service is operationally feasible, including: a. Forecast of anticipated ridership if service is provided. b. Estimate of capital and operating cost for the provision of such services. c. Determination if there are adequate roadways and selected turnouts to safely accommodate transit vehicles. d. Determination that vehicles are currently available in the marketplace. e. Determination if potential transit service duplicates existing services. 4) An unmet need may be determined to be unreasonable to meet because additional information is needed to determine whether or not the unmet transit need is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds.</p>

Imperial		
Definitions	Unmet Transit Need	Unmet Transit needs are at a minimum, those public transportation or specialized transportation services that are identified in the Regional Short Range Transit Plan, or similar Mobility Plan, that have not been implemented or funded.
	Reasonable to Meet	Reasonable to Meet shall include all of the following factors: Community Acceptance: Whether or not the community will allow buses or facsimile in their area. Timing: Whether or not the social, economic or political environmental is amiable to project implementation. Equity: The fair availability of the service to all affected persons. Economy: The project can be implemented at reasonable cost. Cost Effectiveness: The ratio of the service cost to product shall be at or below the standards of evaluation criteria, or minimum farebox ratio (10%).

Inyo		
Definitions	Unmet Transit Need	An Unmet Transit Need exists if an individual or individuals of any age or physical condition are unable to transport themselves from one location to another. An Unmet Transit Need is, at a minimum, those public transportation or specialized transportation services that are identified in the Regional Transportation Plan and that have not been implemented or funded.
	Reasonable to Meet	A documented Unmet Transit Need is reasonable to meet if: A service can be provided which meets a minimum farebox ratio of 10% of operating costs, and: a) It is transit service for essential intra-county purposes which are defined as medical or dental services, shopping, employment, personal business, or social service appointments; or, b) It is a transit service for essential inter-county purposes which are defined as medical or dental services or social service appointments not available in this county or the out-of-county destination is the closest location where the services are available to the origin of the trip; and, The origin and/or designation of the trip is within two miles of the established area of operation of cohesive community.

Kern		
Definitions	Unmet Transit Need	An unmet transit need exists if an individual of any age or physical condition is unable to transport him or herself due to deficiencies in the existing transportation system. Excluded are: 1) those requests for minor operational improvements, and 2) those improvements funded and scheduled for implementation in the following fiscal year.
	Reasonable to Meet	Reasonable to Meet: Operational Feasibility: The requested improvement must be safe to operate and there must be adequate roadways for transit vehicles. Duplication of Service: The proposed service shall not duplicate other transit services. Timing: The proposed service shall be in response to an existing, rather than a future, need. Service must meet the legally required farebox ratio (PUC Sections 99268.2, 99268.5 and CAC Sections 6633.2, 6633.5) with fares close to fare of similar service.

Kings		
Definitions	Unmet Transit Need	"Unmet transit need," at minimum, exist where local residents do not have access to private vehicles or other forms of transportation, due to age, income, or handicap for the purchase of traveling to medical care, shopping, social/recreational activities, education/training and employment.
	Reasonable to Meet	It is "reasonable to meet" the above needs if the proposed or planned service can be operated while maintaining, on a system wide basis, the adopted service goals for that type of service and meet the following criteria: 1) New, expanded, or revised transit service, if implemented or funded, would not cause the operator to incur expenditures in excess of the maximum amount of Transportation Development Act funds available to Kings County. 2) The proposed transit service does not duplicate transit services currently provided by either public or private operators. 3) The proposed transit service has community support from the general public, community grouped and community leaders. 4) New, expanded, or revised transit service, if implemented or funded, would allow the responsible operator to meet the TDA required rural area farebox and revenue ratio of 10% for the overall system. 5) There is supporting data to indicate sufficient ridership potential for the new, expanded, or revised service. 6) Implementation of the new, expended or revised transit service should achieve or be moving toward the goals outlined in the Kings County Transit Development Plan for a comparable type of service. Service not meeting the goals should be evaluated on a yearly basis to determine if modifications or cancellation of service should be implemented. 7) The proposed transit service shall have a reasonable expectation of future demand and available funding on a long-term basis to maintain the service. 8) Is needed by and would benefit either general public or the elderly and disabled population as a whole.

Lake		
Definitions	Unmet Transit Need	Whenever a need by a significant number of people to be transported by moderate or low cost transportation to specific destinations for necessary purposes is not being satisfied through existing public or private resources.
	Reasonable to Meet	The Area Planning Council has determined that a transit need is reasonable to meet if: Funds are available; Benefits of services in terms of number of passengers served and severity of need justify cost; and Service is capable of meeting Transportation Development Act fare revenue/operating cost requirements.

Lassen		
Definitions	Unmet Transit Need	<p>An unmet transit need is any deficiency in the system of public transit services, specialized transit/paratransit services, and private transportation services within the jurisdiction of the Lassen County Transportation Commission (LTC) which has been identified by community members or through a local or regional planning process and which has not been funded and implemented. At a minimum, this may include desires for transportation services which are identified through the annual TDA Unmet Transit Needs public hearing, by the Social Service Transportation Advisory Council, in Lassen County's Transportation Development Plan, in the Regional Transportation Plan, or in the compliance plan for the American with Disabilities Act as prepared by any public or private entity. LTC recognizes that public transportation includes a broad range of users, uses, and destination. Although, some services may be restricted or give priority to traditionally transit-dependent populations (such as elderly, disabled, low-income, or youth), all eligible users should have equivalent access or opportunity to use the service. The transportation desire of a small group of individuals or of the clients of particular agencies shall not, in and of themselves, be sufficient to justify a finding of unmet transit need. Trips that would duplicate transportation services to the general public are not considered unmet transit needs. A need for transportation service beyond the fiscal year under consideration shall not be considered to be an unmet transit need at the present time. Provision of escorts or attendants is not an unmet transit need.</p>
	Reasonable to Meet	<p>An identified unmet transit need can be determined to be "reasonable to meet" if it is demonstrated, based upon LTC staff analysis or other independent evidence, that the transit need can be met within the following performance and financial standards: The performance standard for fixed-route systems is 10% fare revenue ratio. All other systems shall achieve at least the fare revenue ratio and passenger productivity standards established in the Lassen County Transit Development Plan and the Regional Transportation Plan or as established by statute. An extension of service shall not cause the system of which it is a part to fail to meet the system-wide performance standards. Considered separately, it shall achieve at least half the system-wide performance standards, except in case of an extension of service determined to be a necessary lifeline service for transit dependent populations. The unmet transit need will not require the expenditure of more than the affected jurisdiction(s) proportional share of Transportation Development Act funds that are apportioned by LCTC on the basis of population. The determination of whether a transit need is reasonable to meet shall take into account as appropriate: 1) Likely demand for service based on transit use rates per capita in comparable communities. 2. Whether a service to meet the need would put the system of which it is a part in jeopardy of losing state or federal funding as a result of failing to meet mandated performance or efficiency standards. 3. In the case of any new general public transit services, potential Americans with Disabilities Act implications within that service area, including whether or not complementary paratransit service, if required, would impose an "undue financial burden" on the public entity. 4. In the case of a paratransit service providing complementary service to fixed-route service by a public entity, whether meeting the need would require spending a greater amount than that required by an undue financial burden waiver approved by the Federal Transit Administration under the Americans with Disabilities Act. 5. Opportunities for coordination among adjoining public entities or with private transportation provider and/or funding agencies. This shall include consideration of other existing resources (including financial), as well as the legal or customary</p>

		responsibilities of other entities (e.g., social service agencies, religious organizations, schools, carpools, etc.) Duplication of other services or recourses is unnecessary and not a prudent use of public funds.6. An unmet transit need may be determined to be unreasonable to meet because it is not feasible to initiate service within the coming fiscal year, due to the time required for vehicle acquisition, planning, or similar time factors, or because additional information is needed to determine whether or not the unmet needs is reasonable to meet. An unmet transit need shall not be determined unreasonable to meet more than once on these grounds. 7) The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for a finding that a transit need is not reasonable to meet. 8) Comparing unmet transit needs with the need for streets and roads shall not make the determination of whether an unmet transit need is reasonable to meet.
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Los Angeles		
Definitions	Unmet Transit Need	Any transportation need, identified through the public hearing process, which could be met through the implementation or improvement of transit or paratransit services.
	Reasonable to Meet	Any unmet transit need that can be met, in whole or in part, through the allocation of additional transit revenue and be operated in a cost-efficient and service-effective manner, without negatively impacting existing public and private transit options.

Madera		
Definitions	Unmet Transit Need	The Madera County Transportation Commission has determined that its definition of the term “unmet transit needs” includes all essential trip requests by transit-dependent persons for which there is no other convenient means of transportation.
	Reasonable to Meet	<p>The definition of the term “reasonable to meet” shall apply to all related public or specialized transportation services that:</p> <ul style="list-style-type: none"> (1) are feasible; (2) have community acceptance; (3) serve a significant number of the population; (4) are economical; and (5) can demonstrate cost effectiveness <p>by having a ratio of fare revenues to operating cost at least equal to 10 percent, & the Commission has determined that its definition of the term “reasonable to meet” shall also apply to all service requests which do not abuse or obscure the intent of such transportation services once they are established.</p>

Mariposa		
Definitions	Unmet Transit Need	<p>Those public transportation services which have not been funded or implemented but have been identified through public input, including the annual unmet transit needs public hearing, transit needs studies or other methods approved by the Commission. Unmet transit needs specifically include:</p> <ul style="list-style-type: none"> - Public transit services not currently provided for persons to who rely on public transit to reach: employment, medical assistance, shop for food or clothing, to obtain social services such as health care, county welfare programs and educational programs. - Trips requested by the transit dependent or transit disadvantaged persons, for which there is no other available means of transportation. Transit dependent or transit disadvantaged shall include but are not limited to, the elderly, the disabled, youth and persons of limited means.
	Reasonable to Meet	<p>The Mariposa County Local Transportation Commission (LTC) has defined an unmet transit need as “reasonable to meet” if the following conditions prevail:</p> <ol style="list-style-type: none"> 1. New, expanded, or revised transit service, if implemented or funded, would not cause the operator to incur expenditures in excess of the maximum amount of Transportation Development Act (TDA) funds available to the County of Mariposa. 2. The proposed transit service does not duplicate transit services currently provided by either public or private operators. 3. Support exists as demonstrated through the public hearing process or other means of communication for the proposed service. 4. New, expanded, or revised transit service, if implemented or funded, would allow the responsible operator to meet the TDA required rural area farebox and revenue ratio of 10% (or higher percentage as determined by the LTC) for the overall system. In addition, service will be considered reasonable if the projected average cost per ride, by type of service can be provided at a cost no higher than 10% above the average cost per passenger by type of service within Mariposa County for a period no longer than a year. 5. There is supporting data to indicate sufficient ridership potential for the new, expanded, or revised service. 6. The proposed transit service shall have a reasonable expectation of future demand and available funding on a long-term basis to maintain the service. 7. Is needed and would benefit either the general public or the elderly and disabled population as a whole. <p>Comparing unmet transit needs with the need for streets and roads shall not make the determination of whether an unmet transit need is reasonable to meet.</p>

Merced		
Definitions	Unmet Transit Need	<p>An unmet transit need is an inadequacy in the public transit services, specialized transit/paratransit services and private transportation services for those persons recognized as transportation disadvantaged so as to provide themselves with the essentials necessary to maintain a minimum standard of living, as expressed through the public hearing process.</p> <p>The transportation disadvantaged are those individuals who do not operate an automobile because of youth, advanced age or mental or physical impairment; and those persons who are not elderly or handicapped and who are unable to operate an automobile for reasons of low income.</p> <p>The term unmet transit needs shall include transit or specialized transportation services identified in the Regional Transportation Plan, the Transit Service Plan, a finding of an unmet need by the MCAG Governing Board, or in the compliance plan for the Americans with Disabilities Act that have not been implemented or funded.</p>
	Reasonable to Meet	<ol style="list-style-type: none"> 1. The new, expanded, or revised transit service, if implemented or funded, would allow the operator to meet fare box and revenue ratios as required under Public Utilities Code, Division 10, Part 11, Chapter 4, Article 4, Section 99268 and would not cause the operator to incur expenses in excess of the maximum allocation of Transportation Development Act (TDA) funds. 2. The new, expanded, or revised transit service is needed by, and will benefit, either the general public, the transportation disadvantaged, or the elderly and disabled population as a whole and support exists through the public hearing process or other means of communication. 3. The new, expanded, or revised transit service must be safe to operate, and there must be adequate roadways and turnouts for transit vehicles. 4. The new, expanded, or revised transit service, in conforming with the requirements of the Americans with Disabilities Act, will not impose an undue financial burden on the transit operator if complementary Paratransit services are subsequently required. 5. The new, expanded, or revised transit service will not adversely affect the overall system's measure of efficiency and effectiveness, such as average passenger load per hour, average cost per passenger hour, passengers per mile, cost per mile, and cost per hour. 6. Implementation of the new, expanded, or revised service will be considered reasonable if the projected average cost per ride, by type of service can be provided at a cost no higher than 10% above the average existing cost per passenger by type of service within Merced County for a period no longer than one operating year.

Mono		
Definitions	Unmet Transit Need	<p>Unmet Transit Needs: A need of the Mono County elderly, disabled, low income, youth, and other transit-dependent groups for transit service that is currently not available and, if provided for, would enable the transit dependent person to obtain the basic necessities of life primarily within Mono County.</p> <p>“Necessities of life” are defined as trips necessary for medical and dental services, essential personal business, employment, social service appointment, shopping for food or clothing, and social and recreational purposes.</p>
	Reasonable to Meet	<p>Reasonable to Meet: Transit needs for the necessities of life which pertain to all public and/or specialized transportation services that:</p> <ol style="list-style-type: none"> Can be proven operationally feasible; Can demonstrate community acceptance; Would be available to the general public; Can be proven to be economical; and Can demonstrate cost effectiveness by meeting current farebox requirements of the Mono LTC within two years.

Monterey		
Definitions	Unmet Transit Need	<p>An "unmet transit need" is a transportation request that is not being met by the current public transit system, and meets criteria numbered 1 through 3 listed below.</p> <ol style="list-style-type: none"> The request has been identified as a deficiency at a public hearing, or at a meeting of the Social Services Transportation Advisory Council (SSTAC). Community support expressed through the public hearing process. Request represents a trip demand and proposed transit services do not duplicate transit services currently provided either publicly or privately.
	Reasonable to Meet	<p>An unmet transit need is "reasonable to meet" if it meets the criteria listed below.</p> <ol style="list-style-type: none"> The proposed service shall be feasible to fund within the existing and projected limits of TDA funds available to the affected jurisdiction(s). An analysis has been made of the existing public transportation services and specialized transportation services, including privately and publicly provided services, and it has been determined that existing services do not meet this need An analysis has been made of the potential alternative public transportation and specialized transportation services and service improvements that would meet all or part of this request. Funding of this transportation request would not result in Local Transportation Funds (LTF) replacing federal and/or state revenues that presently fund this transportation request. The proposed service is projected to generate the farebox recovery ratio as required of the operator by the Transportation Development Act (TDA) in the urbanized areas of Monterey Peninsula and Salinas, 10% or more in the County unincorporated and South County Cities. Existing transit operators are capable of expanding their services; or establishment of a new service is logistically feasible without negatively impacting the current transit system.

Placer		
Definitions	Unmet Transit Need	An unmet transit need is an expressed or identified need, which is not currently being met through the existing system of public transportation services. Unmet transit needs are also those needs required to comply with the requirements of the American with Disabilities Act.
	Reasonable to Meet	Unmet transit needs may be found to be "reasonable to meet" if all of the following criteria prevail: 1) Service, which if implemented or funded, would result in the responsible service meeting the farebox recovery requirements specified in California Code of Regulations Sections 6633.2 and 6633.5, and Public Utilities Code 99268.2, 99268.3, a99268.4, and 99268.5. Notwithstanding Criterion 1) above, an exemption to the required farebox recovery requirement is available to the claimant for extension of public transportation services, as defined by California Code of Regulations Section 6633.8, and Public Utilities Code 99268.8. 3) Service, which if implemented or funded, would not cause the responsible operator to incur expenditures in excess of the maximum amount of Local Transportation Funds, State Transit Assistance Funds, Federal Transit Administration Funds, and fare revenues and local support, as defined by Sections 6611.2 and 6611.3 of the California Administrative Code, which may be available to the claimant.4) Community support exists for the public subsidy of transit services designed to address the unmet transit need, including but not limited to, support from community groups, community leaders, and community meetings reflecting a commitment to public transit. 5) The need should be in conformance with the goals included in the Regional Transportation Plan. 6) The need is consistent with the intent of the goals of the adopted Short Range Transit Plan for the applicable jurisdiction.

Sacramento RTPA		
Definitions	Unmet Transit Need	Those needs identified as unmet transit needs which have been considered as part of the transportation planning process, i.e. in the appropriate Short Range Transit Plan (S RTP) Update/Annual Review of each jurisdiction, the Americans with Disabilities Act (ADA) Complementary Paratransit Service Plan, or the Metropolitan Transportation Plan (RTP), that have not been implemented or funded. The following criteria shall be used in determining an unmet transit need: a. The size, location and socio-economic characteristics of identifiable groups likely to be dependent on transit (including but not limited to the elderly, disabled, and persons limited means), including individuals eligible for paratransit and other special transportation services pursuant to the federal Americans with Disabilities Act of 1990, trip purposes (such as medical, nutrition, shopping, business, social, school and work), and geographic boundaries and/or major origin and destination points. b. The adequacy of existing public transportation services and specialized transportation services, including privately and publicly provided services, in meeting the identified demand. c. An analysis of the potential alternative public transportation and specialized transportation services that would meet all of part of the demand.

	Reasonable to Meet	<p>An unmet transit need that meets the definition above and that meets all of the following criteria shall be considered reasonable to meet:</p> <ol style="list-style-type: none"> 1. Community Acceptance - That there is a demonstrated interest of citizens in a new or additional transit service to satisfy the unmet transit need, as indicated through the public hearing process or other means of communication. 2. Equity - That the proposed new or additional service is needed by, and will benefit, either the general public or the elderly and disabled population as a whole. 3. Potential Ridership - That the proposed transit service will maintain new service ridership performance standards established for the transit operator in the Short Range Transit Plan. Ridership performance standards can include passengers per hour and passengers per mile. 4. Cost Effectiveness - That the proposed new or additional transit service will not affect the ability of the overall system to meet the State mandated farebox recovery requirements after a two-year exemption period, if the service is eligible for the exemption. If the exemption is not used, that the service meets minimum farebox return requirements as stated in the TDA statutes or established by SACOG. <p>If an existing service fails to meet ridership or cost effectiveness standards for a full fiscal year, or if a new service fails to meet these standards after one full fiscal year of operation, reasonable efforts will be made for an additional year to rectify the situation, using marketing methods established in the SRTP. If a service has not met performance standards for a two-year period, and efforts to improve service productivity have been documented by the operator to be unsuccessful, the service will be subject to termination as not being a transit need that is reasonable to meet.</p>
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San Benito		
Definitions	Unmet Transit Need	<p>"Unmet needs are defined as expressed or identified needs of a significant segment of the community for public transportation services to meet basic mobility needs which are not currently being met through existing transit services or other means of transportation.</p> <p>Included, at a minimum, are those public transportation or specialized services that are identified in the Regional Transportation Plan, Short Range Transit Plan and/or Transit Development Plan, which have not been implemented or funded." The following criteria must be true for the COG to consider a request an "unmet need". If a request fails to satisfy any of the criteria below, the request is not an unmet need.</p> <ol style="list-style-type: none"> 1. The request fills a gap in transit service, or is identified as a deficiency in the Regional Transportation Plan. 2. Sufficient broad-based community support exists. 3. Request is a current rather than future need. 4. Request is not operational in nature (i.e. minor route change, bus stop change, etc.)
	Reasonable to Meet	<p>In making a reasonableness determination, an analysis will be conducted on existing transit services, available options, likely demand and general costs based on similar services in the area and available studies. An Unmet Transit Need would be considered reasonable to meet if the proposed service is in general compliance with the following criteria:</p> <p>A. EQUITY The proposed service would:</p> <ol style="list-style-type: none"> 1. Benefit the general public. 2. Not unreasonably discriminate against nor favor any particular area or segment of the community at the exclusion of any other.

	<p>3. Not result in adversely affect existing services in other parts of the transit system that have an equal or higher priority immediately or within the foreseeable future.</p> <p>4. Require a subsidy per passenger generally equivalent to other parts of the transit system, unless overriding reasons so justify.</p> <p>B. TIMING The proposed service would:</p> <ol style="list-style-type: none"> 1. Be in response to an existing rather than a future need. 2. Be implemented consistent with federal, state, or regional funding approval schedules, if such funds are the most appropriate primary method of funding. <p>C. COST EFFECTIVENESS The proposed service would:</p> <ol style="list-style-type: none"> 1. Not cause the responsible operator or service claimant to incur expenses in excess of the maximum allocated funds. 2. Not set a precedent for other service expansions without a reasonable expectation of available funding. 3. Have available funding on a long-term basis to maintain the service. <p>D. SYSTEM PERFORMANCE</p> <ol style="list-style-type: none"> 1. The efficiency of the new, expanded or revised transit service, excluding specialized transportation services, shall be measured on efficiency, such as: <ul style="list-style-type: none"> !- Cost per passenger trip, !- Cost per vehicle service hour, !- Passenger trips per vehicle service hour, !- Passenger trips per service mile, !- On-time performance. 2. The proposed service would have a reasonable expectation of future increase in ridership. <p>E. OPERATIONAL FEASIBILITY</p> <ol style="list-style-type: none"> 1. The new, expanded or revised transit service must be safe to operate and there must be adequate roadways and turnouts for transit vehicles. 2. The new service would be provided with the existing vehicle fleet or with vehicles that can be acquired with available funds. 3. The new service would have the available maintenance staff to cover the additional vehicle maintenance hours incurred as a result of the proposed service. <p>F. COMMUNITY ACCEPTANCE A significant level of community support exists for the public subsidy of transit services designed to address the unmet transit need. Including but not limited to, community groups, community leaders, and community meetings reflecting support for the unmet transit need.</p> <p>G. ADA CONFORMITY The new, expanded or modified service, excluding specialized transportation services, would conform to the requirements of the Americans with Disabilities Act. The COG shall consider the financial impact on the TDA claimant if complementary paratransit services are required as a result of the new, expanded, or modified service.</p> <p>H. OTHER FACTORS Other specific, formulated components that COG determines to affect the reasonableness of meeting an unmet transit need.</p>
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San Joaquin		
Definitions	Unmet Transit Need	UNMET TRANSIT NEEDS are defined as transportation services not currently provided to those residents who use or would use public transportation regularly, if available, to meet their life expectations. This includes, but is not limited to: trips for medical and dental services, shopping, employment, personal business, education, social services, and recreation.
	Reasonable to Meet	<p>An unmet transit need that meets the definition above and meets all of the following criteria shall be considered reasonable to meet:</p> <ol style="list-style-type: none"> 1. Community Acceptance - There should be a demonstrated interest of citizens in the new or additional transit service (i.e. multiple comments, petitions, etc.). 2. Equity - The proposed new or additional service will benefit the general public, residents who use or would use public transportation regularly, the elderly population, and persons with disabilities. 3. Potential Ridership - The proposed transit service will maintain new service ridership performance measures, as defined by the Social Services Transportation Advisory Committee (SSTAC). 4. Cost Effectiveness - The proposed new or additional transit service will not affect the ability of the overall system to meet the applicable Transit Systems Performance Objectives or state farebox ratio requirement after exemption period, if the service is eligible for the exemption. The Transit Systems Performance Objectives are defined as 1) operating cost per revenue hour, 2) passengers per revenue hour, and 3) subsidy per passenger. If the exemption is not used, the service must meet minimum applicable Transit Systems Performance Objectives or farebox ratio return requirements as stated in the TDA statutes. Cost effectiveness is not applicable to transit services operating within an exemption period. 5. Operational Feasibility - The system can be implemented safely and in accordance with local, state, and federal laws and regulations. 6. Funding - The imposed service would not cause the claimant to incur expenses in excess of the maximum allocation of TDA funds.

San Luis Obispo		
Definitions	Unmet Transit Need	A request must meet all of the following four (4) adopted criteria if it is to be determined an "unmet need": a. The request fills a gap in transit service or is identified a a deficiency in the Regional Transportation Plan (RTP), Clean Air Plan (CAP), ADA Paratransit Plan or the Short Range Transit Plan (SRTP); b. Sufficient broad based community support is demonstrated by persons who will likely use the service on a routine basis (at least 15 requests for general public service and 10 requests for disabled service); c. The request is a current rather than a future need; and d. The request is for service expansion, such as increased hours, increased frequency, new routes, significant modifications to existing routes; and not operational in nature, such as minor route changes or bus stop changes, etc. (If the request is for minor service changes, the request will be forwarded to the transit operator for follow-up).
	Reasonable to Meet	An unmet need must meet all of the following 4 adopted criteria in order for it to be deemed "reasonable to meet" a. Farebox Recovery: The request is projected to generate the required farebox ratio (10% rural, 20% urban, 15.8% RTA) by the third year demonstrating continuous progress after the first and second year. b. Served entity: Service will not involve funding from a non-served entity. C. Service is comparable with other similar transit services (such

		as local fixed-route, regional fixed-route, local general public Dial-A-Ride, specialized Dial-A-Ride, circulator, trolley, etc.) or will be similar, based on the projected number of passengers per hour the proposed service would carry. d. The request is fundable with existing TDA (LTF & STA) funds, without reducing other existing transit services. The new, expanded, or revised service, if implemented, will not cause the responsible operator to incur expenditures in excess of available TDA (LTF & STA) funds (If 100% of the TDA (LTF & STA) funds are being used for transit, no mandate can be imposed upon the operator.) "The fact that an identified transit need cannot be fully met based on available resources shall not be the sole reason for finding that a transit need is not reasonable to meet.
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Tahoe RTPA		
Definitions	Unmet Transit Need	Those public transportation improvements identified for implementation in the claimant's jurisdiction during the first five-year phase of the Transportation Element of the Regional Plan.
	Reasonable to Meet	New, expanded or revised transportation services to the public that offers equitable access, can be implemented within the first-five year phase of the Transportation Element of the Regional Plan, and is technically feasible, would be accepted by the community, can be funded within the five year time period and is cost-effective.

Tulare		
Definitions	Unmet Transit Need	An unmet transit need, as identified during the TCAG annual unmet needs process, exists where local residents do not have access to private vehicles or other forms of transportation to conduct daily life activities.
	Reasonable to Meet	It is reasonable to meet the above needs if the new, expanded, or revised service can be expected to meet all of the following criteria: 1. The service can be operated while maintaining, on a system-wide basis, the farebox ratio required by the TDA (for urbanized areas 20%; for non-urbanized areas 10%). 2. Service shall meet the minimum ratio of fare revenue to operating costs of 10% (represents half of the system-wide performance standard for urbanized areas). 3. There is data and community input to support the necessary ridership to meet the required minimum fare ratio as reference in criteria No. 2. 4. The service, if implemented or funded, would not casue the operator to incur expenditures in excess of the maximum amount of TDA funds available to each member agency. 5. The service shall have a reasonable expectation of future demand and available funding on a long-term basis to maintain the service. 6. The service must be safe to operate and there must be adequate roadways and turnouts for transit vehicles. Potential providers are available to implement the service.

Tuolumne		
Definitions	Unmet Transit Need	<p>Public transit services not currently provided for persons who rely on public transit to maintain independence participate in their community, reach employment and other services."</p> <p>Unmet transit needs specifically include: 1) Transit specialized transportation needs identified in Tuolumne County's Americans with Disabilities Act Paratransit Plan which are not yet implemented or funded; and 2) Transit or specialized transportation needs identified and proven by the Social Services Transportation Advisory Council through testimony or reports which are not yet implemented or funded.</p> <p>Unmet transit needs specifically exclude: 1) Minor operational improvements or changes, involving issues such as bus stops, schedules and minor route changes; 2) Improvements funded or scheduled for implementation in the following fiscal year; 3) Trips for any purpose outside of Tuolumne County; and 4) Future transportation needs.</p>
	Reasonable to Meet	<p>"Unmet transit needs that are Reasonable to Meet" will be based on analysis using the following criteria: A) Cost Effectiveness. 1) The new, expanded or revised transit service, if implemented or funded, would not cause the responsible operator or service claimant to incur expenses in excess of the maximum allocation of Transportation Development Act funds. 2) The new, expanded or revised transit service, if implemented or funded, would allow the responsible operator or service claimant to meet the required farebox revenue to operating cost ratios.</p> <p>B) Community Acceptance. Support exists for the public subsidy of the new, expanded or revised transit service, as indicated through the public hearing process or other means of communication.</p> <p>C) Equity. 1) The new, expanded or revised transit service is needed by, and will benefit, either the general public or the elderly and disabled population as a whole. Transit service cannot be provided for a specific subset of these groups. 2) Complimentary paratransit services cannot exceed the level of service provided to the general public. D) Operational Feasibility. 1) The new, expanded or revised transit service must be safe to operate and there must be adequate roadways and turnouts for transit vehicles. 2) Potential providers are available to implement the service. E) Financial Feasibility. 1) Supporting data indicates sufficient ridership and revenue potential exists for the new, expanded or revised transit service to meet or exceed the required farebox revenue to operating cost ratios on a stand alone basis. F) ADA Conformity. The new, expanded or revised transit service, in conforming with the requirements of the Americans with Disabilities Act, will not impose an undue financial burden on the transit operator or claimant if complementary paratransit services are subsequently required. G) System Impact. The effect of the new, expanded or revised transit service on the overall system's measures of efficiency and effectiveness, such as the cost per passenger trip, cost per vehicle service hour, passenger trips per vehicle service hour, passenger trips per service mile, on-time performance and vehicle service hours per employee shall not be significantly adversely impacted. H) Impact Limits. Implementation of the new, expanded or revised transit service will be considered reasonable if the projected average cost per trip, by type of service, can be provided at a cost no higher than 10% above the average cost per passenger trip, by type of service, of the overall transit system.</p>