

## The Board of Supervisors

County Administration Building  
651 Pine Street, Room 106  
Martinez, California 94553

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## Contra Costa County



**David Twa**  
Clerk of the Board  
and  
County Administrator  
(925) 335-1900

January 9, 2018

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

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

Dear Chair Mackenzie:

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

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

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



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

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

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

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

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

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

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



Chair Jake Mackenzie  
January 9, 2018

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

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

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

Sincerely,



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

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